



# Horizons Therapeutic Education Trust

## Restrictive Interventions, Reasonable Force and Seclusion Policy

Policy | Updated for Trust Board approval: 11 May 2026

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| <b>Trust / setting</b>           | Horizons Therapeutic Education Trust (HTET)                    |
| <b>Policy owner</b>              | CEO / DSL / Behaviour Lead                                     |
| <b>Version</b>                   | 2.0  |
| <b>Approval route</b>            | Trust Board  |
| <b>Next review</b>               | May 2027 or sooner if statutory guidance changes               |
| <b>Publication / circulation</b> | Website and all HTET employees, trustees and relevant partners |

### Summary of May 2026 revisions

| Area                | Revision made  | Board assurance point                                      |
|---------------------|--|--|
| DfE 2026 guidance   | Policy rewritten to reflect DfE Restrictive Interventions guidance effective from 1 April 2026.                        | Meets new statutory recording/reporting expectations.      |
| Terminology         | Updated definitions of restrictive intervention, reasonable force, restraint, seclusion and significant incident.      | Provides consistent terminology across staff and trustees. |
| Recording/reporting | Added same-day written recording and parent/carer reporting expectations, including seclusion and non-force restraint. | High priority for compliance.                              |
| Training            | Added requirement for adequate training for staff likely to use reasonable force/restrictive interventions.            | Links to Board decision on provider and cost.              |

| Area            | Revision made   | Board assurance point                         |
|-----------------|---|---|
| Data governance | Added Trust Board review of restrictive intervention data and patterns. | Supports safeguarding and equality assurance. |

## Policy statement

HTET is a therapeutic education provider. The Trust's approach is to prevent escalation through safe relationships, clear routines, de-escalation, trauma-informed practice, NVR-informed language, risk assessment, reasonable adjustments and multi-agency planning. Restrictive intervention is a last resort and must only be used when lawful, necessary, reasonable, proportionate and for the shortest time possible.

This policy replaces any previous HTET policy wording based primarily on the 2013 reasonable-force guidance. It is updated to reflect the DfE restrictive intervention guidance effective from 1 April 2026 and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.

## Definitions

| Term                            | HTET policy definition   |
|---------------------------------|--|
| <b>Restrictive intervention</b> | A means to prevent, restrict or subdue movement of the body, or part of the body, of a pupil. This includes physical and non-physical actions aimed to restrain pupils in different ways.  |
| <b>Reasonable force</b>         | A term used in legislation which includes physical restrictive interventions. Force must be no more than necessary and used for the least amount of time depending on the circumstances.   |
| <b>Significant incident</b>     | Any incident where the use of force goes beyond appropriate physical contact between pupils and staff. This includes when physical force is used to implement a non-physical restrictive intervention.                               |
| <b>Restraint</b>                | A non-disciplinary intervention which immobilises a pupil or limits movement. It may or may not include direct physical contact.   |
| <b>Seclusion</b>                | A non-disciplinary intervention involving keeping a pupil confined to a place away from others and preventing them from leaving by physical obstruction, blocking or making them believe they will be punished if they try to leave. |

## Who may use reasonable force

All members of school staff have a legal power to use reasonable force in certain circumstances. HTET expects only trained staff, or staff acting in an emergency to prevent immediate harm, to use restrictive intervention. Staff must use professional judgement and act within this policy, their training and the law.

## When restrictive intervention may be used

Reasonable force or other restrictive intervention may be used to prevent or stop a pupil from:

- causing injury to themselves or others;
- committing a criminal offence;
- damaging property;
- causing disorder among pupils at the school, whether during a teaching session or otherwise.

Restrictive intervention must not be used as punishment, to secure compliance for convenience, because of staff frustration or as a substitute for appropriate staffing, planning, reasonable adjustments or de-escalation.

## Decision-making test

- Is it necessary? Are there other more effective, less restrictive ways to manage the situation?
- Is it proportionate? Is the degree and duration of intervention the minimum required?
- Is it in the pupil's best interests and directed at preventing harm or serious disorder?
- Have the pupil's SEND, disability, trauma, mental health, communication and sensory needs been considered?
- Can the intervention be ended safely and quickly?
- Can another adult observe, support or call for help where possible?

## Prevention and de-escalation

HTET will prioritise prevention and de-escalation through:

- positive relationships, predictable routines and relational practice;
- NVR-informed adult presence, calm language, repair and support networks;
- individual risk assessments, behaviour support plans and safety plans;
- reasonable adjustments for SEND, disability, communication, sensory and mental health needs;
- staff training in de-escalation, safe positioning, dynamic risk assessment and post-incident repair;
- MDT formulation, clinical consultation and reflective supervision;
- environmental adjustments to reduce known triggers and crowding;
- regular review of incidents, patterns and near misses.

## Pupils with SEND, disability or health needs

For pupils with SEND, disability, EHCPs, sensory needs, communication needs, trauma or mental health needs, HTET will work with parents/carers, commissioners and professionals to identify triggers, warning signs, reasonable adjustments, preferred de-escalation strategies and post-incident support. Plans must be reviewed periodically and after any significant incident.

## Seclusion

Seclusion is not a disciplinary response. Where used in exceptional circumstances to reduce immediate risk, the place must be safe, not threatening or intimidating, and the pupil must be supervised at all times. The pupil must be allowed to leave as soon as the immediate risk has reduced. Any seclusion incident must be recorded and reported under this policy.

## Training

Staff who are likely to need to use reasonable force and/or other restrictive interventions must be adequately trained in safe and lawful use and in preventative strategies. The Trust Board will ensure that the selected training provider and model are suitable for HTET's AP, SEND, trauma-informed and safeguarding context.

Training records must be maintained and cross-checked against role, site, risk profile, refreshers and induction. Training must not be treated as permission to use restrictive intervention where it is not necessary or proportionate.

## Recording significant use of force

HTET must have a procedure for recording each significant incident in which a member of staff uses force on a pupil. Incidents must be recorded as soon as practicable after the event. The staff member(s) involved should endeavour to complete the written record no later than the same day.

The record must include as a minimum:

- names of pupil and staff directly involved;
- relevant needs or circumstances of the pupil, including SEND/disability and SEN status code where applicable;
- time, date, location and approximate duration of the intervention;
- what led up to the incident, triggers if known, preventative or de-escalation strategies used;
- type and degree of reasonable force used, where relevant;
- why the use of force was assessed as necessary;
- details of injuries, medical treatment and post-incident support;
- pupil, staff and witness accounts where appropriate;
- parent/carer/local authority notification and follow-up actions;
- lessons learned and whether the behaviour support plan/risk assessment has been updated.

## Reporting to parents/carers and local authority

HTET must report each significant use of force to the parent(s) of the pupil involved as soon as practicable after the incident and should endeavour to do so no later than the same day. For children in care, "parent" includes carers and the local authority where it is providing accommodation under section 20 of the Children Act 1989; the social worker and Virtual School should be informed as appropriate.

Reports should normally be in writing and include the time, date, location, approximate duration, why the intervention was assessed as necessary, the type and degree of force used and any injuries. Exceptions apply where reporting would be likely to result in serious harm to the pupil; in such cases the DSL/CEO must determine who can safely be informed and record the rationale.

## Recording and reporting seclusion and non-force restraint

HTET must record each seclusion or restraint incident, including restraint without direct physical contact. Incidents must be recorded as soon as practicable and staff should endeavour to do so no later than the same day. Parents/carers must be informed as soon as practicable and staff should endeavour to do this no later than the same day, subject to the serious-harm exception set out above.

## Post-incident support and review

- Check for injury and seek medical assistance where required.
- Provide emotional support to the pupil and staff involved.
- Hold a restorative/reflection conversation when the pupil is ready and it is safe to do so.
- Inform the DSL and record any safeguarding concern.
- Review risk assessment, behaviour support plan, reasonable adjustments and staffing arrangements.
- Consider whether external notification is required, including social worker, commissioner, Ofsted, LADO, RIDDOR/HSE or police depending on circumstances.

## Data review and governance

The CEO, DSL and Behaviour Lead will review restrictive intervention data regularly. Trustees will receive termly or more frequent reports where risk requires it. Reports should include frequency, type, location, time, pupil characteristics, injuries, follow-up, training implications, equality considerations and actions to reduce future use.

## Complaints and allegations

Complaints or allegations about use of force, restraint or seclusion will be managed under HTET complaints, safeguarding and allegations procedures. Where an allegation may meet the threshold for harm or suitability concerns, the LADO process must be followed without delay.

## Key statutory and regulatory framework

- Keeping Children Safe in Education 2025 (KCSIE 2025), statutory guidance for schools and colleges.
- SEND Code of Practice: 0 to 25 years.
- Equality Act 2010, including the Public Sector Equality Duty and reasonable-adjustment duties.
- DfE Restrictive Interventions, including the Use of Reasonable Force in Schools, effective from 1 April 2026.
- Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.
- Education and Inspections Act 2006, sections 93 and 93A.

Where statutory guidance changes, the CEO, DSL, CFO and/or relevant policy owner will review the affected policy and bring amendments to the Trust Board or appropriate committee at the earliest practical point.

## Approval and review

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| <b>Approved by</b>                         | Trust Board                                      |
| <b>Date approved</b>                       | 11 May 2026                                      |
| <b>Next review date</b>                    | May 2027 or sooner if statutory guidance changes |
| <b>Policy owner responsible for review</b> | CEO / Senior Leadership Team                     |