



Vita et Pax Preparatory School
Established 1936

Restrictive Interventions Policy

Policy Originator	Head of Operations
Approval	Creation authorised by Governing Body resolution, 28 August 2026; text for ratification at the next meeting
Status	Statutory — Independent School Standards 16A and 32A
In force from	1 April 2026 (ISI inspects against these standards from 1 September 2026)
Review Period	Annually

1. Purpose, Status and Scope

This policy sets out how Vita et Pax Preparatory School records, reports and reviews any use of reasonable force, seclusion or restraint involving a pupil. It gives effect to Standard 16A (recording) and Standard 32A (reporting to parents) of the Education (Independent School Standards) Regulations 2014, inserted by the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025, which came into force on 1 April 2026. ISI is expected to inspect against these standards from 1 September 2026.

It should be read alongside the Department for Education's statutory guidance Restrictive interventions, including use of reasonable force, in schools (the statutory portion of which begins at page 14), section 93 of the Education and Inspections Act 2006, and the separate recording duty under section 93A of that Act.

This policy applies to every adult working with pupils — teaching and support staff, senior leaders, peripatetic and supply staff, volunteers, and staff of external providers operating on the school site — and to pupils of all ages from Nursery (Little Vitas) to Year 6, including the Early Years Foundation Stage. Paragraph 16A(6) defines “staff” as including supply staff and volunteers.

The reporting and recording expectations in this policy extend to every adult working with pupils. The statutory power to use reasonable force does not. Under section 93 of the Education and Inspections Act 2006 that power belongs to members of school staff and to any other person whom the Head Teacher has expressly authorised to have lawful control or charge of pupils. No visitor, contractor or employee of an external provider is authorised to use force merely by being on the school site.

2. The School's Position

Vita et Pax is a preparatory school for children aged two to eleven. The school's approach to behaviour is founded on relationships, clear expectations and early de-escalation, as set out in the Behaviour & Discipline Policy. Restrictive intervention is a last resort, used only where it is necessary to prevent harm and where no less intrusive response would be effective.

2.1 The Wellbeing Room

The wellbeing room is a small, supervised teaching space used for one-to-one pastoral and SEND work and for individual music tuition, including piano lessons. Ordinary use is a lesson or a support session, not a sanction. It is not used as an isolation room, and the school does not use isolation as a behaviour management technique.

The presence of an adult does not decide whether an incident is seclusion. Paragraph 16A(4) defines seclusion as detaining one pupil apart from any other person except staff — so a pupil alone with a member of staff is within the definition if they are detained. What matters is whether the pupil was free to leave, as set out at section 3.3.

If a pupil in this room, or anywhere else in the school, is not free to leave — because the way out is obstructed, because the room is secured, or because they reasonably believe they will be punished if they go — that is seclusion, and sections 5 and 6 apply. Staff do not tell a pupil to remain until they are calm, or until an adult decides they may go; if a pupil wishes to return to class, they may. Where staff are uncertain whether an incident was seclusion, it is recorded as seclusion. Under-recording is a compliance failure; over-recording is not.

The Head Teacher keeps use of the room under review. Repeated withdrawal of the same pupil from class is treated as a possible unmet need, and triggers consideration of a behaviour support plan or a SEND referral.

3. Definitions

3.1 Reasonable force

The use of physical contact to control or restrain a pupil. It ranges from guiding a pupil to safety by the arm, to more restrictive holding. Force may be used to prevent a pupil from committing an offence, causing injury to themselves or others, damaging property, or seriously prejudicing good order and discipline.

3.2 Restraint and immobilisation

A member of staff restrains or immobilises a pupil if they restrict the pupil's movement otherwise than as a disciplinary penalty (paragraph 16A(5)). This is not limited to physical holding. It includes:

- holding, or binding, any part of a pupil's body;
- securing a pupil to a fixed object;
- depriving a pupil of an auxiliary aid or mobility aid, for example removing a walking frame or wheelchair, where doing so restricts the pupil's movement.

3.3 Seclusion

This is the definition staff most often get wrong, and it is wider than it sounds. Under paragraph 16A(4), staff seclude a pupil if they detain that one pupil in a place apart from any other person (except staff), otherwise than as a disciplinary penalty — including by:

- physically obstructing the pupil's way of leaving the place;
- securing the place so that the pupil cannot leave it; or
- causing the pupil to believe that they will be punished if they leave.

Those three are examples of how a pupil may be detained, not additional conditions that must all be met. A held door handle or a blocked doorway is seclusion even if nothing is said about punishment, and even if the pupil does not object.

Two points staff regularly miss. First, an adult being present does not prevent it being seclusion — the definition is “apart from any other person except staff”, so a one-to-one behind a closed door is caught if the pupil is detained. Second, the setting is irrelevant: a corridor, an empty classroom, an office or a quiet room are all capable of being the “place”.

It follows that every separation of a pupil from others falls into one of three categories:

- a disciplinary penalty, imposed under the Behaviour & Discipline Policy and logged as a sanction — expressly outside the definition, and not recorded under this policy;
- genuinely voluntary, where the pupil may leave whenever they choose and knows it — not seclusion;
- seclusion, which is recorded under section 5 and reported to parents under section 6.

Staff should assume that if they would be surprised to see the pupil simply walk away, the pupil was detained. Where there is doubt, the incident is recorded as seclusion.

3.4 What is not covered

- A formal detention properly imposed under the Behaviour & Discipline Policy.
- Ordinary physical contact — comfort, first aid, supporting a pupil in PE or a practical activity, or guiding a young child by the hand in the normal course of the school day.
- A pupil choosing to withdraw to an agreed space and being free to return at will.

4. Principles Governing Use

1. Last resort. De-escalation is attempted first in every case where it is safe to do so.
2. Necessity. Force is used only where there is no realistic alternative and the risk of not acting is greater than the risk of acting.
3. Proportionality. The degree and duration of force must be the minimum needed, and must be proportionate to the consequences it is intended to prevent.
4. Dignity. The pupil's dignity, age, understanding, SEND and any medical condition are taken into account throughout.
5. No punishment. Restrictive intervention is never used as a punishment, to secure compliance with an instruction, or for staff convenience.
6. Recording. Every instance is recorded, whether or not it formed part of an agreed behaviour support plan.

Pupils with SEND are over-represented nationally in restrictive intervention incidents. Where a pupil has a behaviour support plan or an EHC plan, the agreed strategies are followed; the existence of such a plan does not remove the duty to record and report each incident.

5. Recording (Standard 16A)

The school keeps two recording procedures, as paragraph 16A(1) requires:

- 16A(1)(a) — each use of force incident, recorded in accordance with section 93A of the Education and Inspections Act 2006. Section 93A applies to each significant incident in which a member of staff uses force.
- 16A(1)(b) — each incident in which a member of staff secludes, restrains or immobilises a pupil. There is no significance threshold here: every such incident is recorded.

Where a single incident falls under both, it is recorded once, under the section 93A procedure, in accordance with paragraph 16A(3). That provision works one way only: an incident of seclusion, restraint or immobilisation in which no force was used cannot be recorded on the use-of-force route, and must be recorded under 16A(1)(b).

Both routes are recorded on CPOMS under the category Restrictive intervention, with a mandatory field identifying which route applies. The record is made in writing as soon as practicable after the incident, by the member of staff involved or a witness, and in any event within 24 hours. Each record contains:

- the name of the pupil, and the names of all staff involved and any witnesses;
- the pupil's SEND status and any relevant needs, including medical needs;
- the date, time, location and duration of the incident;
- a brief factual account of what happened and what led to it;
- which route applies — significant use of force, or seclusion, restraint or immobilisation;
- the de-escalation strategies attempted first;
- where force was used, its type and degree, by whom, and why it was judged necessary at the time;
- where the pupil was secluded, how they were detained — the way out obstructed, the place secured, or the pupil caused to believe they would be punished for leaving — and for how long;
- any injury to anyone, and any first aid given;
- the support provided to the pupil afterwards, and to staff;
- the date, time and method by which each parent was informed, or the reason a parent was not informed.

The Designated Safeguarding Lead reviews every record. Records are retained in line with the school's retention schedule and are available to the Governing Body and to inspectors on request.

6. Reporting to Parents (Standard 32A)

Paragraph 32A applies to both recording procedures. Information about each significant use of force incident and each seclusion, restraint or immobilisation incident is provided to each parent of the pupil as soon as practicable after the incident.

"Parent" has the meaning given by section 576 of the Education Act 1996, and includes a local authority providing accommodation for the pupil under section 20 of the Children Act 1989. Where parents live

apart, each of them is informed.

The school's standard is a telephone call on the same day, followed by written confirmation by email, normally before the end of the following school day. The written information covers:

- the date, time, location and duration of the incident;
- what happened and why the intervention was judged necessary;
- where force was used, its type and degree;
- any injury sustained by the pupil;
- the support given to the pupil afterwards, and any follow-up arranged.

6.1 The safeguarding exception

Paragraph 32A(2) creates a two-stage exception, and it is important that staff apply both stages rather than stopping at the first:

1. Information must not be given to a particular parent if it appears that doing so would be likely to result in significant harm to the pupil. That parent is not told.
2. Any other parent who can safely be told must still be told. The exception is parent-specific, not incident-specific.
3. Only if there is no parent who could be told without that risk is the information instead provided to the local authority within whose area the pupil is ordinarily resident.

The decision is taken by the Designated Safeguarding Lead, recorded with its reasons, and reported to the Chair of the Governing Body.

Paragraph 32A(1)(a) also excepts pupils aged 20 or over. Given the school's age range of two to eleven, this has no application at Vita et Pax.

7. After an Incident

- The pupil is checked for injury, offered first aid, and given time and support to recover before returning to normal activity.
- The staff involved are supported by a senior leader, and a debrief is held.
- The Head Teacher and DSL consider whether the incident indicates an unmet need, and whether a behaviour support plan or risk assessment should be created or revised.
- Where the incident raises a safeguarding concern about a member of staff, the allegations procedure in the Child Protection & Safeguarding Policy applies.
- Parents are offered a meeting where the incident was significant or where they request one.

8. Training

All staff receive briefing on this policy as part of induction and annually thereafter. The briefing covers de-escalation, the legal position on reasonable force and, specifically, the definition of seclusion at section 3.3 — including the point that a cool-off space or corridor becomes seclusion when a pupil does not believe they are free to leave. Staff are briefed on the language they use in the moment, because what a pupil understands about whether they may leave is what determines how the incident is classified.

Training records are held by the Head of Operations and are available for inspection.

9. Complaints

A parent who is concerned about the use of restrictive intervention may raise the matter under the school's Complaints Policy. Where the concern is that a pupil has been harmed, the Child Protection & Safeguarding Policy applies and the matter is referred to the Designated Safeguarding Lead without delay.

10. Monitoring, Governance and Review

The Head Teacher reports to the Governing Body at each meeting on the number of incidents recorded under this policy, any patterns identified, and any resulting changes to practice. A nil return is reported as such. The Governing Body reviews this policy annually.

11. Related Policies

- Behaviour & Discipline Policy — sanctions, and the distinction between a disciplinary penalty and seclusion.
- Child Protection & Safeguarding Policy — allegations, and safeguarding referrals arising from an incident.
- SEND Policy — behaviour support plans and reasonable adjustments.
- Health & Safety Policy and First Aid Policy — injury and first aid.
- Complaints Policy — parental complaints.

Creation authorised by: Governing Body resolution of 28 August 2026. Text awaiting ratification at the next meeting of the Governing Body.