

Positive Handling and Safe Touch Policy

Policy Code:	HR9
Policy Start Date:	September 2025; Updated March 2026
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Please read this policy in conjunction with the policies listed below:

- HR6 Data Protection Policy
- HR6A Data Breach Policy
- HR12 Staff Disciplinary Policy
- HR24 Policy for Allegations of Abuse Made Against Adults
- HR36 Complaints Policy
- HR42 Low-Level Concerns Policy
- HS2 Medical Treatment Policy
- SW1 Intimate Care Policy
- SW2 Exclusion Policy
- SW4 Student Behaviour and Discipline Policy
- SW5 Safeguarding and Child Protection Policy
- SW9 Parental Communications and Complaints Policy
- SW11 Educational Visits Policy
- SW17 Safeguarding Adults Policy
- TL6 SEND Policy

1 Policy Statement

1.1 This policy sets out the Trust's approach to positive handling, including restrictive intervention, seclusion and safe touch. This policy is based on guidance outlined in the DfE document *Restrictive interventions, including use of reasonable force, in schools* and the following legislation:

- *the Education and Inspections Act 2006;*
- *the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025;*
- *the Health and Safety at Work etc. Act 1974 and associated regulations;*
- *the Human Rights Act 1998; and*
- *the Equality Act 2010.*

1.2 The Trust recognises that children learn who they are and how the world is by forming relationships with people and things around them. The quality of a child's relationship with significant adults is vital to their healthy development and emotional health and wellbeing. Some pupils within the Trust who require emotional support from staff may have been subject to trauma or distress. It is with this in mind that staff seek to respond to children's developmental needs by using appropriate safe touch.

1.3 References to the Trust or Academy within this policy specifically include all primary, secondary and special academies within the Trust, as well as the Early Years setting at the Priory Witham Academy, Priory Apprenticeships and Lincolnshire ITT.

1.4 This policy does not form part of any member of staff's contract of employment and it may be amended at any time.

2 Roles, Responsibility and Implementation

2.1 The Pay, Performance and HR Committee has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Director of Safeguarding.

2.2 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all staff are responsible for supporting colleagues and ensuring its success.

3 Aims

3.1 To ensure that settings proactively minimise the need to use restrictive interventions through early support, prevention and de-escalation strategies.

- 3.2 To ensure that if restrictive intervention is necessary, staff feel confident in knowing how to use interventions safely, appropriately and lawfully.
- 3.3 To ensure that staff understand what safe touch is, and how physical contact can be used safely and appropriately.

4 Definitions

4.1 **Restrictive intervention** – a means to prevent, restrict or subdue movement of the body or part of the body, of a pupil. For the purpose of this policy, the term ‘restrictive intervention’ is used to cover both physical and non-physical actions aimed to restrain pupils in different ways.

4.2 **Reasonable force** – refers to the amount of force that staff members can legally use to temporarily restrict a pupil’s movement. Reasonable means using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances. All members of school staff have the legal power to use reasonable force in limited circumstances.

‘Force’ is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury. ‘Control’ means either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of a classroom.

4.3 **Restraint** – a term in legislation referring to a non-disciplinary intervention which immobilises a pupil or limits their movement. This may or may not include direct physical contact. For example, holding a pupil’s arms to their sides or removing a pupil’s crutches would both be considered a form of restraint.

4.4 **Significant incident** – any incident where the use of force goes beyond appropriate physical contact between pupils and staff as described in Section 16 of this policy.

4.5 **Seclusion** – a non-disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving.

5 Who can use reasonable force?

5.1 All members of school staff have a legal power to use reasonable force in certain circumstances.

5.2 Staff have a legal power to use reasonable force to prevent or stop a pupil from:

1. causing injury to themselves or others;

2. committing a criminal offence;
3. damaging property; and/or
4. causing disorder among pupils at the school, whether during a teaching session or otherwise.

- 5.3 The decision on whether to use reasonable force is down to the professional judgement of the teacher or other adult involved. Whether the force used is reasonable will always depend on the particular circumstances of the case. The use of force is reasonable if it is proportionate to the consequences it is intended to prevent. This means the degree of force used should be no more than is needed to achieve the desired result.
- 5.4 Staff should always try to avoid acting in a way that might cause injury, but in extreme cases it may not always be possible to avoid injuring the pupil. Where appropriate, the pupil should receive a medical assessment and treatment for any injuries as soon as possible.

6 Unacceptable uses of force

- 6.1 It is illegal to use force on a pupil for the purpose of punishment.
- 6.2 Pupils should not be restrained in a way that affects their airway, breathing or circulation, for example, by covering the mouth and/or nose, or applying pressure to the neck region or abdomen.
- 6.3 If a pupil is unintentionally held on the ground, staff should release their holds or re-position into a safer alternative or standing position as quickly as possible.
- 6.6 Staff should always avoid touching/holding a pupil in a way that might be considered inappropriate. Force, where used, should always be reasonable; it should always be proportional to the circumstances of the incident. It should be used only to control or restrain and never to with the intent to cause pain or harm. In any action due regard has to be given to the age, understanding, sex, special educational need or disability, past experience and cultural and religious heritage of the pupil.

7 Use of reasonable force to search pupils

- 7.1 Headteachers and staff they authorise have a statutory power to search a pupil or their possessions where they have reasonable grounds to suspect that a pupil may have a prohibited item (please see SW4 Student Behaviour and Discipline Policy for further information). A member of staff can use such force as is reasonable to search for legally prohibited items, but not to search for items banned under the Trust's policy.

8 Seclusion

- 8.1 Seclusion, as defined in 4.5, should only be used as a safety measure to protect others from harm when a pupil is experiencing high levels of emotional or behavioural dysregulation. In such circumstances, the pupil is not acting with intent.
- 8.2 Seclusion should not be implemented by staff through threat of punishment.
- 8.3 The place to which the pupil is confined should be safe and not feel threatening or intimidating to the pupil. The pupil should be supervised at all times during the period of seclusion.
- 8.4 As soon as the immediate risk of harm had reduced, the pupil should be allowed to leave.
- 8.5 Any incident involving the use of seclusion must be recorded and reported in accordance with the procedures outlined in Section 12.
- 8.6 Seclusion, as defined in this policy, is not a disciplinary response to deliberate or wilful misbehaviour. It is not the same as 'removal from the classroom', which is outlined in SW4 Student Behaviour and Discipline Policy.

9 Prevention and De-escalation

- 9.1 The Trust aims, through its ethos and values, to create an inclusive environment where all pupils achieve and thrive. Through this, the Trust seeks to establish a preventative approach where there is a minimal need to use restrictive intervention. Whilst each setting has an individual context, the following whole-school approaches will be employed across the Trust:
- training for all staff on the Trust's approach to inclusion, delivered at Induction;
 - the use of a behaviour curriculum by all sites, ensuring that pupils are explicitly taught skills to help them understand and demonstrate positive behaviour;
 - the use of an Inclusion Framework, used by all staff to support pupils;
 - staff training on de-escalation;
 - staff training on unconditional positive regard;
 - ongoing development and maintenance of the sites, to ensure they are welcoming and safe for all pupils;
 - the use of basic expectations, relentless routines and non-negotiables by all staff to support behaviour management, including in communal spaces;
 - the use of early help, to address any concerns or issues before they escalate; and

- the collation, analysis and evaluation of data on restrictive interventions (as recorded through MyConcern) to enable trends to be identified and to inform future planning.
- 9.2 The Trust has an Inclusion for Behaviour Framework, which sets out a tiered approach to supporting pupils. Where a pupil requires intervention beyond the universal offer, an appropriate assessment will be used to identify what the pupil's unmet need(s) are and how they can best be met. In this sense, support can be tailored to the individual and where appropriate will inform an Individual Behaviour Management Plan which can be used by staff to put appropriate provision in place.
- 9.3 All staff have a duty of care towards pupils and must always first try to de-escalate a situation.
- 9.4 The use of reasonable force should always be a last resort. Where it is possible to do so safely before use of reasonable force, a calm warning or instruction to stop should be given and every effort should be made to achieve a satisfactory outcome through de-escalation.
- 9.5 Wherever a holding episode is protracted, regular changeovers of staff should take place. The pupil must continue to be given opportunities to calm down and de-escalation strategies should be attempted. Techniques seek to avoid injury to the pupil, but it is possible that bruising and scratching may occur accidentally, and these are not to be seen necessarily as a failure of professional technique, but a regrettable and infrequent side effect of ensuring that the pupil remains safe. Any adjustments to professional technique used during intervention or restraint will be examined in the recording and reporting phase of the procedures in light of any issues arising out of a crisis episode, and amendments or clarification may be made.

10 Reasonable adjustments

- 10.1 Under the Equality Act 2010, the Trust has a legal duty to ensure that reasonable adjustments are made for disabled children and children with special educational needs (SEND). As part of a positive and proactive approach towards behaviour, settings must think ahead and make reasonable adjustments to avoid discriminating against disabled pupils, and thus reduce (or eradicate) the need for possible restrictive intervention.
- 10.2 The judgement on whether to use reasonable force with children with SEND should not only depend on the circumstances of the case, but also on information and understanding of the needs of the pupil concerned.
- 10.3 Where appropriate, an Individual Behaviour Management Plan will be co-created with the pupil (where possible) and parents, key staff and other

professionals (as appropriate), ensuring that adjustments are clearly identified and will detail circumstances where it might be appropriate for staff to have increased physical contact with the pupil. There will be a key emphasis on aspects of the school environment which the pupil might find challenging, and how they can be supported to communicate their needs effectively.

- 10.4 Where there is an increased likelihood for the need to use restrictive intervention with a pupil with SEND, the setting will have a risk assessment in place.

11 Risk assessments

- 11.1 If it becomes apparent that a pupil is likely to behave in a manner that may require the use of reasonable force, each setting will plan how to respond if the situation arises (using the Individual Behaviour Management Plan), and this will be used to inform a risk assessment.

- 11.2 Such planning will address:

- management of the pupil (e.g., reactive strategies to de-escalate a conflict, holds to be used if necessary);
- involvement of parents/carers to ensure that they are clear about the specific action the academy might need to take;
- briefing of staff to ensure they know exactly what action they should be taking (this may identify a need for training or guidance) and to ensure they can do this as safely as possible; and
- identification of additional support that can be summoned if appropriate.

12 Recording and Reporting

Recording the use of reasonable force

- 12.1 Settings must record each significant incident in which a member of staff uses force on a pupil.
- 12.2 Incidents must be recorded as soon as practicable after the incident. It should be recorded in writing by the member(s) of staff involved and they should endeavour to do this no later than the same day.
- 12.3 The requirement to record applies even if the use of restrictive intervention in certain circumstances is agreed with parents as part of a pupil's Individual Behaviour Management Plan.
- 12.4 Where a significant incident in which a member of staff uses force on a pupil occurs, the member(s) of staff must notify a member of the setting's Senior Leadership Team (SLT) without delay and must then complete a written record.

The Trust has a 'Use of Restrictive Intervention – Recording Form', which must be used to record any significant incident.

- 12.5 A member of SLT who holds appropriate training (see Section 14) will review the paperwork before it is filed.

Reporting the use of reasonable force

- 12.6 Each significant incident in which a member of staff uses force on a pupil must be reported to the parents of the pupil(s) involved as soon as practicable after the incident, and they should endeavour to do this no later than the same day.

- 12.7 Exceptions to the requirement to report are where:

- the pupil is aged 20 or over; or
- it appears to the staff member that doing so would be likely to result in serious harm to the pupil. In this instance, the staff member must report the incident to any parent(s) who it can be reported to without resulting in significant harm or, if there are none, to the Local Authority within whose area the pupil is ordinarily resident.

- 12.8 If staff feel that any of the above exceptions apply, they should discuss this with the setting's Designated Safeguarding Lead (DSL) to ensure appropriate action is taken and documented.

- 12.9 The requirement to report applies even if the use of restrictive intervention in certain circumstances is agreed with parents as part of a pupil's Individual Behaviour Management Plan.

- 12.10 A report of the incident made to parents should include the following details as a minimum:

- time, date, location and approximate duration of the intervention;
- brief account of why the intervention was assessed as necessary in that instance;
- brief account of what type of force was applied, and the degree of force; and
- details of any physical injuries sustained, if applicable.

- 12.11 This information should be communicated to parents in writing. The member of SLT who reviews the recording paperwork will be responsible for communicating the information to parents, but they may delegate this to an appropriate member of staff providing the member of staff has not been involved directly in the incident.

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

- 12.12 Settings must record each seclusion incident. For restraint incidents that occur without direct physical contact, for example, the removal of a walking aid, these must be also be recorded.
- 12.13 Incidents must be recorded as soon as practicable after the incident. It should be recorded in writing by the member(s) of staff involved and they should endeavour to do this no later than the same day.
- 12.14 Where a seclusion or non-force related restraint incident occurs, the member(s) of staff must notify a member of the setting's Senior Leadership Team (SLT) without delay and must then complete a written record. The Trust has a 'Use of Restrictive Intervention – Recording Form', which must be used.
- 12.15 A member of SLT who holds appropriate training (see Section 14) will review the paperwork before it is filed.
- 12.16 A copy of the written record must be provided to parents. Parents must be informed as soon as practicable after the incident, and settings should endeavour to do this no later than the same day. The member of SLT who reviews the recording paperwork will be responsible for communicating the information to parents, but they may delegate this to an appropriate member of staff providing the member of staff has not been involved directly in the incident.
- 12.17 Exceptions to the requirement to report are where:
- the pupil is aged 20 or over; or
 - it appears to the staff member that doing so would be likely to result in serious harm to the pupil. In this instance, the staff member must report the incident to any parent(s) who it can be reported to without resulting in significant harm or, if there are none, to the Local Authority within whose area the pupil is ordinarily resident.
- 12.18 If staff feel that any of the above exceptions apply, they should discuss this with the setting's Designated Safeguarding Lead (DSL) to ensure appropriate action is taken and documented.
- 12.19 The requirement to both record and report applies even if the use of restrictive intervention in certain circumstances and/or seclusion is agreed with parents as part of a pupil's Individual Behaviour Management Plan.

13 After an incident

13.1 The use of restrictive intervention often occurs in response to highly charged emotional situations and there is a clear need for debriefing after the incident, both for the staff involved and the pupil. A member of the Senior Leadership Team will take responsibility for making arrangements for debriefing once the situation has stabilised (it may not be appropriate for the debriefing to take place on the same day). A member of the Senior Leadership Team should always be involved in debriefing the pupil involved and any victims or close witnesses of the incident should be offered support. The pupil involved should be given the opportunity to identify a member of staff to be present during the briefing if they wish. Parents/carers should be informed of the debriefing and given the opportunity to attend, where appropriate. Support will be made available for staff involved in the incident if required.

13.2 The purpose of the debriefing would be to:

- review events leading up to the incident, including any behavioural triggers or warning signs of an impending incident;
- review the process of restrictive intervention and its outcome;
- review whether the Behaviour Management Plan was followed;
- review which de-escalation strategies were used and how effective they were;
- to consider what might be done differently in the future;
- to learn any lessons for future practice to avoid further incidents; and
- to inform reviews of the support in place for the pupil, e.g., the Pastoral Support Plan.

13.3 Where pupils already have an Individual Behaviour Management Plan or a Pastoral Support Plan any intervention should, where possible, follow the plan. After any use of restrictive intervention, the plan should be reviewed to ensure it matches the pupil's needs.

13.4 Where restrictive intervention is used with a pupil who does not have an Individual Behaviour Management Plan, consideration will be given as to whether or not such a plan is needed.

14 Training

14.1 The DfE guidance states that schools need to take their own decisions about staff training based on the school's individual contexts and needs. However, staff who are likely to need to use reasonable force and/or other restrictive interventions should be adequately trained in its safe and lawful use and in preventative strategies.

- 14.2 The Trust does not specify which staff at each setting should undergo training, but requires that, as a minimum, at least one member of the Senior Leadership Team completes Team Teach training to ensure they can appropriately review the reporting and recording of restrictive intervention.
- 14.3 The Trust recognises that staff may not wish to undertake training in restrictive intervention. Anyone undergoing training must recognise that, in some circumstances, restrictive intervention may lead to situations that may result in personal injury to themselves.

15 Complaints

- 15.1 In the event that parents/carers express a concern over an incident of positive handling, they have a right to be informed of SW9 Parental Communications and Complaints Policy. They must be informed of this right and be signposted to the policy, which is freely available on the Trust website, or provided with a hard copy on request.
- 15.2 If a pupil makes a complaint when force is used on them, the Headteacher must be informed.
- 15.3 All complaints will be thoroughly, speedily and appropriately investigated.
- 15.4 Where a member of staff has acted within the law – that is, they have used reasonable force in order to prevent injury, damage to property or disorder – this will provide a defence to any criminal prosecution or other civil or public law action.
- 15.5 When a complaint is made, the onus is on the person making the complaint to prove their allegations are true – it is not for the member of staff to show that they have acted reasonably.
- 15.6 Where necessary, any allegations will be dealt with in line with HR24 Allegations of Abuse Made Against Adults Policy and HR12 Staff Disciplinary Policy.

16 Safe Touch

- 16.1 It is not illegal to touch a pupil. There are circumstances where it is appropriate for staff to have some physical contact with pupils which does not give rise to any question over the use of restrictive intervention (including the use of reasonable force). For the purpose of this policy, the Trust will refer to this type of physical contact as 'safe touch'.
- 16.2 The Trust's policy rests on the belief that every staff member needs to appreciate and understand the difference between appropriate and inappropriate touch. Staff members need to be highly aware of the possible

damaging effect of the inappropriate and unnecessary use of touch in an educational context. Touch is not to be used as ill thought-out or as an impulsive act.

16.3 Appropriate safe touch is important and examples of occasions when physical contact is generally appropriate include (taking into consideration the child's age, developmental age and whether other strategies that do not include physical contact can be used):

- to provide first aid;
- to guide or escort pupils, such as holding the hand of a pupil at the front/back of the line when going to assembly, when walking together around the school or on an educational visit, or when helping a pupil to a space they have chosen to access to self-regulate;
- to comfort a distressed pupil;
- to congratulate or praise a pupil, for example a pat on the back or a handshake;
- educational tasks – touch can also be used to direct children in educational tasks and developing skills, for example, to demonstrate how to use a musical instrument or to demonstrate exercises or techniques during PE lessons or sports coaching. Physical prompting and support, gestural and physical prompts during learning activities such as hand-over-hand support and hand-under-hand support. Play activities naturally include touch. People of any age who are at early levels of development are likely to be quite tactile and physical.
- mobility – physical support may be used as guidance and/or to help with mobility or as part of an activity where a pupil needs support when moving. Please note that this is different to 'moving and handling'. For further information on this, please see HR44 Moving and Handling (Students) Policy.
- intimate care – please see SW1 Intimate Care Policy.
- medical care – please see HS2 Medical Treatment Policy.

16.4 If touch is used, the young person's consent should be sought (where this is possible). Staff must be aware that some pupils are sensitive to touch and/or may have a history of receiving negative touch. It should also be done openly, where other adults are present or practice is observable.

16.5 When touch is used as part of a planned intervention to support a pupil, it must be done as part of an agreed support plan, the formation of which should involve the pupil (where possible), staff, parents/carers and any other professional(s) if necessary, e.g., occupational therapist. The exception to this is in specialist settings, whereby massage is an integral part of the sensory and communication curriculum delivered by specialist staff, for example, through TACPAC or Story Massage.

- 16.6 In the event that staff have any issues concerning appropriate touch, or they observe any practice that causes concern they must discuss it with the Headteacher/Head of Setting without delay.
- 16.7 Where unplanned safe touch has been used to emotionally regulate a child, staff should discuss this with their Line Manager, and parents/carers must be informed. This should be documented in the child's record, to enable the setting to establish any patterns of behaviour.
- 16.8 At no point, and under no circumstances, should staff members use touch to satisfy their own need for physical contact or reassurance. Any member of staff who abuses this policy or their position, may be subject to disciplinary action, in line with HR12 Staff Disciplinary Policy.

Use of touch to provide emotional support

16.9 Hugging

A hug slows the heart rate and encourages the production of happy hormones which in turn lowers stress and anxiety. Due to the developmental levels of some pupils, they are still at a stage where physical contact is sought. Staff who use touch to provide this emotional support should preferably use a sideways on hug, with the adult putting their hands on the child's shoulders. The adult's hands on the shoulders limits the ability of the child to turn themselves into staff. This can be done either standing or sitting. When working with pupils who do not understand personal space, it can be difficult to maintain a sideways hug, but a front-facing hug should not be initiated by staff.

- 16.10 If a hug is given or received, staff should ensure that there are other members of staff around. If an additional adult is not present/the interaction is not overlooked, the member of staff should inform a member of SLT. This is important in order to record and monitor the times the child is doing this, and to ensure staff safety.

16.11 Lap-sitting

Lap-sitting is not encouraged. However, pupils in the early years may want to sit on an adult's knee as developmentally this is a way of seeking emotional security and the next step as trust is formed away from their home caregiver. Where this happens, staff should be in an environment where they can be overlooked, and not one-on-one with a child. If an older child (KS1+) attempts to sit on a member of staff's lap, it is important for staff to encourage them to sit next to them.

- 16.12 If a child tries to sit inappropriately – staff should openly and explicitly explain to them how to manage such situations. For example, a member of staff could say "I don't feel comfortable, let's sit you this way, that's it – this is how we can

sit and chat”, or “This may hurt my knees, sit beside me please”. This creates a safe situation for everyone.

17 Policy change

- 17.1 This policy may only be amended or withdrawn by the Priory Federation of Academies Trust.



The Priory Federation of Academies Trust Positive Handling and Safe Touch Policy

This Policy has been approved by the Pay, Performance and HR committee:

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human Resources.