

The Lotus Academy Trust



Supporting children to find opportunities in every difficulty

The Damara School



Specialist SEMH Independent School

Use of Reasonable Force and Restrictive Physical Intervention Policy

Approved by: Trust Board

Initial Ratification: 31 August 2019

Review: Oct 2020; Sep 2022, Feb 2024, Nov

2024, Sep 2025

Next review due by: September 2026

1. Introduction and Legal Framework

This policy sets out The Damara School's approach to the use of reasonable force and restrictive physical intervention (RPI). It should be read in conjunction with the school's Behaviour Policy, Child Protection and Safeguarding Policy, and Health and Safety Policy.

Definitions

In line with DfE statutory guidance (Use of Reasonable Force in Schools, September 2025), we use the following definitions:

Reasonable force: The use of force that is proportionate to the circumstances and necessary to achieve a specific outcome. Force means using physical intervention to direct, guide or compel a pupil to move, or to physically intervene between pupils.

Restrictive intervention: Any intervention that may prevent, restrict or subdue movement or mobility, or uses force to direct or guide a pupil. This includes physical, mechanical or environmental interventions.

Restraint: A restrictive intervention that involves the use of force to restrict movement or mobility.

Legal basis

This policy is based on:

- Section 93 of the Education and Inspections Act 2006, which provides the power for school staff to use reasonable force
- Use of reasonable force in schools (DfE statutory guidance, September 2025)
- Keeping Children Safe in Education (KCSIE) 2025
- The Equality Act 2010
- Health and Safety at Work Act 1974

Section 93 of the Education and Inspections Act 2006 states that a member of staff may use such force as is reasonable in the circumstances for the purpose of preventing a pupil from doing (or continuing to do) any of the following:

- Committing any offence (or, for a pupil under the age of criminal responsibility, what would be an offence for an older pupil)
- Causing personal injury to themselves or others
- Damaging property (including the pupil's own property)

- Prejudicing the maintenance of good order and discipline at the school or among any pupils receiving education at the school, whether during a teaching session or otherwise

The power may be exercised only where the member of staff and the pupil are on the premises of the school, or they are elsewhere and the member of staff has lawful control or charge of the pupil.

Important: The use of force must never constitute corporal punishment.

2. Principles and Philosophy

At The Damara School, we are committed to a therapeutic and holistic approach to behaviour management. The use of reasonable force and restrictive physical intervention is always a **last resort** and should only be used where it is reasonable to do so to prevent harm occurring to the child or others.

Core principles

All use of reasonable force and restrictive physical intervention must:

- **Always be used as a last resort** after all other behaviour management strategies have been exhausted
- Be **necessary and proportionate** to the circumstances
- Be applied using the **minimum amount of force necessary** and for the **minimum amount of time possible**
- Be used in a way that **maintains the safety and dignity** of all concerned
- **Never be used as a form of punishment**
- Take into account the pupil's **age, understanding, sex, and any special educational needs or disabilities**
- Be **recorded as a significant incident** and **reported to parents/carers**

Our commitment to prevention

We recognise that physical intervention should only be employed using 'the minimum degree of force for the shortest possible period'. Our approach prioritises:

Proactive behaviour management through our therapeutic framework
De-escalation techniques and positive behaviour strategies

Individual Positive Handling Plans based on thorough risk assessments
Staff training in trauma-informed approaches and safe intervention techniques
Multi-agency working to support pupils with complex needs

At all times, a **'Duty of Care'** for and to the child is our primary concern.

3. Staff Authorised to Use Reasonable Force

Who may use reasonable force

Only **Senior Leaders who have received appropriate training** in the use of reasonable force and restrictive physical intervention are authorised to use such interventions at The Damara School.

These staff members are:

- Kate Haley, DSL, Head of School
- Julie Cox, Alternate DSL, Assistant Headteacher
- Sandra Govender, Alternate DSL, CEO

All staff, regardless of training, have a legal power to use reasonable force in an **emergency** to prevent injury to themselves or others.

Training requirements

Staff authorised to use restrictive physical intervention must complete:

- **Initial training** in Step Up techniques delivered by the school's accredited Step Up Instructor (Sandra Govender)
- **Annual refresher training** to ensure skills are maintained and appropriate use remains within acceptable practice and legal requirements
- **Termly updates** on behaviour management and de-escalation strategies

New staff will not be permitted to undertake restrictive physical intervention until they have received full training. Arrangements for training will be made at the school's earliest convenience.

All trained staff have their names added to the list of approved users of the techniques, which is maintained by the Head of School.

4. When Reasonable Force May Be Used

Reasonable force may be used where the behaviour of a pupil poses an **immediate risk** and where de-escalation techniques have been unsuccessful or are inappropriate in the circumstances.

Circumstances for use

Trained staff may use reasonable force to prevent a pupil from:

- Committing a criminal offence (or, for a pupil under the age of criminal responsibility, what would be an offence for an older pupil)
- Causing personal injury to themselves or others
- Damaging property (including the pupil's own property)
- Prejudicing the maintenance of good order and discipline at the school

When reasonable force must NOT be used

Reasonable force must never be used:

- As a form of punishment
- To force compliance with staff instructions when there is no immediate risk of harm
- When a pupil is already calm and compliant
- As a first response without attempting de-escalation

5. De-escalation and Prevention Strategies

Before any physical intervention is considered, staff must attempt all appropriate de-escalation and behaviour management strategies.

Primary strategies

Only Senior Leaders who are trained to use RPI must be called for support when staff have tried all other behaviour management strategies, including:

- **Verbal de-escalation techniques** using calm, clear language
- **Distraction and diversion** to alternative activities
- **Use of scripted language** as outlined in the Behaviour Policy
- **Offering the pupil 2 minutes 'headspace'** to self-regulate
- **Use of exit strategy or safe space** (offered or directed)
- **Removing other pupils** from the immediate area to reduce audience and risk
- **Change of adult** if appropriate
- **Tactical ignoring** of attention-seeking behaviour
- **Planned positive distractions**
- **Reassurance and positive touch** (where appropriate and with known pupils)
- **Negotiation, partial agreement, choices and consequences**
- **Take-up time** to allow the pupil to process instructions

Approach script

When a trained Senior Leader arrives to support, they must use the following approach script to attempt to further reduce the need for any physical intervention:

"I have been called because staff have seen that you are struggling and that you are unsafe to yourself, others and/or the environment. If I use restraint, there is a possibility that you may be hurt, so do you want to come with me?"

This script has been developed over time and has proven to reduce the need for physical intervention in most instances. It:

- Acknowledges the pupil's distress
- Explains why intervention may be necessary
- Highlights the risks involved
- Offers the pupil a choice to comply voluntarily
- Maintains the pupil's dignity

6. Use of Positive Handling Plans

The school will devise **Positive Handling Plans** (Appendix 1) informed by individual **Risk Assessments** (Appendix 2) to help pupils make positive behaviour choices.

Purpose of Positive Handling Plans

This planned approach:

- Has the **interests of the child as the primary consideration**
- Pays due consideration to their behaviour and needs
- Includes **intrinsic learning opportunities** for the pupil to own their own behaviour and develop coping strategies
- References the school's Behaviour Policy
- Includes **multi-agency involvement** where appropriate
- Involves and supports both the **child and their parents/carers**

Five main criteria

The Positive Handling Plan is based upon:

- **Involving the pupil from the outset**
- **Promoting and, on occasion, improving curriculum access**
- **Setting a specific target** which aims to reduce physical intervention
- **Changing conditions and approaches** toward the child from one of control to one of cooperation
- **Affording the individual pupil opportunities** to own and subsequently change their behaviour

Review and monitoring

All Positive Handling Plans must be:

- **Reviewed at least termly**, or as the need arises
- Shared with all relevant staff and parents/carers
- Kept in the pupil's file
- Monitored by the Head of School, who is ultimately responsible for their development, implementation and monitoring

The techniques to be used during physical intervention must be clearly recorded on the Positive Handling Plan and shared with all relevant staff and parents/carers.

7. Techniques and Prohibited Holds

Approved techniques

The Damara School uses **Step Up techniques** as the approved method for restrictive physical intervention. All techniques must:

- Be proportionate to the risk and circumstances
- Use the minimum force necessary
- Be applied for the shortest possible time
- Maintain the safety and dignity of the pupil
- Be appropriate to the pupil's age, size, and any disabilities or medical conditions

Specific techniques to be used with individual pupils are documented in their Positive Handling Plans.

Prohibited techniques

The following restrictive techniques must **NEVER** be used under any circumstances:

- **The 'seated double embrace'** which involves two members of staff forcing a person into a sitting position and leaning them forward, while a third monitors breathing
- **The 'double basket-hold'** which involves holding a person's arms across their chest
- **The 'nose distraction technique'** which involves a sharp upward jab under the nose
- **Any hold or technique that restricts breathing**
- **Any intervention that is used primarily to cause pain**
- **Any hold that covers the mouth or nose**
- **Any hold that places pressure on the neck, chest, or abdomen**

These techniques have been identified by a panel of experts as presenting an unacceptable risk when used on children and young people.

8. Health and Safety Considerations

Risk assessment

Procedures for assessing risk, and in particular **pupil-specific risk assessments**, must be undertaken to ensure all aspects of Health and Safety are considered for both pupil and staff.

Individual Risk Assessments (Appendix 2) must consider:

- **Known trigger behaviours** and setting events
- **Seriousness of potential outcomes** (harm to self, peers, staff, property)
- **Probability of behaviours** occurring
- **Severity risk scores** to prioritise intervention strategies
- **Potential triggers and key themes**
- **First signs** that things are not going well
- **Where behaviour typically leads next**
- **Effective strategies** for de-escalation and prevention

Medical considerations

Staff must be aware of any medical conditions that may be relevant to the use of physical intervention, including:

- Asthma or breathing difficulties
- Heart conditions
- Bone or joint conditions
- History of injuries
- Medication that may affect behaviour or physical response

This information must be recorded on the Positive Handling Plan and shared with all staff who may need to intervene.

Post-incident health checks

Pupils who receive physical intervention must be **routinely assessed for signs of injury, pain or psychological distress**. This must be recorded in the Restrictive Physical Intervention record on CPOMS.

Staff involved in physical intervention should also be checked for any injuries and offered appropriate support.

9. Recording, Reporting and Monitoring

What must be recorded

All **significant incidents** involving the use of reasonable force must be recorded on the school's CPOMS system by those staff involved in the incident **as soon as possible and ideally within 24 hours**.

A **significant incident** is defined as any incident where:

- Reasonable force or a restrictive intervention was used
- There was a risk of injury to the pupil, staff member or others
- The incident was prolonged or repeated
- The pupil or staff member was distressed

Recording requirements

For each significant incident, staff must complete:

- **A Major Behaviour Incident record** on CPOMS
- **An RPI record** on CPOMS (where physical intervention was used)

The record must include:

- The **date, time and location** of the incident
- The **names of staff and pupils involved**, and any witnesses
- The **reason force was necessary** (what the pupil was doing, or about to do)
- **How the incident began and progressed**, including:
 - Details of the pupil's behaviour
 - What was said by each of the parties
 - The steps taken to de-escalate and resolve the situation
 - The pupil's response to each intervention
- The **degree of force used**, how it was applied, and for how long
- The **specific technique(s)** used
- Details of any **injury suffered** by the pupil, another pupil, or a member of staff

- Details of any **damage to property**
- **Post-incident health checks** and any signs of injury, pain or psychological distress
- The **outcome** of the incident
- Any **immediate follow-up actions** taken

Informing parents and carers

Parents/carers will be informed of **all significant incidents** involving their child **on the same day**, or as soon as reasonably practicable.

This will normally be done by **telephone**, followed by written confirmation if appropriate.

The information shared with parents/carers will include:

- That an incident occurred involving the use of reasonable force
- The circumstances that led to the use of force
- The type of intervention used
- Any injuries sustained
- The outcome and any follow-up actions

Parents/carers will be **invited to discuss the incident** with the Head of School if they have concerns.

Monthly monitoring and review

The **Head of School, Assistant Headteacher and the Safeguarding Trustee** will review all incidents of restrictive physical intervention on a **monthly basis**.

Review questions will include:

What patterns can be noticed across:

- Pupils involved in RPI
- Setting events (times of day, lessons, social settings, areas in school, etc.)
- The hypothesised function of the incidents
- Staff involved in restrictive physical interventions
- Types of restrictive physical interventions used
- Types of injuries, if any

The implications of these patterns are used for:

- Risk assessment procedures

- Individual Positive Handling Plans and behaviour support strategies
- Staff training (including initial and refresher training in behaviour management, risk assessment and restrictive physical intervention)
- Supervision, timetabling and planning arrangements
- Identifying whether any pupils require additional support or alternative strategies
- Reviewing the effectiveness of de-escalation approaches
- Ensuring compliance with this policy and statutory guidance

10. Post-Incident Support and Restorative Processes

Immediate post-incident support

Following any use of reasonable force, the school will:

- **Check that the pupil and staff members involved are physically unharmed**
- **Provide emotional support** to the pupil and staff as needed
- **Allow time for all parties to calm down** before any discussion
- **Ensure the pupil is supervised** appropriately following the incident
- **Complete health checks** and record any concerns

Restorative processes

As part of our therapeutic approach, we will:

- **Offer the pupil an opportunity to discuss the incident** when they are calm and ready
- Use **restorative approaches** to help the pupil understand:
 - What happened and why
 - The impact of their behaviour on themselves and others
 - What they could do differently next time
 - What support they need to make better choices
- **Identify learning opportunities** for the child to develop alternative strategies
- **Plan for reintegration** back into normal school routines

Review and learning

Following each significant incident, we will:

- **Review the pupil's individual Positive Handling Plan** and risk assessment
- **Consider whether any additional support or adjustments are needed**
- **Identify any lessons learned** for staff or school procedures
- **Update strategies** based on what worked or didn't work
- **Involve parents/carers** in planning next steps

Staff support

Staff involved in physical intervention will be offered:

- Immediate debriefing after the incident
- Opportunity to discuss their feelings and concerns
- Support from senior leaders and colleagues
- Time to complete records accurately and thoroughly
- Access to occupational health or counselling if needed
- Reflection on practice to identify learning and development needs

Staff are encouraged to observe and provide support for each other throughout the year, fostering a culture of mutual support and continuous learning.

11. Equality Act 2010 and Reasonable Adjustments

The school recognises its legal duty under the Equality Act 2010 to make reasonable adjustments for pupils with disabilities and to prevent pupils with protected characteristics from being at a disadvantage.

Our commitment

We will:

- Differentiate our approach to behaviour management to meet the specific needs of pupils with SEND
- Make reasonable adjustments to our behaviour expectations and responses where appropriate
- Consider whether challenging behaviour may be a result of unmet needs or communication difficulties

- Work with pupils, parents/carers and external agencies to develop personalised behaviour support plans
- Regularly review the effectiveness of our approaches for individual pupils
- Ensure that any use of reasonable force takes into account the pupil's age, understanding, sex, and any special educational needs or disabilities

Equality impact

We have carefully considered and analysed the impact of this policy on pupils with protected characteristics to ensure it promotes equality of opportunity and does not inadvertently discriminate.

- Any planned physical intervention must be justified in respect of what is known about the child's needs based upon:
- Multi-disciplinary assessment
- Alternative approaches/behaviour support which have been tried
- An evaluation of the potential risks involved
- Reference to Step Up Techniques and methodology
- Consideration of the child's protected characteristics and individual needs

12. Complaints and Concerns

If parents/carers have concerns

Parents/carers who have concerns about the use of reasonable force with their child should:

- Speak to the Head of School in the first instance
- Request a meeting to discuss the incident and review the records
- Follow the school's complaints procedure if concerns are not resolved
- The school will:
- Listen to concerns with an open mind
- Provide full information about the incident and the reasons for the intervention
- Review the Positive Handling Plan if appropriate
- Consider any adjustments needed to prevent future incidents

If staff have concerns

- Staff who have concerns about the use of reasonable force should:
- Speak to the Head of School or a senior leader

- Follow the school's whistleblowing policy if they believe a colleague has used force inappropriately
- Seek support from their line manager or union representative

Investigating concerns

Any concerns or complaints about the use of reasonable force will be:

- Taken seriously and investigated thoroughly
- Handled in line with the school's complaints policy
- Reviewed by the Head of School and Safeguarding Trustee
- Referred to external agencies if appropriate (e.g., Local Authority Designated Officer if there are safeguarding concerns)

13. Links to Other Policies

This policy should be read in conjunction with:

- Behaviour Policy - sets out the school's overall approach to behaviour management
- Child Protection and Safeguarding Policy - includes procedures for reporting concerns
- Health and Safety Policy - covers risk assessment and staff wellbeing
- Anti-Bullying Policy - addresses peer-on-peer harm
- SEND Policy - outlines support for pupils with additional needs
- Equality Policy - sets out the school's commitment to equality and inclusion
- Complaints Policy - explains how to raise concerns
- Whistleblowing Policy - covers reporting of staff conduct concerns

14. Monitoring and Review

Policy review

This policy will be reviewed annually by the Head of School and approved by the Trust Board.

The review will consider:

- Changes to statutory guidance and legal requirements
- Patterns and trends in the use of reasonable force

- Feedback from staff, pupils and parents/carers
- Outcomes of incident reviews and lessons learned
- Effectiveness of training and support for staff
- Impact on pupils with protected characteristics

Ongoing monitoring

The Head of School, Assistant Headteacher and Safeguarding Trustee will:

- Review all RPI incidents monthly to identify patterns and trends
- Monitor the effectiveness of Positive Handling Plans
- Ensure staff training is up to date and effective
- Report to the Trust Board on the use of reasonable force termly
- Identify areas for improvement in policy and practice
- Quality assurance

The school will:

- Audit recording practices to ensure compliance with this policy
- Review Positive Handling Plans to ensure they are effective and up to date
- Seek feedback from pupils and parents/carers about their experiences
- Benchmark practice against other specialist SEMH schools
- Engage with external advisors to validate our approach

15. Roles and Responsibilities

The Trust Board is responsible for:

- Approving this policy and ensuring it is compliant with statutory guidance
- Monitoring the use of reasonable force through termly reports
- Ensuring adequate resources are available for staff training
- Reviewing the policy annually

The Head of School is responsible for:

- Implementing this policy and ensuring all staff understand it
- Ensuring staff receive appropriate training
- Authorising staff to use restrictive physical intervention
- Maintaining the list of trained staff
- Overseeing the development and monitoring of Positive Handling Plans
- Reviewing all significant incidents and identifying learning

- Reporting to the Trust Board on the use of reasonable force
- Liaising with parents/carers following incidents
- Investigating any concerns or complaints

The Safeguarding Trustee is responsible for:

- Reviewing RPI incidents monthly with the Head of School
- Ensuring safeguarding procedures are followed
- Monitoring patterns and trends
- Challenging practice where necessary

Senior Leaders authorised to use RPI are responsible for:

- Using reasonable force only as a last resort and in line with this policy
- Following de-escalation procedures before using physical intervention
- Using only approved Step Up techniques
- Recording all significant incidents accurately and promptly
- Informing parents/carers on the same day
- Participating in post-incident reviews and learning
- Supporting colleagues who may need to use reasonable force

All staff are responsible for:

- Understanding this policy and the school's Behaviour Policy
- Using de-escalation strategies to prevent the need for physical intervention
- Calling for support from trained Senior Leaders when needed
- Supporting colleagues during and after incidents
- Recording incidents accurately on CPOMS
- Maintaining confidentiality
- Participating in training and professional development

The Step Up Instructor (Sandra Govender) is responsible for:

- Providing initial and refresher training to staff
- Ensuring training is compliant with Step Up methodology and statutory guidance
- Maintaining records of staff training
- Advising on techniques and best practice
- Supporting staff to develop and implement Positive Handling Plans

Appendix 1: Positive Handling Plan Template

Date of 1st plan:;

Review Date:

Name of pupil:;

Year:

Vulnerable Pupil Category:;

ADDITIONAL INFORMATION

(e.g., Medical Data: known medication/Asthma/Nose bleeds/physical conditions that may affect use of restraint)

This information is vital if appropriate positive handling strategies are to be implemented. Any strategies must be on an individual needs basis.

TRIGGER BEHAVIOURS

(Describe situations/behaviours which are known to have led to Positive Handling being required)

Link to risk assessment. As part of the process it is important to evaluate current practice and collate data that affords the school with the opportunity to accurately assess environmental factors that may be influencing a child's behaviour.

TARGET

A target should be set that is SMART and that looks to reduce the number of physical interventions over a specific time-scale. The target should be based upon pre-requisite information about the child and/or baseline data.

SUCCESS CRITERIA

This section should include additional resources that may be required to meet the target.

PREFERRED SUPPORTIVE STRATEGIES

(Underline/Describe strategies which, when and where possible, should be attempted before physical restraint is used)

Verbal advice/support, Planned positive distractions (what?), Reassurance/Positive touch (who?), Tactical ignoring

Descriptions of reality, Take up time, Negotiation/Partial agreement, Use of 'safe space' (offered/directed)

Change of adult, Choices/limits/consequences, 2 minutes 'headspace', Other

This section links the behaviour policy of the school with the overall process of positive handling. Primary and secondary strategies that should be employed as whole school approaches are outlined and agreed prior to physical intervention taking place.

APPROACH SCRIPT

When a trained Senior Leader arrives, they will use the following script:

"I have been called because staff have seen that you are struggling and that you are unsafe to yourself, others and/or the environment. If I use restraint, there is a possibility that you may be hurt, so do you want to come with me?"

PREFERRED HANDLING STRATEGIES

(Describe the preferred staff responses/holds)

It is important that the strategies for responding to individual behaviours are personalised in respect of meeting the needs of the pupil who presents the behaviour.

Technique (In line with Step Up Training), Standing/Sitting (Graded in terms of severity of intervention), Number of staff (Where appropriate staff should be named and have received training), Breakaway Techniques (Staff should not physically intervene if they are not confident or competent)

Note: Only approved Step Up techniques may be used. Prohibited techniques (seated double embrace, double basket-hold, nose distraction technique) must NEVER be used.

RESTORATIVE PROCESSES FOLLOWING THE INCIDENT

What learning opportunities exist for the child? How will the child be reintegrated back into school? This is the medium which enables the child to begin to own their own behaviour and in turn develop alternative strategies.

Post-incident support will include:

Health check for signs of injury, pain or psychological distress

Time to calm down

Restorative conversation when ready

Discussion of what happened and why

Exploration of alternative strategies

Plan for successful reintegration

EVALUATION

(This section is to be completed during the review)

Over time, behaviour patterns of individual pupils will change as will the benefits and risks associated with any physical intervention. Each review should include a formal meeting of all relevant personnel involved and the success of the plan should be measured against the original target.

Review date:

Attendees:

Progress against target:

Changes to plan:

Next review date:

SIGNATURES:

Role, Name, Signature, Date

Head of School or SLT:, , ,

Parent/Carer:, , ,

Staff authorised to use techniques:, , ,

Staff authorised to use techniques:, , ,

Other (e.g., Social Worker):, , ,

Pupil:, , ,

Appendix 2: Individual Risk Assessment

Pupil Specific Risk Assessment

Name of pupil:,

Year Group:,

Date of Initial Assessment:, Review Date:

RISK ASSESSMENT MATRIX

Hazard/Behaviour, Opinion Known (O/K), Deliberate/Accidental/Involuntary (D/A/I),
Seriousness of Outcome (A) 1/2/3/4, Probability of Hazard (B) 1/2/3/4, Severity Risk
Score (A × B)

Harm to Self, , , , ,

Harm to Peers, , , , ,

Harm to Staff, , , , ,

Damage to property, , , , ,

Harm from Disruption, , , , ,

Criminal Offence, , , , ,

Harm from Absconding, , , , ,

Other Harm, , , , ,

Note: Risks which score 6 or more (probability × seriousness) should have strategies listed in the Positive Handling Plan.

SERIOUSNESS SCALE

Score, Description

- 4, Foreseeable outcome is loss of life or permanent disability, emotional trauma requiring counselling or critical property damage
- 3, Foreseeable outcome is hospitalisation, significant distress, extensive damage
- 2, Foreseeable outcome is harm requiring first aid, distress or minor damage
- 1, Foreseeable outcome is upset or disruption

PROBABILITY SCALE

Score, Description

- 4, The Risk of Harm is persistent and constant
- 3, The 'Risk of Harm' is more likely than not to occur again
- 2, The 'Risk of Harm' has occurred within the last 12 months; the context has changed to make a reoccurrence unlikely
- 1, There is evidence of historical risk, but the behaviour has been dormant for over 12 months and no identified triggers remain

POTENTIAL TRIGGERS/KEY THEMES

First signs that things are not going well:

Where their behaviour leads next:

Strategies to prevent escalation:

Completed by:

Name: _____ Role: _____ Date: _____

Reviewed by:

Name: _____ Role: _____ Date: _____

