CENTRAL CO-OPERATIVE LEARNING TRUST

Restrictive Interventions Policy

Including the use of reasonable force, restraint and seclusion

2026

Responsibility:	CEO / Trust Safeguarding Lead		
Approved by:	Trust Board	**Date:**	01/04/2026
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Policy Statement

This policy sets out **Brownhills West Primary School's** approach to restrictive interventions, including the use of reasonable force, restraint and seclusion. **Brownhills West Primary School** is part of the Central Cooperative Learning Trust. The Trust and the school recognise that restrictive interventions can have a significant physical and psychological impact on pupils and staff. They should therefore only ever be used when necessary, proportionate and lawful, and where less restrictive measures have been attempted or assessed as inappropriate in the circumstances.

Brownhills West Primary School is committed to:

- safeguarding the welfare, dignity and human rights of pupils
- preventing and minimising the need for restrictive interventions
- supporting staff to manage behaviour safely and confidently
- meeting statutory recording and reporting duties
- using data to continuously improve practice

This policy should be read alongside the

- **Brownhills West Primary School** Relationship and Behaviour Policy
- CCLT Safeguarding and Child Protection Policy
- CCLT SEND Policy
- **Brownhills West Primary School**'s Health and Safety Policy and
- CCLT Complaints Policy.

This policy is informed by:

- Education and Inspections Act 2006 (sections 93 and 93A)
- Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- Equality Act 2010
- Human Rights Act 1998
- Health and Safety at Work etc. Act 1974
- DfE guidance: Restrictive interventions, including use of reasonable force, in schools (April 2026)
- Keeping Children Safe in Education (2025)

Definitions

- Restrictive intervention: **Any** action that prevents, restricts or subdues a pupil's movement, including physical and non-physical interventions.

- Reasonable force: Physical force used by staff to prevent injury, damage, criminal behaviour or serious disorder. It must be the minimum necessary for the **shortest** time.

- Restraint: A **non-disciplinary intervention** that immobilises or limits a pupil's movement, with or without physical contact.

- Seclusion: A **non-disciplinary safety measure** involving keeping a pupil in a place away from others and preventing them from leaving.

- Significant incident: Any incident where force goes beyond everyday physical contact and requires formal recording and reporting.

Where this policy uses the word '**must'**, this indicates a legal requirement. Where it uses '**should'**, this indicates expected practice unless there is good reason not to follow it.

Section 1: Using restrictive intervention

1.1 Prevention and de-escalation

Brownhills West Primary School prioritises proactive strategies to minimise the need for restrictive interventions, including:

- positive behaviour support approaches
- consistent routines and expectations
- trauma-informed practice
- environmental adaptations
- early identification of triggers
- effective communication strategies
- strong relationships between staff and pupils

Individual support may include behaviour support plans, reasonable adjustments, sensory strategies and joint working with parents [1]and external professionals.

1.2 Staff Training

Brownhills West Primary School 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 may be required 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.

Brownhills West Primary School will ensure that training needs are informed by its pupil cohort, patterns and trends in incidents, and risk assessments. As an employer, CCLT 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 pupils who present a higher level of risk.

In this school, **all** staff members employed by CCLT access de-escalation and behaviour education training. This is part of the school's universal professional learning.

In this school, **some** members of staff are specifically trained in the use of restrictive interventions. These staff members are:

Name	Role	Date of training	Training programme
Jon McNamee	Headteacher	09.09.2022	Team Teach

1.3 When restrictive interventions may be used

Restrictive interventions, including the use of reasonable force, restraint and seclusion, may only be used in **exceptional circumstances** where they are **lawful, necessary and proportionate**, and where other less restrictive measures have been attempted or assessed as inappropriate in the circumstances.

In line with the April 2026 Department for Education guidance, restrictive interventions may only be used to prevent a pupil from:

- causing injury to themselves or others

[1] For the purposes of this policy, 'parent' includes carers and any person with parental responsibility, and in relevant circumstances a local authority acting in that role.

- committing a criminal offence
- causing serious damage to property
- causing significant disorder.

The decision to use a restrictive intervention is a matter of **professional judgement** and must always be based on the specific circumstances at the time. Before using, or continuing to use, a restrictive intervention, staff must, wherever practicable, consider the following factors, which are drawn directly from the guidance:

Necessity
Staff should consider whether a restrictive intervention is required to reduce an immediate risk of harm and whether other less restrictive strategies, including de-escalation, redirection or support from other staff, are likely to be effective. Where a restrictive intervention is unlikely to successfully reduce risk or is likely to escalate the situation further or cause more harm than the behaviour itself, it should not be used.

Proportionality
Any restrictive intervention must be the **least restrictive option available**, using the **minimum amount of force** for the **shortest amount of time** necessary to reduce the risk. If an intervention is not reducing risk or is escalating the situation, staff must reconsider their approach and seek to reduce or cease the intervention as soon as it is safe to do so.

Pupil welfare and dignity
Staff must consider the impact of any restrictive intervention on the pupil's physical and psychological wellbeing. Where possible, staff should seek to maintain the pupil's dignity, including consideration of the environment in which the intervention takes place, and should communicate calmly and clearly with the pupil about what is happening and why.

Vulnerabilities and SEND
Staff must have regard to the individual needs and circumstances of the pupil, including any special educational needs, disabilities, medical conditions, communication needs, sensory sensitivities, past trauma or other vulnerabilities. These factors may affect how a pupil experiences an intervention and must inform decision-making before, during and after any restrictive intervention.

Equality implications
Staff must consider relevant duties under the Equality Act 2010, including the need to avoid discrimination, make reasonable adjustments and ensure that responses do not disproportionately impact pupils who share protected characteristics.

Restrictive interventions must never be used as a punishment, as a disciplinary sanction, or for the purpose of compliance or convenience. They must only be used as a last resort safety measure and must cease as soon as the immediate risk has reduced.

Following any restrictive intervention, staff must ensure that appropriate post-incident actions are taken in line with this policy, including recording and reporting, medical checks where

appropriate, reflection and review.

1.4 Statutory power to use reasonable force (Education and Inspections Act 2006)

Under section 93 of the Education and Inspections Act 2006[2], all members of school staff have a statutory power to use reasonable force in limited circumstances to prevent a pupil from causing injury to themselves or others, committing a criminal offence, damaging property, or causing disorder.
This power applies while staff are lawfully in charge of pupils and extends to situations both on and off **Brownhills West Primary School** 's site, including educational visits. Section 93 provides the legal basis for the use of reasonable force in schools, and any such use must be reasonable in the circumstances, meaning that it must be necessary and proportionate to the risks presented at the time.

In addition, section 93A of the Act places a statutory duty on governing bodies and proprietors to ensure that arrangements are in place for recording and reporting significant incidents involving the use of force. This policy reflects both the legal power under section 93 and the statutory recording and reporting duties under section 93A and must be implemented in a way that is consistent with wider safeguarding, equality, human rights and health and safety obligations.

1.5 Unacceptable use of restrictive intervention

Restrictive interventions must never be used as a punishment, a disciplinary sanction, or for the purpose of compliance, convenience or to manage behaviour where there is no immediate risk of harm. Any use of force or restrictive practice for these purposes is unlawful.

Staff must not use any techniques or approaches that may restrict or interfere with a pupil's airway, breathing or circulation. This includes, but is not limited to, applying pressure to the neck, throat, chest or abdomen, covering the mouth or nose, or positioning a pupil in a way that compromises respiration. Such practices present a serious and potentially fatal medical risk and are strictly prohibited.

The use of restrictive interventions carries inherent physical and psychological risk, particularly where they occur on the ground. Ground restraint should therefore be avoided wherever possible. Where a pupil is unintentionally brought to the ground, staff must take immediate steps to reduce risk by repositioning or releasing holds as soon as it is safe to do so and moving to a safer alternative or standing position.

Any restrictive intervention that presents, or begins to present, a medical risk, must stop immediately. Where a pupil has been restrained, particularly where there has been any impact to breathing, circulation, consciousness or physical injury, staff must seek medical assessment and treatment as soon as practicable.

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[2] Education and Inspections Act 2006, Section 93 (reasonable force): https://www.legislation.gov.uk/ukpga/2006/40/section/93

Staff must also be mindful that restrictive interventions can cause significant psychological distress. Interventions that humiliate, degrade, intimidate, threaten or deliberately cause emotional harm are unacceptable. All responses must seek to preserve the pupil's dignity and wellbeing, even in high-risk situations.

Any incident involving unacceptable practice, or where there is concern that an intervention may have compromised a pupil's safety, must be reported immediately in line with **Brownhills West Primary School**'s Safeguarding and Child Protection Policy, and consideration should be given to any other relevant reporting requirements.

1.6 Appropriate physical contact

Appropriate physical contact (for example, first aid, comfort, guiding or PE instruction) is lawful and sometimes necessary. Staff must use professional judgement and consider safeguarding context, pupil age, vulnerability and alternative strategies.

1. 7 Reasonable force for searching pupils.

Under statutory powers[3], the headteacher and staff authorised by the headteacher may search a pupil or their possessions where they have reasonable grounds to suspect that the pupil is in possession of a prohibited item. Prohibited items are those set out in legislation and include, for example, knives or weapons, alcohol, illegal drugs, stolen items and any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property.

Where a lawful search is taking place for a prohibited item, staff may use such force as is reasonable in the circumstances to conduct that search. Any use of force in this context must be necessary, proportionate and for the shortest possible time, and must be consistent with the principles set out in this policy.

Reasonable force must not be used to search for items that are banned only under the school's own rules. Where force is used during a search, this will be treated as a restrictive intervention and must be managed in line with this policy, including consideration of the pupil's welfare, dignity, vulnerabilities and any SEND or medical needs.

Any significant incident involving the use of force during a search must be recorded and reported in accordance with statutory duties.

All searches must be carried out in accordance with the school's Searching, Screening and Confiscation procedures, and staff involved in searching pupils will receive appropriate guidance and training.

1.8 Seclusion

Seclusion is defined in statutory guidance as a non-disciplinary, short-term safety measure and may only be used where a pupil is experiencing high levels of emotional or behavioural dysregulation and there is a serious and immediate risk of harm to the pupil or to others.

[3] Section 550ZA of the Education Act 1996

Seclusion must never be used as a punishment, a sanction, a planned behaviour management strategy, or as a response to deliberate non-compliance where there is no immediate risk.
Seclusion must only ever be used to reduce an immediate risk of harm and must not be used to coerce, threaten or control a pupil. It should not be implemented through the threat of punishment or the suggestion that negative consequences will follow if a pupil attempts to leave.

Where seclusion is used, the place in which the pupil is confined must be safe, suitable and non-threatening, taking account of the pupil's age, needs, vulnerabilities and sensory sensitivities. The environment must not present a risk to the pupil's physical or psychological wellbeing and should allow the pupil to calm and regain regulation.

A pupil who is secluded must be continuously supervised at all times by a member of staff. Supervision must be active and purposeful, enabling staff to monitor the pupil's physical and emotional wellbeing, communicate appropriately, and respond immediately if the pupil becomes distressed, unwell or at risk.

Seclusion must end as soon as the immediate risk of harm has reduced. It must not continue beyond the point at which it is necessary to manage risk, and pupils must be supported to rejoin others safely when they are able to do so.

Any incident involving seclusion must be treated as a significant safeguarding event.

All incidents of seclusion must be recorded and reported in line with statutory duties[4].

Following any use of seclusion, appropriate post-incident actions must take place, including welfare checks, reflection, support and review of preventative strategies.

Section 2: Post Incident

2.1 Record Keeping

Brownhills West Primary School recognises that incidents involving restrictive interventions are **significant safeguarding events**[5].

The Trust board ensures that clear procedures are in place for the **recording and reporting** of all relevant incidents.

Recording of significant incidents involving the use of force

All **significant incidents** involving the use of reasonable force must be recorded in writing (the form provided in appendix 1 is made available electronically for completion) **as soon as practicable after the event**; in any case, staff should endeavour to complete records **no later**

[4] (No. 2) (England) Regulations 2025 and section 93A of the Education and Inspections Act 2006.

[5] In accordance with section 93A of the Education and Inspections Act 2006 and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025

than the same day. A note and a copy of the formal record must be captured in the safeguarding system (CPOMS).

Records must be completed by the staff member(s) involved and must provide a clear, factual account of the incident. As a minimum, records will include:

- the name of the pupil and the names of staff directly involved
- the date, time, location and approximate duration of the incident
- a brief account of what happened, including any known context, antecedents, triggers and behaviours of concern
- details of any preventative or de-escalation strategies attempted prior to the use of force
- where relevant, the type of reasonable force used and the degree of force applied
- a brief explanation of why the use of force was assessed as necessary at the time
- details of any physical injuries, distress or welfare concerns
- details of any immediate and ongoing post-incident support, including medical attention where provided.

The requirement to record applies even where the use of restrictive interventions has been discussed or anticipated within a Behaviour Support Plan.

2.2 Reporting of significant incidents involving the use of force

Parents must be informed in writing of each significant incident involving the use of force **as soon as practicable after the incident**, and **Brownhills West Primary School** should endeavour to do this **no later than the same day**, unless a statutory exception applies. Reports to parents will include, as a minimum:

- the date, time, location and approximate duration of the incident
- a brief account of why the intervention was assessed as necessary
- a brief description of what type of force was used and the degree of force applied
- details of any physical injuries or welfare concerns, where applicable

Brownhills West Primary School will normally invite parents to discuss the incident, including any relevant triggers, the effectiveness of preventative strategies, and whether any behaviour support plans or risk assessments require review.

Exceptions to the duty to report apply only where:

- the pupil is aged 20 or over, or
- it appears that informing a particular parent would be likely to result in serious harm to the pupil. 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.

2.3 Recording and reporting of seclusion and non-force restraint

All incidents involving **seclusion** or **restraint without physical force** must be recorded and reported[6].

This includes incidents where restrictive interventions are used in line with an agreed Behaviour Support Plan. Records must be completed as soon as practicable and no later than the same day wherever possible.

Where an incident of restraint also constitutes a significant use of force, **Brownhills West Primary School** will follow the significant incident reporting procedure set out above.

The same information will not be reported twice. Where an incident involves seclusion or restraint without physical force and does not constitute a significant use of force, the reporting duties under the 2025 Regulations will apply.

2.4 Post-incident support and review

Following any restrictive intervention, **Brownhills West Primary School** 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.

2.5 Immediate welfare and medical checks

As soon as practicable after the incident, staff will check the pupil and any staff involved for signs of injury, distress or illness. Where appropriate, first aid will be administered and medical assessment or treatment sought. Any injuries or health concerns will be recorded in line with **Brownhills West Primary School**'s health and safety procedures and reported to the Health and Safety Executive where required.

2.6 Emotional wellbeing and safeguarding support

Brownhills West Primary School recognises that restrictive interventions can be distressing. Consideration will therefore be given to the emotional wellbeing needs of the pupil, any staff involved, and any pupils who may have witnessed the incident. Support may include access to pastoral staff, counselling services, trusted adults, supervision, the Employee Assistance Programme, or other appropriate support mechanisms.

2.7 Reflective debrief and learning

Brownhills West Primary School will hold reflective debrief conversations following incidents involving restrictive interventions. These discussions are intended to support wellbeing, enable learning and improvement, and reduce future risk. Where appropriate, debriefs will include:

- a factual review of what happened and why
- reflection on early warning signs and triggers

[6] in accordance with the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025. Where required, incidents will also be reported in accordance with health and safety reporting requirements.

- consideration of what preventative and de-escalation strategies were used and their effectiveness
- identification of any alternative approaches that may reduce the likelihood of recurrence.

Where possible, debriefs should be facilitated by a member of staff who was not directly involved in the incident, and may include the pupil and their parent where appropriate.

2.8 Review of support and risk management

Following any restrictive intervention, **Brownhills West Primary School** will review relevant behaviour support plans, risk assessments and reasonable adjustments. Changes will be made where necessary to better support the pupil, address underlying needs, and strengthen preventative measures. Parents and carers will be included in the planning of any such reviews.

2.9 Repairing relationships and reintegration

Brownhills West Primary School is committed to repairing and rebuilding relationships following incidents involving restrictive interventions. Where appropriate, restorative approaches will be used to support the pupil's reintegration, rebuild trust between pupils and staff, and promote a sense of safety, dignity and belonging.

2.10 Monitoring and escalation

Leaders will monitor incidents and post-incident actions to identify patterns, emerging risks or training needs. Where restrictive interventions occur repeatedly or where concerns arise, this will trigger further review, multi-agency engagement where appropriate, and escalation through safeguarding or SEND processes.

Section 3: Leadership and Management of Restrictive Intervention

3.1 Governance

The Trust board recognises that the use of restrictive interventions is a significant safeguarding matter and will provide appropriate oversight to ensure that practice across **Brownhills West Primary School** is lawful, proportionate and focused on prevention.
In line with statutory duties and the April 2026 Department for Education guidance, the Trust board will ensure that suitable arrangements are in place to support the effective implementation of this policy and the associated recording and reporting requirements.

In fulfilling this responsibility, the Trust board will:

- ensure that this policy is implemented and reviewed regularly
- assure itself that statutory recording and reporting duties are being met
- receive and consider information about the use of restrictive interventions, including emerging patterns or trends
- be mindful of any disproportionate impact on pupils with special educational needs and disabilities or other identified vulnerabilities

- use information from incidents to inform discussion about prevention, training and support
- ensure that staff are appropriately supported and trained
- ensure that learning from incidents contributes to the ongoing development of practice.

Oversight of restrictive interventions will form part of the local academy committee and the Trust board's wider safeguarding and pupil wellbeing responsibilities.

3.2 Complaints

Any complaints raised in relation to the use of restrictive interventions will be managed in accordance with the CCLT 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 pupil at risk, the matter will be managed in line with **Keeping Children Safe in Education (2025)** and the CCLT safeguarding and allegations management procedures.

Where appropriate, the school will work with external agencies to ensure concerns are managed in accordance with statutory guidance. This includes consideration of whether the concern meets the threshold for referral to the Local Authority Designated Officer (LADO) and whether any immediate safeguarding or risk management actions are required.

CCLT will ensure that allegations are considered objectively, based on the available evidence, and that appropriate support is provided to all parties involved.

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

Appendices:

Appendix 1: Reporting template - school

Appendix 2: Reporting template - parents

The paper copy of these forms are on the following pages. Completed forms should be uploaded to CPOMS. Parents should receive the written notification on the day of the intervention.

Appendix 1: School Reporting template

Restrictive Intervention Incident Report Form

Use of reasonable force, restraint and/or seclusion

SECTION 1: BASIC DETAILS

School:	
Date of incident:	
Time incident started:	
Time incident ended:	
Approximate duration:	
Location of incident:	

SECTION 2: PUPIL DETAILS

Pupil name:	
Date of birth:	
Year group:	
SEND status (SEN Support / EHCP):	

Primary need (if known):	
Relevant medical, sensory, communication or vulnerability factors:	

SECTION 3: STAFF INVOLVED

Name and role of staff member(s) directly involved:	
Names of any witnesses:	

SECTION 4: DESCRIPTION OF INCIDENT

Brief factual account of what happened, including context and behaviours of concern:	
Known or suspected triggers or early warning signs:	
Strategies used before restrictive intervention:	
Why these strategies were assessed as insufficient:	

SECTION 5: RESTRICTIVE INTERVENTION USED

Reasonable force / Physical restraint / Seclusion / Non-force restraint	
Description of what was done, including degree of force:	
Why this intervention was assessed as necessary:	
Type of intervention used:	
Was this the least restrictive option available?	

SECTION 6: WELFARE AND MEDICAL INFORMATION

Were there any injuries or physical effects?	YES	NO
Details		
Was first aid or medical support provided?	YES	NO
Details		
Any emotional distress observed:	YES	NO
Details		

SECTION 7: SECLUSION

Was seclusion used?	YES		NO
Was the pupil continuously supervised?	YES	NO	Not applicable
Location of seclusion:			
Duration			
How was the pupil supported to exit seclusion?			

SECTION 8: POST-INCIDENT ACTIONS

Immediate actions taken:	
Follow-up support planned:	

SECTION 9: PARENT/CARER REPORTING

Has the incident been reported to parents/carers?	YES	NO
Method:		
Date and time reported:		
Name of person who reported:		
If not reported, state statutory reason:		

SECTION 10: REVIEW AND LEARNING

Outline any need to review behaviour support, risk assessment, reasonable adjustments, training or environment?

SECTION 11: COMPLETED BY

Completed by (name and role)	
Date	

Reviewed by (Senior Leader)	
Date	

Appendix 2: Parent Reporting template

Restrictive Intervention Incident Report Form - Parents

Use of reasonable force, restraint and/or seclusion

Pupil name:		**Date of birth:**		**Year group:**	
SEND status (SEN Support / EHCP):		**Primary need (if known):**			

Relevant medical, sensory, communication or vulnerability factors:			
Date and time of intervention:		Duration of intervention:	
Reason for intervention:			
Summary of event:			
Any injuries/welfare concerns:			
Next steps or follow-up discussions:			