



# EMMAUS

## CATHOLIC MAC

### Restrictive Interventions and Use of Reasonable Force Policy

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|-------------------------------------|---------------------------|
| Version:                            | 1                         |
| Date created/updated:               | April 2026                |
| Ratified by:                        | Board of Directors        |
| Date ratified:                      | 19 <sup>th</sup> May 2026 |
| Date issued:                        | 9 <sup>th</sup> June 2026 |
| Policy Review Date:                 | April 2027                |
| Post Holder Responsible for Review: | MAC Inclusion Lead        |



**Commitment to Equality:**

We are committed to providing a positive working and learning environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

**This Restrictive Interventions and Use of Reasonable Force Policy has been approved and adopted by all schools that are part of Emmaus Catholic Multi Academy Company on 9<sup>th</sup> June 2026 and will be reviewed again in April 2027.**

Signed by Director of Emmaus MAC: **J Griffin**

Signed by CEO for Central Team: **S Horan**

## **Statement of intent**

St Gregory's believes that it is important to establish a safe, secure and stable environment to enable pupils to grow, develop and learn. As a school within Emmaus Catholic Multi Academy Company, St Gregory's is committed to forming Christ-centred pilgrims of hope with kind hearts, questioning minds, a thirst for knowledge and a hunger for justice, and to upholding the dignity and wellbeing of every child.

To achieve this, the school recognises that, in certain circumstances, physical intervention, including safe touch and the use of reasonable force, is necessary as a safeguarding measure.

The school understands that behaviour is often a means of communication which may signal that a pupil is in need of support but does not know how to express this; therefore, the school takes a proactive approach to anticipating, managing and minimising potential triggers of distressed behaviour that may cause harm.

This policy acknowledges that situations may arise in which staff members will be required to use physical intervention, and in some cases reasonable force, in order to handle pupils' emotions or aggressive behaviour when other measures have failed to do so.

The aim of this policy is to ensure that physical intervention is used in a correct and safe manner, in accordance with relevant legislation and national guidance, and always with respect for the pupil's dignity and welfare.

### **1. Legal framework**

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education Act 2011
- Children Act 1989
- Children and Families Act 2014
- Equality Act 2010
- Human Rights Act 1998
- DfE Restrictive interventions, including use of reasonable force, in schools
- DfE Working Together to Safeguard Children
- DfE Keeping children safe in education

This policy operates in conjunction with the school's:

- Behaviour Policy
- Allegations of Abuse Against Staff Policy
- Special Educational Needs and Disabilities (SEND) Policy
- Disciplinary Policy and Procedures
- Complaints Policy
- Staff Code of Conduct
- Allegations Against Staff (including low-level concerns) Policy
- Safeguarding Policy including Child Protection

### **2. Roles and responsibilities**

### **The Board of Directors**

The Board of Directors is responsible for:

- Approving this policy and ensuring it complies with statutory requirements, national guidance and the values and mission of Emmaus Catholic Multi Academy Company.
- Providing strategic oversight of the use of restrictive interventions and reasonable force across the MAC.
- Ensuring appropriate governance and safeguarding assurance arrangements are in place in relation to restrictive interventions.
- Reviewing anonymised, aggregated reports on the use of reasonable force across the MAC, including any identified trends, risks or concerns.
- Reviewing this policy on an annual basis, or sooner where required.

### **The Chief Executive Officer (CEO)**

The CEO is responsible for:

- Ensuring the effective implementation of this policy across all schools within Emmaus Catholic Multi Academy Company.
- Ensuring Principals understand and fulfil their responsibilities in relation to restrictive interventions and the use of reasonable force.
- Ensuring appropriate training, guidance and support are available to schools to enable staff to carry out their duties safely and lawfully.
- Ensuring consistent arrangements are in place across the MAC for recording, reporting and monitoring incidents involving restrictive interventions and reasonable force.
- Escalating significant concerns or high-risk incidents to the Board of Directors where appropriate.

### **The MAC Safeguarding Lead**

The MAC Safeguarding Lead is responsible for:

- Providing strategic safeguarding oversight and advice in relation to the use of restrictive interventions and reasonable force across the MAC.
- Monitoring safeguarding implications arising from recorded incidents and identifying any emerging patterns, risks or concerns.
- Supporting schools to ensure restrictive interventions are applied lawfully, proportionately and in line with safeguarding guidance.
- Advising the CEO and Principals on safeguarding responses to serious or complex incidents.
- Contributing to policy review and ensuring continued alignment with statutory safeguarding guidance.

### **The Local Governing Body**

The Local Governing Body is responsible for:

- Monitoring the implementation of this policy at school level.
- Ensuring the school Behaviour Policy includes the power to use reasonable force where lawful and necessary.
- Evaluating, on an annual basis, instances of physical intervention to analyse how and when reasonable force is used and to identify any trends.
- Escalating concerns to the CEO where required.

- Responding to complaints, in liaison with the Principal and in line with the Emmaus Catholic MAC Complaints Policy, regarding the use of reasonable force.

### **The Principal**

The Principal is responsible for:

- Ensuring this policy is implemented effectively within the school.
- Deciding whether members of staff require additional training to enable them to carry out their responsibilities, taking account of pupils' needs.
- Ensuring all members of staff understand appropriate conduct in relation to positive handling.
- Ensuring accurate recording and monitoring of incidents involving reasonable force.
- Ensuring any member of staff who uses reasonable force completes the Physical Intervention Report Form.
- Ensuring the Behaviour Policy sets out the circumstances in which reasonable force may be used.
- Responding to complaints, in liaison with the Local Governing Body, regarding the use of reasonable force.
- Ensuring appropriate risk assessments are in place for pupils where the use of restrictive interventions is foreseeable.

### **The SENCO**

The SENCO is responsible for:

- Supporting staff to understand the needs of pupils with SEND in relation to distressed or challenging behaviour.
- Ensuring staff understand how pupils with SEND or medical conditions may experience or respond to restrictive interventions.
- Supporting the development of individual risk assessments and behaviour support plans where appropriate.
- Ensuring teaching staff are aware of agreed strategies, adjustments and risk management plans.
- Monitoring, in collaboration with the Principal, the use of restrictive interventions involving pupils with SEND.

### **The DSL**

The DSL is responsible for:

- Ensuring that incidents involving reasonable force are considered within safeguarding procedures.
- Supporting appropriate follow-up, monitoring and reporting where safeguarding concerns arise.
- Advising the Principal on safeguarding responses to incidents involving restrictive interventions.
- Contributing to the review of this policy alongside the Principal and Local Governing Body.

### All staff

All staff members are responsible for:

- Avoiding restrictive interventions wherever possible and using reasonable force only as a last resort.
- Using reasonable force only where it is lawful, necessary and proportionate.
- Acting in accordance with this policy, statutory guidance and the school's Behaviour Policy.
- Recording and reporting incidents involving restrictive interventions in line with school procedures.
- Maintaining the dignity, safety and wellbeing of pupils at all times.

### 3. Definitions

**Restrictive intervention:** An action or measure used to prevent, limit, or control the movement of a pupil's body, or part of their body. Within this policy, *restrictive intervention* is used as an umbrella term encompassing both physical and non-physical interventions intended to restrict a pupil's movement or behaviour.

**Reasonable force:** A legal term used in legislation which includes physical restrictive interventions. All members of school staff have the statutory power to use reasonable force in limited circumstances. Reasonable force refers to the minimum level of force necessary, applied for the shortest possible duration, and proportionate to the specific circumstances of the incident.

**Significant incident:** Any incident in which the use of force exceeds appropriate physical contact between pupils and staff. This includes situations where physical force is used to carry out or support a non-physical restrictive intervention.

**Seclusion:** A non-disciplinary intervention involving the confinement of a pupil to a space away from others, with their freedom to leave restricted. This may be achieved through physical obstruction, blocking exits, or actions that lead the pupil to believe they will face negative consequences if they attempt to leave.

**Restraint:** A term used in legislation to describe a non-disciplinary intervention that immobilises a pupil or restricts their movement. Restraint may involve direct physical contact or indirect actions. Examples include holding a pupil's arms to their sides or removing an item that enables mobility, such as crutches.

### 4. Avoiding physical intervention and reducing risk

The school will expect staff to assess whether the incident requiring a response can be resolved without physical intervention.

Where possible, the school implements an approach of prevention, where staff will be trained in recognising warning signs of severe pain or distress and/or aggressive behaviour, communicating empathetically with pupils displaying such signs to aid them in regulating their emotions, and altering their environment to minimise distressing stimuli.

Teaching staff will be aware of the behavioural patterns, medical conditions and levels of need of pupils in their class, and will ensure that incidents of disruptive or aggressive behaviour in the classroom are handled in line with individual pupils' needs.

Staff will not generally resort to physical contact or reasonable force immediately without first questioning whether there is a need to use physical intervention. Staff will question whether:

**It is necessary:**

- Staff will consider whether there are other more effective, less restrictive ways to manage a situation.
- Staff will assess whether a restrictive intervention is likely to successfully reduce the relevant risks, or whether its use would escalate the situation further or cause more harm than the behaviour itself.
- Where possible, staff will communicate with other staff members to understand any broader risks in the environment.

**It is proportionate:**

- Staff will use the least amount of force or least restrictive intervention necessary for the least amount of time required to reduce relevant risks.
- If the intervention itself is escalating the situation, staff will reconsider their approach and attempt an alternative strategy.
- Staff will consider the personal circumstances of the pupil, such as medical conditions, SEND or other vulnerabilities, their characteristics such as age and size, and relevant equality implications under the Equality Act 2010.

**The pupil's welfare:**

- Staff will consider the impact on the pupil's overall welfare, balanced against any actions taken.
- Staff will maintain respect for a pupil's dignity.
- Where possible, staff will clearly and calmly communicate to the pupil what is happening, why, and explain what the pupil needs to do.
- For pupils with communication difficulties or EAL, verbal and/or non-verbal strategies will be used to ensure the pupil understands what is happening and has adequate time to process information and respond.
- Staff will seek to understand the pupil's feelings and use this information to determine whether the restrictive intervention should be, or continue to be, applied, reduced or stopped.

Reasonable force will only be used in situations where it is needed to stop a pupil from causing harm to themselves or others, committing a criminal offence, damaging property, or causing disorder among pupils. Any reasonable force used in situations that are non-urgent will only be used once all alternative options have been exhausted and where the staff member in charge deems that the situation is escalating.

The school understands that, in some cases, action may be required very quickly, e.g. in the event that a pupil attempts to run out into a busy road, or where pupils begin a violent fight with one another and staff are forced to pull the pupils apart. Staff will not be penalised for resorting to the use of physical intervention or reasonable force in such situations where it is justified and perceived necessary to prevent harm to others or property in the circumstances.

Positive handling will be applied with the intention of re-establishing verbal control as soon as possible and, at the same time, allowing the pupil to regain self-control. Reasonable force is not used as a method of behaviour management or discipline – only as a last resort in situations that require de-escalation to prevent harm.

## 5. Seclusion

The school will recognise seclusion as a non-disciplinary measure that may be used, in exceptional circumstances, to reduce risk and avoid the need for physical intervention when a pupil is experiencing high levels of emotional or behavioural dysregulation and is not acting with intent.

The school will ensure that seclusion is used only as a safety measure to protect the pupil or others from harm and will not use seclusion as a consequence or through the threat of punishment.

Where seclusion is used, the school will ensure that:

- The space used will be safe, suitable, and not intimidating or threatening to the pupil.
- The pupil will be appropriately supervised at all times.
- The restriction will last only for as long as the immediate risk of harm remains.
- The pupil will be allowed to leave as soon as it is safe to do so.

The school will record and report any incident involving seclusion in accordance with the procedures set out in the recording and reporting incidents section of this policy.

Seclusion will not be used as a disciplinary response to deliberate or wilful misbehaviour. The school will use appropriate disciplinary measures, such as removal from the classroom, in line with the Behaviour Policy.

## 6. Pupils with SEND

The school will have due consideration to how pupils with SEND may react to distressing or confusing situations by displaying behaviours which may be harmful to themselves and others. Staff members will be trained on understanding triggers and how pupils that find communication challenging may express their needs, discomfort or confusion through actions.

The school will seek to minimise the potential disproportionate use of restrictive interventions used on pupils with SEND by understanding underlying triggers of challenging behaviour and providing proactive support.

The SENCO will ensure that the stipulations of the Equality Act 2010 are adhered to in relation to reasonable adjustments, non-discrimination and the Public Sector Equality Duty, and will ensure that staff that come into regular contact with pupils with SEND are aware of the ways in which their needs can be met without reasonable force.

The school will utilise staff who know individual pupils well 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. The school will also work with the pupil, parents and other professionals to develop prevention and de-escalation strategies.

De-escalation strategies may include:

- Removing stimuli that may be causing distress.
- Changing body language, facial expression, or tone of voice.
- Supporting the pupil to express their emotions before they become overwhelmed.
- Engaging the pupil in an activity which can help them manage their feelings of anxiety.
- Distracting the pupil in something that interests them or by introducing familiar objects and activities to redirect their attention.

Staff members will not assume that a technique employed for one pupil with SEND will be applicable to other pupils with SEND.

Where appropriate, staff will work with pupils with SEND and their parents in the co-production of behaviour support plans. These plans will outline any adjustments and methods to communicate their needs effectively. Behaviour support plans will also detail circumstances where it may be appropriate for staff to have increased physical contact with a pupil. Any behaviour support plan will be reviewed with the pupil and their parent periodically and following any significant incident.

Where there is an identified risk, e.g. an increased likelihood in the need to use reasonable force and other physical interventions, the school will put risk assessments in place and mitigate these risks through training and prevention strategies.

The school will adhere to its Special Educational Needs and Disabilities (SEND) Policy at all times.

### **7. Post-incident support**

The school will evaluate all incidents involving the use of restrictive intervention as soon as practicable after the event to understand why it was used, the impact on pupils and staff, any patterns and trends, and how the use of restrictive interventions might be avoided in the future.

If appropriate, the pupil and staff member involved will receive a medical assessment and treatment for any injuries as soon as possible

Follow-up conversations will be used to facilitate reflection, learning and to support pupil and staff wellbeing. Such conversations will be framed as part of the overall debriefing process and seek to understand what happened during the incident and why, based on separate reflections from both the staff and pupils involved. This process will be facilitated by a staff member who was not involved in the incident, with input from an additional person to ensure impartiality and support.

The school will continue to monitor pupil and staff wellbeing and provide additional support if needed. Additionally, any pupil who witnesses an incident of restrictive intervention will also be provided with appropriate support where necessary.

### **8. Recording and reporting incidents**

The Local Governing Body will ensure that a procedure is in place for recording and reporting each significant event in which a staff member uses force on a pupil.

Incidents will be recorded as soon as practicable after the event on the schools CPOMS system. It will be recorded by the staff members involved and they will aim to do this no later than the same day. The requirement to record will apply even if the use of restrictive interventions in certain circumstances is agreed with parents as part of a pupil's behaviour support plan.

The school will record the following details as a minimum:

- Names of pupils and staff directly involved.
- Any relevant needs or circumstances of the pupil, including whether the pupil involved has SEND, and their SEN status code.
- The time, date, location, and approximate duration of the intervention.
- A 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 what type of

reasonable force was applied, the degree of force, and details of any physical injuries sustained.

- A brief account of why the use of force was assessed as necessary in that instance.
- Any post-incident support, e.g. details of any medical treatment for injuries or other adverse impacts.

The school may also record details such as witness accounts, how and when parents were notified, and what follow-up action has taken place.

Records should be retained and analysed by the Principal, and SENCO where physical intervention was used on a pupil with SEND, on a termly basis to ensure that such interventions are being used appropriately, and to identify patterns of behaviour and responses to that behaviour that may require changes to school practice, e.g. increased staff training or further behavioural or emotional support. Records should also be sent to the governing board annually for evaluation.

Where reasonable force or physical restraint has been used, the pupil's parents will be informed unless it appears that doing so would be likely to result in serious harm to the pupil. If the decision is made that the parents cannot be informed as this would place the child at greater risk, the incident will be reported to the LA and the rationale for this recorded.

A report of the incident made to parents will include the following details as a minimum:

- The time, date, location and approximate duration of the intervention.
- A brief account of why the intervention was assessed as necessary.
- A brief account of what type of force was applied, and the degree of force.

The details of any physical injuries sustained, if applicable.

Parents will also be invited to have a follow-up discussion about the incident where appropriate. This may include a discussion about:

- 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.

The Principal will be responsible for conducting a thorough investigation to find out the correct details of what occurred; this may include talking to other pupils about the incident, for instance those who witnessed the event.

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

The Local Governing Body will ensure that a procedure is also in place for recording and reporting any incident involving seclusion or non-physical restrictive intervention, whether or not physical force has been used. This duty applies even where such interventions are agreed with parents as part of a pupil's behaviour support plan.

Incidents involving seclusion or non-physical restrictive intervention will be recorded on the schools CPOMS system as soon as practicable after the event by the staff members involved and, wherever possible, no later than the same day.

For the purposes of this policy, non-physical restrictive interventions include actions that restrict a pupil's movement without direct physical contact, such as preventing a pupil from leaving a space or removing an item that enables mobility.

Parents will be informed of incidents involving seclusion or non-physical restrictive intervention, both in person and in writing, as soon as practicable, and no later than the same day, unless it appears that doing so would be likely to result in serious harm to the pupil. Where parents cannot be informed for this reason, the incident will be reported to the local authority.

Where an incident involving seclusion or non-physical restrictive intervention also constitutes a significant use of force, the school will follow the reporting procedure for significant use of force only, and information will not be duplicated.

Records of seclusion and non-physical restrictive interventions will be retained, monitored, and reviewed alongside records of physical intervention to support oversight, identify patterns or trends, and inform any necessary changes to school practice or pupil support.

### **9. Complaints**

Any complaints regarding the use of restrictive interventions will be dealt with in accordance with the school's Complaints Procedures Policy.

If an allegation regarding inappropriate use of force or other restrictive interventions is made against a staff member, the procedures in Keeping children safe in education will be followed, including the provisions regarding suspension of staff.

### **10. Monitoring and review**

This policy will be reviewed on an annual basis by the Principal, DSL, SENCO and governing board, who will consider any necessary changes and communicate the findings of the review to all members of staff.

## Appendix 1: Glossary of Key Vocabulary

The following table provides the formal definitions for terms used within the Restrictive Interventions and Use of Reasonable Force Policy. These align with current statutory requirements.

| <b>Term</b>                     | <b>Definition</b>   |
|---------------------------------|---|
| <b>Restrictive intervention</b> | An umbrella term for any action or measure used to prevent, limit, or control the movement of a pupil's body, or part of their body.  |
| <b>Reasonable force</b>         | The legal power to use the minimum level of force necessary, applied for the shortest duration, and proportionate to the circumstances to prevent harm, crime, or disorder.   |
| <b>High Risk</b>                | A threshold for incidents involving imminent danger of serious injury, life-threatening behaviour, or complex situations that require formal escalation to the CEO and Board. |
| <b>Significant incident</b>     | Any event where the use of force exceeds appropriate physical contact between pupils and staff, requiring mandatory recording on the CPOMS system.                            |
| <b>Seclusion</b>                | A non-disciplinary safety measure involving the confinement of a pupil to a safe, supervised space away from others, where their freedom to leave is restricted.              |
| <b>Restraint</b>                | A non-disciplinary intervention that immobilises a pupil or restricts their movement, whether through direct physical contact or the removal of mobility aids.                |
| <b>Positive handling</b>        | The application of physical intervention with the specific intent of re-establishing verbal control and allowing the pupil to regain self-control.                            |
| <b>Safe touch</b>               | Physical contact used as a proactive safeguarding measure to support a pupil's wellbeing or to guide them safely within the school environment.                               |
| <b>De-escalation</b>            | Proactive strategies, such as altering the environment or using empathetic communication, designed to minimise triggers and manage distressed behaviour.                      |
| <b>Last resort</b>              | The requirement that physical intervention is only utilised once all alternative non-physical options have been exhausted or are deemed insufficient to prevent harm.         |
| <b>Proportionate</b>            | The principle that an intervention must be the least restrictive option possible, tailored specifically to the pupil's age, size, medical needs, and the level of risk.       |
| <b>Foreseeable risk</b>         | An identified likelihood of a pupil requiring restrictive intervention, which must be managed through individual risk assessments and behaviour support plans.                |