



Behaviour Policy – Adult Education

Policy Folder: Adult Education

BEHAVIOUR POLICY – ADULT EDUCATION

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Other Agencies:

For the purposes of this policy, '*other agencies*' refers to any relevant professionals involved in supporting the individual. This may include, but is not limited to, advocates, Local Authority representatives, social workers, and relevant health or clinical professionals. Where appropriate, the setting will work collaboratively with the individual and identified other agencies to ensure support is planned, delivered and reviewed in line with the individual's needs and best interests

1.0 INTRODUCTION

We place the safety and well-being of the individuals we educate and support as our highest priority. We are committed to meeting their needs and aim to create a culture where individuals flourish and engage positively in their education and development. Our approach is informed by our clinical well-being strategies which are based on the most current and up to date research.

Our schools and colleges have different identities and approaches, which are unique to them and reflect the needs of their individuals. The aim of this policy is to promote positive behaviour through a supportive and consistent approach that is based on an understanding of our individuals' needs.

Care First is a specialist further education provision for young people aged 16–25 with a range of special educational needs and disabilities (SEND), including autism, learning difficulties, social, emotional and mental health (SEMH) needs and associated complex needs. Learners have Education, Health and Care Plans (EHCPs) and access highly personalised programmes designed to support their individual needs, aspirations and Preparation for Adulthood outcomes.

The college has a neurodiversity affirming, trauma-informed, needs-led approach that encourages positive behaviour by proactively recognising and flexibly supporting our individuals' holistic individual needs. Team members are trained to apply this approach in practice at all times and support our individuals consistently and fairly, developing positive, respectful relationships with them.

For individuals aged 16–17, this policy operates within the safeguarding framework for children. For individuals aged 18 and over, this policy operates within adult safeguarding legislation and the principles of autonomy, proportionality and least restrictive practice. Where relevant, the Mental Capacity Act (2005) will apply to decision-making relating to behaviour support and any restrictive intervention.

2.0 LEGAL FRAMEWORK AND GUIDANCE

This policy complies with all relevant regulations and other legislation as detailed below.

Legislation and Guidance Applying to All Individuals (16–25)

- Equality Act 2010
- Oliver McGowan Code of Practice
- Care Act 2014 (Safeguarding Adults)
- Mental Capacity Act 2005 (including the five statutory principles)
- Human Rights Act 1998
- Health and Safety at Work Act 1974
- The Education (Independent School Standards) Regulations 2014
- The Independent School Standards (Guidance for independent schools – updated April 2019)

Additional Legislation and Guidance for Individuals Under 18 (16–17)

- Education Act (2011)
- Children and Families Act 2014
- Positive environments where children can flourish, Ofsted Guidance (2021)
- Behaviour and Discipline in Schools DFE Guidance (2016)
- Behaviour in Schools: A guide for Head Teachers and School Staff (2024)
- Use of Reasonable Force – advice for school leaders, staff and governing bodies
- Keeping Children Safe in Education (KCSIE) 2025

Commented [HH1]: Also need to include the Mental Capacity Act 2005, you might need to also include the Care Act 2014 and the Oliver McGowan Code of Practice

- Searching, Screening and Confiscation (July 2022)

The Behaviour and Discipline in Schools (2016) guidance states that 'schools need to ensure they have a strong behaviour policy to support team members in managing behaviour, including the use of rewards and sanctions'. Behaviour policies are typically informed by Behaviourist approaches; however, we are aware that punitive approaches to behaviour management in educational settings can be damaging to individuals' mental health. This is especially true for individuals within Acorn and Options provisions who may have lived experience of trauma and complex needs.

Behaviour in Schools: A guide for Head Teachers and School Staff (2024) is clear that good behaviour in educational settings is central to a good education, with settings providing a calm, safe and supportive environment which individuals want to attend and where they can learn, develop and thrive.

For individuals aged 18 and over, any response to behaviour must also be lawful, proportionate, necessary and the least restrictive option available, in accordance with the Human Rights Act 1998 and the Mental Capacity Act 2005 where applicable.

3.0 POLICY FRAMEWORK

The Group is committed to reducing the use of restraint and restrictive practices and supporting preventative practices across all services and is part of the Reducing Restraint Network. The Group's Restraint Reduction Practices Board has developed a policy supplement, The Use of Restrictive Practices and Restraint Terms of Reference, which must be implemented as part of this policy.

Our schools and colleges are underpinned by our needs-led and (Acorn Schools – Trauma Informed Practice Strategy, drawing upon evidence-based core principles of Connect, Co-Regulate, Co-Reflect) (Options settings – Neurodiversity Strategy drawing upon evidence-based principles of Ask, Accept, Develop. Both the Strategy and Accreditation have been shared with our Lived Experience Expert Group and Advisory Board).

This policy should be read alongside the above strategies, guidance and other relevant school, college and Group policies and guidance, including:

- Safeguarding Policy
- Safeguarding Adults Policy
- Anti-bullying Policy
- Child-on-Child Abuse/Peer-on-Peer Abuse Policy (for individuals under 18)
- Suspension and Permanent Exclusions Policy
- Self-Harm/Self-Injurious Behaviour Policies
- Medication Policy
- Code of Conduct and Ethics Policy
- Managing Allegations Against Employees Policy
- Complaints Policy
- Trauma Informed Practice Strategy (Connect, Co-Regulate and Co-Reflect)
- Ask, Accept, Develop
- Parent/Carer – Setting Communication Policy (for individuals under 18 and adults where appropriate)
- Serious Incident Notification Policy

For individuals aged 18 and over, this policy must also be read in conjunction with the Mental Capacity & Consent Policy and any Positive Behaviour Support (PBS) or risk management plans in place.

4.0 PURPOSE OF THIS POLICY

This policy aims to promote a move towards an evidence and person-centred, inclusive approach where our individuals are supported to experience a sense of belonging.

The policy, practice and procedures aim to reflect and demonstrate the importance of the school's/college's commitment to promoting the entitlement of individuals to the highest quality of education and preparation for adulthood. This policy aims to promote an evidence-based and inclusive approach where individuals are supported to learn effective ways of managing their emotions and behaviour to prepare for their future, independence and wider community participation.

For individuals aged 18 and over, this includes recognising and promoting autonomy, dignity and lawful decision-making in line with the Mental Capacity Act 2005 where applicable.

4.1 POLICY IMPLEMENTATION

Everyone is expected and supported to treat one another with dignity, kindness and respect. We use an 'inclusion by design' model, meaning we create school and college environments which are predictable, accessible and psychologically safe.

This policy can be implemented alongside Individual Plans, which may identify a specific approach tailored to an individual's strengths and needs, including Positive Behaviour Support (PBS) plans or risk management plans where appropriate.

When incidents of behavioural distress and emotional dysregulation occur, we respond promptly, predictably and with confidence to maintain a calm, safe learning environment. We consider and reflect together how the likelihood of such incidents recurring can be reduced. De-briefing occurs at the end of each day to consider everyone's actions and responses and how to improve practice.

For individuals aged 18 and over, responses to behaviour will be lawful, proportionate and the least restrictive option available, taking into account the individual's rights, wishes and, where relevant, their capacity to make decisions about their behaviour and support.

5.0 OUR PHILOSOPHY

Individuals are all unique and we celebrate this.

- We have an inclusive by design approach.
- We value developing strong and respectful relationships within the whole school/college community. This includes individuals, between team members, with parents/carers (where appropriate), and the wider community, such as health and social care professionals.
- We maintain clear boundaries and expectations to create safe and predictable environments.
- We regularly consult individuals to ensure their voices are heard and that they are involved in decisions about their support, in line with their age and capacity.
- We recognise individuals can be distressed and can experience meltdowns or shutdowns. We also recognise that some behaviours are part of normal developmental stages for younger individuals, including testing boundaries when developing independence. For adults, behaviour may reflect unmet needs, trauma, communication differences, neurodivergence or distress.
- We recognise that as a whole school/college community we impact one another. Regular reflective practice enables us to understand, make sense of and support this impact positively.
- Our philosophy is never based on punishment but focused on solutions. Our individuals are managing the best way that they know how, with the skills they currently have.
- There are times when individuals may become so distressed that additional measures may be required to keep them and others safe. Our team members are trained to respond appropriately and must always

use the least restrictive intervention possible, in accordance with safeguarding and legal frameworks.

- Our team members are role models in helping our individuals learn more skillful ways to experience success and create inclusive communities.

6.0 MAINTAINING HIGH STANDARDS OF WELL BEING TO SUPPORT POSITIVE BEHAVIOUR

Senior Leaders take responsibility for implementing measures to ensure our approach to supporting needs and behaviour meets the following national minimum expectation:

- We have high expectations of individuals. Our expectations relating to behaviour are always understood according to their individual strengths and needs. We help individuals understand that their needs are unique and that responses are tailored accordingly.
- School/college leaders visibly and consistently support all team members in supporting individuals' needs and behaviour through following this policy.
- Universal and personalised measures are in place to support our individuals to be the best versions of themselves.
- All members of the school/college community create a positive safe environment in which bullying behaviour, physical threats or abuse and intimidation are not tolerated, in which individuals are safe and feel safe and everyone is treated respectfully.
- Any incidents of bullying behaviour, sexual violence and harassment, discrimination, aggression, and derogatory language (including name calling) are dealt with quickly and effectively, in accordance with safeguarding procedures for both children (under 18) and adults at risk (18+).

6.1 KEY ROLES

The Role of School/College Leaders

Our college leadership team is highly visible, with leaders routinely engaging with individuals, parents/carers/other agencies (where appropriate) and team members on setting and maintaining the college culture and an environment where everyone feels safe and supported.

Leaders ensure that all new team members are inducted into the setting's culture to ensure they understand its rules and routines and how best to support individuals to participate in creating the culture of the setting.

All new team members receive bespoke training as part of their induction into understanding the needs of the individuals through the Group's Trauma Informed Practice modules and Neurodiversity training modules as appropriate, and CPI (Crisis Prevention Institute) De-escalation and Behaviour Management Training. Ongoing training and support are also provided via the professional development arrangements and the Group's Well-being and Clinical Team.

Leaders ensure that for individuals aged 18 and over, behaviour support arrangements are lawful, proportionate and consistent with the Mental Capacity Act 2005 and Care Act 2014 where applicable.

The Role of Team Members

All team members have a responsibility to provide a safe environment in which individuals can learn and develop, including regulation of their own emotions and behaviour, encouraging respect for others, and preventing all forms of bullying behaviour (including cyberbullying, prejudice-based and discriminatory bullying) and being alert to any signs of child-on-child abuse (for individuals under 18) or peer-on-peer abuse and safeguarding concerns (for adults at risk).

Team members have an important role in developing a calm and safe environment and establishing clear expectations and boundaries. Team members uphold the whole-setting approach to behaviour by teaching and

modelling expected behaviour and positive relationships so that individuals can see examples of positive habits and are confident to ask for help when needed.

Team members communicate the college expectations, routines, values and standards both explicitly through teaching skills, visual supports and in every interaction with individuals. Team members also receive clear guidance about expectations of their own conduct, which are set out in the Group's Code of Conduct and Ethics Policy.

Where behaviour support involves decision-making for individuals aged 18 and over who may lack capacity, team members must act in accordance with the Mental Capacity Act 2005 and follow best interest decision-making processes where required.

The Role of the Individual

All individuals deserve to learn in an environment that is calm, safe, supportive and where they are treated with dignity. To achieve this, every individual is made aware, in line with their age and capacity, of the college standards, expectations, pastoral support, and therapeutic consequence processes.

Individuals are supported to understand that they have a responsibility to contribute to the college culture and are asked about their experience of the college and provide feedback in ways that are accessible and meaningful to them. This helps support the evaluation, improvement and implementation of this policy.

Every individual is supported to achieve the best standards they can, including an induction and transition process that familiarises them with the college culture.

For individuals aged 18 and over, this includes supporting autonomy, participation in decision-making and understanding rights and responsibilities within the setting.

The Role of Parents/Carers and Other Agencies

The role of parents/carers and other relevant agencies is crucial in helping the college to develop and maintain our culture and approach, particularly for individuals under 18 and for adults where appropriate and lawful. Including parents, carers and other relevant agencies within the whole college community is key to ensuring comprehensive support around the individual.

Parents/carers are encouraged to get to know our Behaviour Policy and related policies and, where possible, take part in the life of the college and its culture. Parents/carers should be encouraged to reinforce the policy at home as appropriate. Where a parent/carer has any concerns, they should raise this directly with the college while continuing to work in partnership with them.

We build and maintain positive relationships with parents/carers by keeping them updated about the individual, encouraging them to celebrate successes, or holding sessions for parents/carers to help them support the consistency of the policy and the individual's needs. Where appropriate and with consent, parents/carers may be included in pastoral work, including attending reviews of specific interventions in place.

For individuals aged 18 and over who have capacity, sharing information with parents/carers will be subject to the individual's consent, unless safeguarding duties apply.

Clinical Approaches

The overarching clinical approach throughout the Group is embedded by delivering care, education and clinical provisions that meet an individual's needs, informed by current wellbeing research theory and evidence.

The Clinical team is multi-disciplined, and includes psychology/psychotherapy, speech and language therapy and occupational therapy. The Team provides training, consultation, individual therapy, group sessions and facilitates reflective practice for team members.

Focus on Relationships

Positive and meaningful relationships throughout the whole school/college community are essential to fostering a healthy environment for all. Empathy, trust and consistency are all important in building relationships.

For various reasons, individuals may test and challenge relationships; therefore, team members require the ability to sensitively and confidently manage professional relationships. There is an expectation that we are kind to one another and help to lead and drive high standards of culture and positive behaviour across the Group to benefit individuals.

Individual Needs

We celebrate difference and make reasonable adjustments to enable individuals to access learning and engage to the best of their ability. This approach is informed by formal assessments (e.g. Educational/Clinical Psychologist), EHCPs (where applicable), Clinical Documents and Plans and getting to know our individuals – their likes, dislikes, and how to help them reach their potential.

As far as possible, we use a proactive approach to anticipate potential stressors that might lead to behaviour.

7.0 CREATING AN INCLUSIVE COMMUNITY

- Clear expectations and consistent boundaries: We clearly communicate our expectations through speech, visuals, modelling and accessible formats so all team members and individuals (in line with their age, stage and capacity) are aware of expectations and boundaries appropriate to their strengths, needs and rights. Expectations are applied consistently and flexibly, recognising neurodivergent communication styles, processing differences and regulation needs.
- The Curriculum: Our behaviour curriculum is part of our Personal, Social, Health and Citizenship / Relationships and Sex Education and Preparation for Adulthood curriculums. For individuals aged 18 and over, this includes learning related to independence, community participation, employment readiness, emotional literacy and understanding rights and responsibilities.
- Routines: Routines and structure are integral to the school/college day. Team members ensure that individuals receive a timetable for their learning and daily activities that is appropriate to their age, stage and preferences, providing predictability and reducing anxiety. Flexibility is embedded to ensure reasonable adjustments can be made where needed.
- Environment: We create calm, welcoming and clean spaces, taking into account sensory processing differences and the environmental needs of our population. We recognise that lighting, noise, layout, transitions and social demands can significantly impact regulation and participation, particularly for neurodivergent individuals.
- Communication: We use a total communication approach which aligns with the communication strengths and needs of our population.
- Emotional Understanding and Regulation: Many of our individuals may experience intense emotional responses, sensory overload, shutdown, burnout or difficulties processing and expressing emotions. We support individuals to develop skills to understand and manage their emotions and behaviour through shared models and frameworks (such as LevelUp! Or Sensory Ladders) adapted appropriately to age and developmental stage. This supports a shared language approach within the whole- college community.

What we do not support - this list is inclusive of, but not exhaustive – the Group does not support talking about individuals front of them or others, shouting at one another, swearing, and disrespectful language.

8.0 USE OF REWARDS AND RECOGNITION

- Recognition – We recognise and celebrate effort, progress and personal growth, not just achievement. Examples of recognition and positive reinforcement include verbal praise, written feedback, celebration assemblies, certificates, opportunities for preferred activities, enrichment opportunities or agreed experiences. Achievements may be shared with the wider community, such as parents/carers, where appropriate and with the individual's consent (particularly for those aged 18 and over).
- Rewards are never removed once they have been earned for the intention of providing a sanction. Recognition systems are designed to be affirming and supportive rather than transactional. The use of food as a reward or behavioural incentive is not permitted within the setting
- Rankings – Reward systems will not be placed on public display in ways that compare individuals, as we recognise this could be shaming, demotivating or dysregulating for some individuals. We avoid public comparison models and instead focus on personal progress and individualised success.
- Unfair incentives – We have eliminated unfair college incentives, such as attendance awards, as we recognise that neurodivergent individuals and those with complex needs may experience periods of ill health, anxiety, sensory overload or burnout which impact attendance. Individuals will not be penalised or publicly disadvantaged for needs-related absence.
- Use of monetary rewards – Money will not be used as an incentive for behaviour. Where financial literacy or budgeting forms part of the curriculum, this will be delivered as an educational activity rather than a behaviour management strategy.

9.0 PRESCRIBED MEDICATION Team members must be familiar with the Medication Policy

Individuals within our settings may take prescribed medication. We will work in collaboration with the prescribing professional and those supporting the individual to ensure their needs are well supported, in line with our legal responsibilities and the setting's Medication Policy. We will support and monitor the impact of this medication in partnership with the individual and relevant professionals.

Attendance at college is not dependent on an individual taking their prescribed medication. We will support individuals in understanding their medication and informed consent in relation to it. For individuals aged 18 and over, decisions regarding medication will be made in accordance with the Mental Capacity Act 2005 where applicable. Where an individual lacks capacity to make decisions about their medication, best interest processes will be followed in line with legal requirements.

10.0 RESPONDING TO DISTRESS AND NEED

There are times when individuals become distressed and may require additional sources of support. When a team member becomes aware of distress, they respond empathetically, predictably, promptly and clearly in line with this policy.

The first priority will be to establish the physical and emotional safety of individuals and team members and to restore a calm environment. Keeping individuals safe is always the highest priority for all team members. We will also consider whether the behaviour gives cause to suspect that an individual is suffering, or is likely to suffer, harm. Team members must be familiar with, and follow, the setting's Safeguarding Policy where applicable.

All concerns, no matter how small, that an individual is being harmed or is at risk of harm must be reported to the setting's Designated Safeguarding Lead (DSL) or Deputy. For individuals aged 18 and over, safeguarding concerns will be managed in line with the Care Act 2014 and local adult safeguarding procedures.

The college has responsibility to respond to individuals' behaviour outside of the setting's premises (including

online) to such an extent as is reasonable and proportionate.

The college adopts a range of initial intervention strategies to support emotional regulation and behaviour.

11.0 NATURAL AND LOGICAL CONSEQUENCES

Positive reinforcement combined with natural and logical consequences are important and necessary to support our whole school/college culture.

Everyone we support benefits from clear, consistent boundaries and expectations that are fair, predictable and easy to understand. Individuals are encouraged to take an active role in developing these boundaries, so they feel respected, included and supported in a way that meets their needs.

Natural consequences occur without the intervention of team members. For example, an individual might throw a favoured object when they are feeling angry which might then break and therefore cannot be used.

Individuals may experience uncomfortable emotions following an incident, such as shame, disappointment or frustration. Team members provide support to help individuals process these feelings safely and constructively. We do not use shame as a behaviour management strategy and do not intentionally create situations designed to make an individual feel embarrassed or humiliated.

Logical consequences are team member-led and are directly linked to the event, particularly where a natural consequence may not occur or may present a safety risk. For example, if an individual removes their seatbelt during a car journey, a logical consequence to ensure safety may be to pause or avoid car journeys whilst a plan to support safe seatbelt use is developed and implemented.

Natural and logical consequences will be communicated to the individual in an empathetic, respectful and collaborative way, never in a shaming or punitive manner.

We do not use punitive sanctions, for example isolation, detention or removal of earned privileges. These approaches can undermine dignity, damage relationships and do not effectively support individuals to learn alternative strategies. Any consequence must be clearly linked to the behaviour and designed to provide a meaningful learning opportunity.

Repairing relationships (a restorative approach) is a key part of natural and logical consequences. It is the team member's responsibility to facilitate and support this repair where needed, particularly if it feels difficult or overwhelming for the individual.

12.0 DE-ESCALATION

De-escalation techniques are our primary responsive strategies. These include:

- our team members will use a calm approach with neutral, non-threatening body language
- our team members will use minimal, clear verbal interactions during de-escalation, allowing processing time and avoiding overload
- we will use positively framed, calm and respectful language (for example, "Pause with me" or "Let's create some space" rather than reactive or confrontational language such as "stop hitting/kicking" etc)
- we will use planned and proactive positive distraction (for example, talking about the individual's interests or preferred topics; for non-speaking individuals this may include presenting a preferred object, visual cue, sensory item, or access to an AAC device to support expression)
- we will divert the individual to a different, preferred activity or experience where appropriate
- we will adapt or change the environment (for example, supporting access to a calm room, low-arousal space, outdoor area or reduced sensory environment)
- we will encourage the individual to engage in a preferred sensory activity or regulation strategy to support co-regulation and self-regulation
- changes to the team member supporting the individual, where relationships or dynamics may be

contributing to escalation

- use of space and supporting the individual to move freely and safely, including structured movement breaks, time outdoors, or access to a designated low-arousal or regulation space

We do not use:

- planned ignoring
- asking an individual “why” they are behaving in a certain way during escalation
- any shame-based approaches
- any language which could be interpreted as threatening (e.g. “last chance”)

13.0 THE USE OF RESTRICTIVE PHYSICAL INTERVENTION

We recognise that restraint of any kind can have a negative psychological impact and may affect trust and relationships between individuals and those who support them. We work closely to integrate the Ask, Accept, Develop (AAD), Trauma Informed Practice (TIP) and Reducing Restraint Network (RRN) Strategies across all services.

Restrictive physical intervention is only ever used as a last resort response to maximise safety and minimise harm to the individual or others.

A reasonable, proportionate and least restrictive course of action will be taken where there is an imminent or immediate risk of harm to self or others.

Restrictive physical intervention will always be used for the shortest time possible and only when there is no safer alternative to maintain safety. Team members are fully trained using CPI and work in line with the Group's Use of Restrictive Practices and Restraint Terms of Reference.

For individuals aged 18 and over, any restrictive intervention must also be lawful and compliant with the Mental Capacity Act 2005 where applicable. Interventions must

not amount to a deprivation of liberty unless authorised in accordance with legal frameworks.

Individuals cannot consent to the use of restrictive physical intervention itself. However, where appropriate, emergency management plans may be developed which outline agreed proactive and reactive strategies, including the use of restrictive physical intervention where this is necessary, proportionate and in the individual's best interests to prevent harm.

14.0 SEARCHING, SCREENING AND CONFISCATION

For individuals under 18, team members may confiscate, retain or dispose of property in line with the DfE's Searching, Screening and Confiscation Guidance. Team members will ensure that any action taken is reasonable, proportionate and considers any special circumstances relevant to the case.

For individuals aged 18 and over, any search or confiscation of property must be lawful, proportionate and justified on the basis of safety or safeguarding risk. Where possible, consent will be sought prior to any search. Property will only be removed where there is a clear risk of harm, illegality, or serious disruption to the safety of the setting.

Items which contribute to an individual's wellbeing, neurodivergent needs and sense of safety (for example regulation tools, sensory items or assistive devices) will not be removed unless there is a significant and immediate risk of harm.

All actions relating to searching or confiscation will be recorded in accordance with safeguarding and behaviour procedures.

15.0 REMOVAL FROM LEARNING SPACES

Removal from a learning space is only ever considered when the safety and wellbeing of the individual, others and team members are at risk. We will also consider the potential disruption to others' learning opportunities in the immediate area. The individual will continue to be supervised at a level appropriate to their emotional, developmental and intellectual needs. At other times, we may choose to relocate other individuals in order to ensure safety and minimise disruption to learning.

The Headteacher, Principal or equivalent maintains strategic oversight of any removals, ensuring that the reasons that may lead to individuals being removed are transparent and known to all team members and individuals; that removal is for the shortest time possible; that it takes place in an appropriate space that allows the individual to regulate and refocus; that it is supervised by trained team members; and that there is a clear process for supporting reintegration into the learning environment as soon as it is appropriate and safe to do so.

Individuals will not be removed from learning spaces for prolonged periods of time without the explicit agreement of the Headteacher, Principal or equivalent. Team members will reflect on and review the action that was taken in order to make practice improvements where possible.

16.0 SUSPENSION AND PERMANENT EXCLUSIONS

All individuals are entitled to an education where they are protected from disruption and can learn in a calm, safe and supportive environment. Headteachers, Principals or equivalent may use suspension and permanent exclusion in response to serious incidents and to enable time to make the environment safe and ready again before the individual returns.

Suspension or permanent exclusion will always be considered a last resort. Removing an individual from the school/college environment, particularly where trusted relationships are established, is rarely likely to be in their best interests. We recognise the potential impact this may have on the individual and, where appropriate, their parents/carers, and will work to provide appropriate support throughout the process.

For individuals aged 18 and over, decisions relating to suspension or exclusion will be lawful, proportionate and in line with contractual and regulatory obligations. Please refer to the Suspension and Permanent Exclusion Policy for more information.

17.0 DE-BRIEFING

It is good practice to provide a space for individuals to de-brief following a significant incident and to support relationship repair. This will take place at an appropriate and timely point, when all parties are regulated and ready.

We may use visual, written, narrative or alternative communication techniques to support understanding and promote learning during a de-brief. It is recognised that some neurodivergent individuals may struggle to reflect immediately following distress, and may not recall events clearly due to high levels of dysregulation. De-briefing will therefore always occur in the individual's best interests and in a way that is supportive rather than interrogative.

There are trauma-informed and neurodivergent-affirming de-brief documents in place that align with the Reducing Restraint Network pledge.

17.1 COLLEAGUE WELLBEING

It is recognised that supporting individuals with complex needs can be demanding for team members, and we aim to create a positive and trauma-informed whole-setting culture. Our strategies support team members to be aware of and manage their own wellbeing.

Schools and colleges provide support to colleagues following an incident and/or challenging day in a non-judgemental, empathetic and psychologically safe space. Post-incident de-briefs are mandatory.

Teams are also supported through regular reflective practice groups to enable them to process the emotional impact of their work and maintain high-quality, compassionate practice.

18.0 RECORDING AND REPORTING

The college has a strong and effective system for data capture, including all components of the behaviour culture (e.g. Sleuth). This is monitored through trends and patterns which are objectively analysed regularly by designated team members, within a structured monitoring and evaluation cycle, with engagement from school/college leaders and governors.

This enables us to support a whole college approach to reducing behaviour incidents and restrictive practice. This includes behaviour incident data, attendance, permanent exclusion and suspension data, incidents of searching, screening and confiscation, and surveys for team members, individuals, governors, proprietors and other stakeholders on their perceptions and experiences of the setting's behaviour culture.

College leaders and team members analyse and audit data with an objective lens and from multiple perspectives: at college level, group level and individual team member and individual level. College leaders pose questions to drill down further to identify possible contributing factors to behaviour, system issues, environmental stressors or failure to provide appropriate support.

Data is analysed by protected characteristic and used to inform policy and practice, ensuring that the setting meets its duties under the Equality Act 2010 and promotes fairness, inclusion and non-discrimination across all age groups.

For individuals aged 18 and over, data relating to behaviour and safeguarding will also be reviewed in line with adult safeguarding responsibilities under the Care Act 2014, where applicable.

Reporting to Outside Agencies

Behaviours presented by individuals that are dangerous, pose a significant safeguarding risk, or may constitute a criminal offence may require reporting to appropriate external agencies, such as the police.

Where concerns are raised about the conduct of a team member, a referral to an external agency may be required, including the Local Authority Designated Officer (LADO) (for individuals under 18), Adult Safeguarding services (for individuals aged 18 and over), regulatory bodies, or the police, as appropriate.

Team members must follow the processes set out in the Safeguarding Policy, Safeguarding Adults Policy and the Managing Allegations Against an Employee Policy. All decisions to report externally will be made in line with safeguarding legislation, proportionality principles and the setting's duty of care.

19.0 ANTI-BULLYING BEHAVIOUR

Individuals may experience difficulties in navigating social relationships, communication differences or past experiences that impact how they relate to others. Some individuals may not have previously experienced positive role modelling in relationships.

Team members will remain vigilant to signs of bullying behaviour, whether overt or subtle, in person or online. All incidents will be addressed promptly and in accordance with the Anti-Bullying Behaviour Policy.

For individuals aged 18 and over, concerns may also be considered within adult safeguarding procedures where bullying behaviour constitutes abuse or exploitation under the Care Act 2014.

20.0 CHILD-ON-CHILD ABUSE/PEER-ON-PEER ABUSE AND SEXUAL HARASSMENT

For individuals under 18, please refer to the Child-on-Child Abuse Policy.

For individuals aged 18 and over, concerns relating to peer-on-peer abuse, sexual harassment or sexual violence will be managed under safeguarding adults' procedures in line with the Safeguarding Adults Policy and Care Act 2014.

Following any report or concern raised regarding peer abuse, sexual harassment or sexual violence (offline or online), the school/college will follow the appropriate safeguarding policy and notify the Designated Safeguarding Lead (DSL) or Deputy immediately. The Clinical Lead will also be informed.

The college is clear that sexual violence and sexual harassment are never acceptable and will not be tolerated. Incidents where behaviour falls below expected standards will be addressed promptly and proportionately. All team members understand the importance of challenging inappropriate language and behaviour between individuals. The school/college will never normalise sexually abusive language or behaviour by treating it as 'banter', an inevitable fact of life, or an expected part of growing up.

We advocate strongly for high standards of conduct between individuals and team members. Interactions should demonstrate respect, courtesy, appropriate boundaries and dignity at all times.

It is essential that all victims are reassured they will be supported, kept safe and taken seriously, regardless of how long it has taken them to come forward. Abuse that occurs online or outside of the school/college will not be downplayed and will be treated with equal seriousness. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report or have their experience minimised.

21.0 ONLINE INCIDENTS

Please also see the Staying Safe Online Policy

The way in which individuals relate to one another online can have a significant impact on the culture within the school or college. Negative online interactions can damage the setting's culture and may contribute to individuals feeling unsafe. Behaviour issues online can be complex to manage due to factors such as anonymity, the speed of information sharing and the fact that incidents may occur both on and off the premises.

The college is clear that although online spaces differ in many ways, the same standards of behaviour apply online as offline. Everyone is expected to treat others with kindness, respect and dignity.

Inappropriate online behaviour, including bullying, the use of inappropriate or discriminatory language, the soliciting or sharing of nude or semi-nude images or videos, and sexual harassment, will be addressed in accordance with the same principles as offline behaviour. Where an incident raises a safeguarding concern, the reporting process set out in the Safeguarding Policy and/or Safeguarding Adults Policy must be followed. The Designated Safeguarding Lead or Deputy must be informed immediately.

We will address online behaviour that poses a threat or causes harm to another individual and/or could have repercussions for the safety, wellbeing or reputation of the school or college.
Please also see the Mobile & Smart Technology Policy.

22.0 SUSPECTED CRIMINAL BEHAVIOUR

Where a team member, Headteacher, Principal or equivalent suspects criminal behaviour, the school/college will make an initial assessment to determine whether the incident should be reported to the police. This will involve gathering sufficient information to establish the known facts. Initial assessments will be documented carefully, and reasonable steps will be taken to preserve relevant evidence.

Once a decision has been made to report the matter to the police, the school/college will ensure that any further internal action does not interfere with police processes. However, the college retains discretion to continue its own investigations and implement appropriate consequences, provided these do not conflict with police action.

When making a report to the police, it may also be appropriate to notify the Local Authority (for individuals under 18) or Adult Safeguarding services (for individuals aged 18 and over), depending on the nature of the concern.

The setting's Safeguarding Policy and/or Safeguarding Adults Policy must be followed, and the Designated Safeguarding Lead (or Deputy) must be informed immediately.

23.0 COMPLAINTS

Any complaint or concern raised by an individual will be taken seriously. Team members will remain attentive to both explicit and subtle expressions of dissatisfaction, distress or concern.

Complaints will be managed in accordance with the Complaints Policy, ensuring that individuals are treated with respect, fairness and transparency throughout the process.

For individuals aged 18 and over, this includes recognising their right to raise concerns independently and to access advocacy for all students where appropriate.



Outcomes
First Group