

Harmony Alternative Education

Behaviour, Regulation and Relationships Policy

Trauma-informed, attachment-aware, relational and neuroaffirming

Policy owner	Harmony Alternative Education Senior Leadership Team
Approved by	Director or designated policy lead
Effective from	September 2026
Review date	September 2027 or sooner following statutory or organisational change

Compliance statement

This policy is written for Harmony Alternative Education as an Alternative Provision in England. It must be read and applied alongside Harmony's safeguarding, SEND, equality, online safety, health and safety, attendance, complaints and staff conduct arrangements, and the terms of each student's placement or commissioning agreement.

Harmony will implement this policy in accordance with the following primary statutory and national guidance:

- [Keeping Children Safe in Education 2026](#)
- [Working Together to Safeguard Children 2026](#)
- [SEND Code of Practice 0 to 25 years 2015](#)
- [Behaviour in Schools advice for headteachers and school staff](#)
- [Use of reasonable force and other restrictive interventions guidance 2026](#)
- [DfE filtering and monitoring standards and online safety requirements](#)

Harmony also complies with:

- The Children Acts 1989 and 2004,
- Children and Families Act 2014,
- Equality Act 2010,
- Human Rights Act 1998,
- Education Acts 1996 and 2002,
- Online Safety Act 2023,
- Data Protection Act 2018 and UK GDPR, together with current DfE guidance.
- Harmony's Practice is **trauma informed** and **attachment aware** and uses **PACE: Playfulness, Acceptance, Curiosity and Empathy**. PACE supports connection and co-regulation; it does not remove boundaries, safeguarding action, accountability or proportionate protective responses.

1 Policy rationale

Harmony Alternative Education is committed to being a trauma informed and attachment aware community. To ensure that everyone feels safe, the educational environment must be high in both nurture and structure. Young people need predictable routines, clear expectations, reasonable adjustments and consistent yet caring responses. These foundations must be modelled by adults and adapted to individual need.

Improving and maintaining the social, emotional and mental health and wellbeing of students, staff and families is a priority. Young people are more able to engage and learn when they experience safety, belonging and trusted relationships. **Harmony therefore provides an environment and curriculum that support the whole person while maintaining the rights and safety of others.**

Members of the Harmony community may have very different experiences and views of behaviour. This policy provides **shared principles and practices**. Relational responses are central: behaviour is understood in context and as possible communication, while adults retain clear, calm boundaries and respond to harm, risk and safeguarding concerns.

This approach is not permissive. It combines compassion with accountability. **It avoids shame and unnecessary punishment, but it does not minimise harmful conduct or prevent appropriate educational, protective, safeguarding or disciplinary action.**

2 Legislative and guidance framework

This policy has regard to the following legislation and guidance. Links should be checked at each review so that the most recent version is used.

Safeguarding and welfare

- [Keeping Children Safe in Education 2026](#) - statutory safeguarding guidance for schools and colleges
- [Working Together to Safeguard Children 2026](#) - multi-agency safeguarding guidance
- [Children Act 1989](#) - child welfare and safeguarding duties
- [Children Act 2004](#) - co-operation and arrangements to safeguard and promote welfare
- [Prevent duty guidance 2023](#) - safeguarding from radicalisation

SEND equality and rights

- [SEND Code of Practice 0 to 25 years 2015](#) - statutory guidance
- [Children and Families Act 2014](#) - SEND duties and Education Health and Care plans
- [Special Educational Needs and Disability Regulations 2014](#) - SEND procedures
- [Equality Act 2010](#) - non-discrimination and reasonable adjustments
- [Public Sector Equality Duty section 149](#) - due regard where the duty applies
- [Human Rights Act 1998](#) - rights including dignity privacy and protection from degrading treatment

Behaviour safety and attendance

- [Behaviour in Schools](#) - DfE advice, applied proportionately to Harmony's AP status
- [Use of reasonable force and other restrictive interventions guidance](#) - DfE guidance effective from 2026
- [Searching Screening and Confiscation](#) - DfE advice; legal powers depend on setting status and authorised roles
- [Suspension and permanent exclusion including pupil movement](#) - applies directly only to settings within its stated scope
- [Education Act 1996](#) - education and attendance framework
- [Education Act 2002](#) - safeguarding and educational duties
- [Health and Safety at Work etc Act 1974](#) - health and safety duties
- [Protection from Harassment Act 1997](#) - protection from harassment

Online safety data and curriculum

- [Online Safety Act 2023](#) - the wider UK online safety framework
- [DfE filtering and monitoring core standard](#) - safe digital environment and safeguarding oversight
- [Mobile phones in schools](#) - DfE guidance, adapted to individual need and AP context
- [Relationships education RSE and health education guidance](#) - teaching about respectful relationships and online safety
- [Data Protection Act 2018](#) - lawful and secure handling of personal data
- [UK GDPR](#) - data protection principles and rights

Practice frameworks

- [PACE approach](#) - Playfulness Acceptance Curiosity and Empathy; a relational practice framework, not legislation
- [Promoting and supporting mental health and wellbeing in schools and colleges](#) - DfE guidance and resources

Application to Harmony as an Alternative Provision

Some cited guidance is framed specifically for maintained schools, academies, independent schools, colleges or pupil referral units. **Harmony will follow all provisions that apply directly to its legal status and will use the remaining provisions as good-practice benchmarks where appropriate.** Harmony will not claim a statutory power, including a power to search, screen, confiscate, suspend or exclude, unless that power applies to the setting and is exercised by an authorised person. Where a student remains on the roll of a commissioning school, statutory decisions remain with the body legally empowered to make them, and Harmony will share relevant evidence and recommendations.

3 Policy aims

This policy aims to:

- ensure that members of the Harmony community feel physically and emotionally safe and are treated with dignity;
- prioritise connectedness, trust, predictability and transparency so that relationships can flourish and students can become ready to learn;
- support students to develop co-regulation, self-awareness and personally effective pro-social regulation strategies;
- teach students to communicate thoughts, feelings, boundaries and needs safely and accessibly;
- support students through explicit modelling and teaching to develop empathy, responsibility and awareness of the rights and feelings of others;
- maintain high, realistic expectations while making lawful reasonable adjustments and using a caring, low-arousal approach;
- provide a structured, planned and sensory-aware environment that supports engagement and learning;
- challenge and respond to bullying, harassment, discriminatory behaviour, sexual harassment, harmful sexual behaviour and online harm;
- reduce restrictive practice and use it only when lawful, necessary, proportionate and the least restrictive available response;
- work collaboratively with students, families, schools, commissioners and professionals using a plan-do-review cycle.

4 Policy scope

This policy applies to all staff, students, parents and carers, visitors, volunteers, contractors and partner professionals working with Harmony. It applies on Harmony premises; during off-site education, community learning, work-related learning, transport arranged by Harmony and educational visits; when using Harmony networks or devices; and to conduct outside provision where there is a safeguarding concern, a clear impact on the Harmony community or a relevant connection to the placement.

The policy should be read alongside individual Education Health and Care plans, risk assessments, support plans, safety plans and commissioning arrangements. No individual plan may authorise unlawful, degrading, punitive or unsafe practice.

5 Purpose

The purpose of this policy is to provide accessible guidance that can be applied consistently across the provision, while allowing individualised responses. It supports a nurturing and inclusive ethos, safe practice, transparent decision making and regular evaluation with input from students, families, staff, commissioners and relevant professionals.

6 Roles and responsibilities

Senior leaders

Senior leaders recognise the strong interaction between unmet SEND, communication differences, sensory needs, trauma, attachment experiences, physical and mental health, attendance, behaviour regulation and learning. They will:

- ensure this policy is understood, resourced, implemented consistently and reviewed at least annually;
- ensure the Designated Safeguarding Lead and SENDCo are involved when behaviour may indicate safeguarding, SEND or serious mental health need;
- seek to identify underlying needs and patterns early through collaborative assessment and multi-disciplinary working;
- ensure reasonable adjustments, staff training, supervision, debriefing and appropriate interventions are in place;
- monitor records for patterns, disproportionality and possible discrimination, including by protected characteristic, SEND, care experience and placement pathway;
- ensure restrictive interventions and placement-ending decisions receive appropriate senior oversight and are reported to schools, commissioners or statutory partners as required;
- maintain suitable filtering and monitoring arrangements and ensure online safety concerns reach the DSL promptly.

All staff

- build reliable relationships with students and families through a personalised and responsive approach;
- remain professionally curious about the function and context of behaviour, considering communication and sensory needs alongside prior experiences of the young person;
- avoid deficit-based or shaming language;
- and make reasonable adjustments;
- use a calm, low-arousal stance and PACE-informed communication where this is helpful and appropriate;
- model respect, repair mistakes and offer a genuine fresh start;
- follow individual plans, risk assessments, safeguarding procedures and agreed recording requirements;
- act immediately where there is risk of harm, a safeguarding concern, discrimination, bullying, harassment or harmful sexual behaviour;
- seek help early and take part in reflective debriefs and learning reviews;
- remain open to new learning and alternative approaches as indicated by visiting professionals, the evidence base, or as indicated by changes in the presentation of a student.

Students

Students will be supported, according to age, understanding, communication profile and capacity, to understand that they should:

- treat themselves and others with dignity and respect;
- communicate needs, boundaries and concerns as safely as they can;
- use agreed support, regulation spaces and strategies where possible;
- avoid conduct that harms, intimidates, bullies, harasses, discriminates against or sexually harms another person;
- take part in repair, reflection and problem solving when emotionally ready;
- follow reasonable safety instructions, including online and community-safety expectations.

A student's disability, communication needs, trauma history or dysregulation will be considered, but **no student is required to tolerate harm from another person**. Staff will balance individual need with the safety, dignity and rights of the whole community.

Parents, carers, commissioners, and partner professionals:

- share relevant information about need, risk, successful strategies and significant change;
- work collaboratively on plans and reviews;
- raise concerns promptly through the named contact or complaints procedure;
- support consistent safety messages while recognising that approaches may be adapted to need;
- understand that confidentiality may be limited where information must be shared to safeguard a child or another person.

7 Environmental consistency

Predictability and consistent adult practice help students feel safe. Harmony will aim to ensure that:

- staff know this policy and the individual plans relevant to the students they support;
- routines, transitions and expectations are explained in accessible ways and prepared for in advance where possible;
- sensory demands, language load, group size, task demand and environmental triggers are considered;
- students have access to agreed movement, regulation, communication and retreat options without these becoming rewards or punishments;
- adults use connection before correction, while intervening promptly when safety requires it;
- problem solving and restorative opportunities take place when those involved are regulated enough to participate;
- consequences are related, proportionate, time limited, non-shaming and primarily educational or protective.

8 Glossary

The below terms are **essential** to understanding and effectively implementing this policy:

Interoception

Interoception is the process of noticing, interpreting and responding to internal bodily signals, such as changes in heart rate, breathing, temperature, hunger, tension, pain, fatigue and the need to use the toilet. These signals contribute to recognizing emotions, understanding needs and developing self-regulation.

Harmony helps students to notice and understand their own body signals without assuming that everyone experiences or interprets sensations in the same way. Interoceptive work is individualized, consent aware and never used to force eye contact, stillness, disclosure or a particular outward presentation of calm.

An interoceptive lens guides us away from superficial labels such as attention seeking, task avoidance, manipulative or defiant. Such labels can stop professional curiosity. We ask: **What may the student be communicating? What demands, sensory experiences, relationships, memories or unmet needs may be affecting them? What is happening internally? What reasonable adjustment, teaching or support is required?**

Understanding the reason for behaviour does not excuse harm. It helps adults respond safely, teach alternative skills and reduce recurrence. Students are supported to recognize their internal experience, communicate needs in an accessible way and take part in collaborative problem solving **when they are regulated enough to do so.**

Double empathy problem

The **Double Empathy Problem**, formulated by autistic scholar Dr Damien Milton, proposes that communication difficulties between autistic and non-autistic people are not due to a deficit in autistic empathy, but rather a **two-way breakdown** in understanding caused by differing experiential realities and communication styles. More information: <https://www.autism.org.uk/learn/knowledge-hub/professional-practice/double-empathy>

Attunement

Attunement is the reactive, harmonious process of deeply aligning with and responding to another person's emotional states and needs, which fosters a strong sense of safety, validation, and secure connection.

A lack of attunement could result in the **Double-Empathy Problem**.

Positive attunement is central to the **PACE** approach

P.A.C.E

PACE (Dan Hughes) is a widely used, evidence-based approach to communication with all children. It is specifically a trauma-informed framework that uses **Playfulness, Acceptance, Curiosity, and Empathy** to create an environment of safety, trust, and secure attachment for children who have experienced trauma or neglect. More information: <https://cavuhb.nhs.wales/files/resilience-project/resilience-project-logo-adjustments/pace-1-pdf/>

Playfulness. A light, warm tone may reduce tension when the student welcomes it. **Humour must never ridicule, minimise distress** or be used during serious safeguarding disclosure.

Acceptance. Accept the feeling, internal experience or underlying need without approving harmful behaviour. State the boundary calmly and redirect towards a safe alternative. It is not 'wrong', nor is the student, but their behaviour may not be matched to the situation, or they may not be tuned in to their body signals.

Curiosity. Observe without accusation: *"I wonder whether..."* Allow processing time and accept that the student **may not know or be ready or able to explain**. Listen and observe. Give space and time.

Empathy. Acknowledge and validate the student's feelings. Communicate that the student's feelings make sense in context while maintaining safety: "I know this is difficult" ; "I can tell this feels unfair".

A graduated approach



Context

A reward-and-sanction approach may influence the behaviour of some students but will not meet every need and can be counterproductive for students with SEND, communication differences, trauma or disrupted education or attachment experiences. Harmony therefore uses an adaptive graduated response in line with the Equality Act 2010 and the SEND framework.

Fairness does not always mean everyone receives the same response. Equity means providing the support and reasonable adjustments a person needs while protecting the rights of others. Needs may change over time, so **support must remain flexible within an overall structure of consistency.**

Frequent or escalating distress behaviour indicates that assessment, support or environmental adjustment may need to be reviewed. Decisions about placement will use student and parent or carer voice wherever possible, together with evidence from staff, commissioners and relevant professionals. A behaviour concern must not be treated as evidence that a student is unsuitable before reasonable adjustments and unmet needs have been properly considered, unless immediate safety requires an urgent change.

Harmony's Graduated Response in Action:

Step 1

Build resilience and develop regulation

Harmony takes a proactive approach to pro-social behaviour. We recognize that an important part of this approach builds **resilience** and improves our student's ability to **self-regulate**.

We recognize that **trauma and attachment aware** approaches benefit **everyone** who attends Harmony, whilst effectively supporting individuals who have adverse experiences.

Direct teaching occurs when students are sufficiently regulated to learn, not when a student is in crisis.

Direct learning opportunities:

- emotional literacy and personalised recognition of body signals;
- accessible education about stress responses (discussing the *amygdala hijack*, but not presenting simplified brain models as literal diagnostic fact);
- recognition of the roles of **interoception, proprioception, vestibular processing and sensory preferences**;

- teaching of simple self-regulation strategies (grounding, movement, rhythm, breathing, mindfulness or other strategies chosen with the student);
- promotion of communication, consent, boundaries, help-seeking and conflict resolution;
- practice of regulation strategies during ordinary parts of the day, not only during crisis.

Indirect learning

- repeated experience of calm, attuned adults;
- staff who see behaviour as meaningful communication make adjustments, and model safe problem solving;
- staff who use professional curiosity, knowledge of trauma responses, and welcoming language to **respond** rather than **react**.

Step 2

Recognition of effort

Warm relationships, specific feedback, genuine interest and an engaging curriculum are the most powerful forms of recognition. **Praise will be specific, proportionate and sensitive to the student's preferences.** Some students value public recognition; others experience it as uncomfortable or unsafe, whereas some students see reward systems as **demand**, non-achievement of targets or fear of this, can create **anxiety** and induce feelings of **shame**. Tangible rewards may be used transparently and only where **helpful**.

Access to basic needs, relational support, breaks, food, movement, sensory support or dignity will never be made conditional on compliance.

Staff:

- notice and recognize progress in academic skills, social development, emotional self-regulation and independence, including small steps;
- give feedback promptly and describe the action or effort 'I noticed that you asked for help today and I know how hard that is for you', 'I like how you are using that fidget tool to help you focus on your work!', 'holding your pencil like that seems to really help you!';
- avoid comparison, public ranking, coercion and systems likely to induce shame; they avoid pointing out things that students **should** be able to do.
- offer repeated opportunities for a **fresh start**; they do not expect that every bit of learning is retained, or skill mastered, and support students in knowing this too.
- continually review whether a reward system remains **motivating, age appropriate and equitable** for each individual.

Step 3

Establish and maintain relationships

We help all students realize the value of relationships and help them learn how to **establish**, then **maintain relationships** that are **healthy** and impacting positively on their mental health and well-being. This is a skill they will use and develop throughout their life.

To achieve this:

- adults identify and regulate their own triggers before responding;
- differences in culture, identity, neurotype, communication and experience are approached with humility;
- staff greet and acknowledge students so that everyone feels welcomed, valued and ‘seen’;
- staff follow through on commitments or explain honestly when circumstances change;
- adults own their mistakes and repair relationships;
- staff are aware of differing communication styles and ensure they are not perpetuating the ‘**double empathy problem**’
- staff use calm voice, open posture, appropriate personal space and minimal language when they know a student is beginning to become dysregulated;
- relationship is never used to pressure a student into disclosure, physical contact or forgiveness.
- relationship is never conditional on certain behaviours, interactions or communication styles. We know that encouraging children to please us as adults, rather than regulate and respond in their own way, can promote masking behaviours that are contrary to their interoceptive signals, and consequently can be damaging to self-esteem and mental health.

Step 4

De-escalation using PACE

PACE, as described in the glossary earlier in this document, is Playfulness, Acceptance, Curiosity and Empathy. It is used flexibly, not as a script and not when playfulness would feel dismissive, provocative or unsafe. **Connection comes before correction** where possible, but urgent safety action takes priority.

Staff should **reduce language and demand**, offer limited credible **choices**, remove unnecessary **audience**, adjust **sensory** input, allow take-up time and call a trusted adult where appropriate.

Step 5

Additional support

There may be times when a P.A.C.E approach is not effective in supporting a student in the current environment. First, staff will, as much as is practicable, reduce audience, noise, language and non-essential demand. They could then:

- Move other people or, with the student's agreement where possible, support the student to a safer space.
- **Regulate:** provide time, space and co-regulation or sensory strategies.
- **Relate:** reconnect through a trusted adult and PACE-informed communication.
- **Reason:** only when the student is ready, explore what happened, ensure that you gather how much understanding the student has of the situation and their interoception, before you try to teach them sensory alternatives.
- **Repair:** agree proportionate restorative or practical action together. No forced apology or compelled face-to-face contact. This is understood by the student as a temporary rupture in the relationship.
- Review the support plan, risk assessment and reasonable adjustments.

Step 6

Support during crisis

In crisis, cognition, language processing and impulse control may be significantly reduced. We know that students are in their '*survival mode*' – also known as '*Fight, flight, freeze*' or '*amygdala hijack*' and this means they are not fully in control of their responses.

Staff will:

- Be aware of their own regulation- particularly if they have been working with the student whilst they have become dysregulated;
- regulate themselves and seek assistance early;
- consider what the student may feel, need or be communicating;
- consider how the environment is contributing;
- use few words, concrete language, calm tone and non-threatening body language;
- follow the individual safety, risk and co-regulation plan;
- prioritise space, exit routes and the safety of everyone present;
- use physical intervention only within the law and section 13 of this policy;
- contact emergency services where there is immediate serious risk that cannot be managed safely;
- delay reflection, investigation and consequences until the student is sufficiently regulated;
- record, notify and review the incident in line with safeguarding and organisational procedures.

Step 7

Restore, repair and learn:

Relationship rupture is a normal human experience.

Restoration is invited when safe and appropriate; it is not a requirement to forgive, meet or apologise.

Staff will allow time, avoid blame and shame, listen to each person separately where needed and support practical repair.

A restorative conversation may explore:

- What happened?
- What were you feeling or needing?
- Who was affected and how?
- What needs to happen now to make things safer or put matters right?
- What support or different action could help next time?

Consequences, we believe, will be 'natural' and part of learning. For example, a peer may be wary of friendship following a dispute. This response will be discussed and reasoned through a safe relationship with an adult (not between the two students involved).

Sometimes, it may be necessary to review risk assessments for particular activities which may have led to dysregulation, this will be communicated without any blame or shame, but as an opportunity for the student and supporting adult to learn about spotting early signs of dysregulation and preventing escalation in the future, before potentially reintroducing an activity with support.

At times, it may be necessary to review a placement at Harmony, should safety not be achievable for all. This will always be agreed upon with full participation of all parties, including the young person, where it is felt they have sufficient agency.

Whole-group punishment, or individual humiliation, deprivation of food, toilet access, sensory regulation or curriculum entitlement, forced isolation and punitive physical activity are not used as punishments or consequences.

10 Responding to specific behaviours and harms

Bullying, discrimination, harassment and hate incidents

Harmony will act on bullying, prejudice-based conduct, discriminatory language, harassment and hate incidents, including conduct connected to disability, race, religion or belief, sex, sexual orientation, gender reassignment, pregnancy or maternity, age or another aspect of identity.

Support and reasonable adjustment do not mean that the harmed person must continue contact with the person who caused harm.

Incidents will be recorded, safeguarded, investigated proportionately and reviewed for patterns.

Sexual violence, sexual harassment and harmful sexual behaviour

All sexual violence and sexual harassment are unacceptable and are never dismissed as banter, part of growing up or an inevitable feature of adolescence or neurodivergence. Reports will be handled in accordance with KCSIE 2026 and Harmony's safeguarding procedures. The DSL will lead risk and needs assessment, consider the wishes and safety of the person reporting, protect confidentiality as far as possible and make referrals to children's social care or police where required.

Staff will avoid victim-blaming and will not use restorative practice where it may be unsafe, coercive or inappropriate.

Online behaviour

Online behaviour is a safeguarding and relational matter when it affects a student or the Harmony community. This includes cyberbullying, image-based abuse, sexualised communication, grooming, coercion, harassment, hate, impersonation, sharing personal information, accessing harmful content and misuse of generative AI. Staff will preserve evidence where safe, avoid viewing or forwarding illegal sexual imagery, report promptly to the DSL and follow KCSIE and safeguarding procedures.

Harmony will maintain age and risk-appropriate filtering and monitoring for its networks and managed devices, make users aware that monitoring occurs, review effectiveness at least annually and respond to alerts. Monitoring is proportionate and respects data protection rights. Individual student devices and off-site arrangements are governed by the relevant acceptable-use, online-safety and placement arrangements.

Child on child abuse and safeguarding indicators

Behaviour may be a safeguarding indicator or constitute child-on-child abuse. Staff must record and report concerns to the DSL rather than treating them only as behaviour incidents. The DSL decides safeguarding action and information sharing. A lack of verbal disclosure does not mean that harm has not occurred.

11 Educational and protective responses

Responses are selected by considering the student's age and understanding; communication and SEND; intent where it can reasonably be assessed; impact and harm; risk of recurrence; context, including exploitation or coercion; previous support; reasonable adjustments; and the rights and safety of others.

A consequence is not automatically discriminatory because it differs between students; nor is identical treatment automatically fair.

Protective responses may include increased supervision, separation from a particular person, changes to rooms or activities, restricted access to an item or online service, a reviewed safety plan or an urgent placement meeting.

12 Attendance and placement concerns

Harmony is not the student's named school, so Harmony cannot issue a statutory suspension or permanent exclusion. If serious or persistent risk means the placement may need to change or end, Harmony will convene an urgent review with the commissioner (eg LA), named school where relevant, parent or carer, student and other involved professionals as is appropriate in each individual case. The commissioner or school retains its statutory duties and decision-making powers.

Immediate temporary safety arrangements may be made where necessary, but education, safeguarding communication, review and a clear recorded decision must follow promptly.

The current DfE process will be followed in full, including consideration of SEND, discrimination, safeguarding and notification and Harmony will support schools or local authority commissioners in fulfilling these statutory duties.

13 Searching, screening, confiscation and prohibited items

Harmony will act in accordance with the current DfE Searching Screening and Confiscation guidance, but only staff who hold the relevant legal authority may exercise statutory search powers. Other staff may request that a student hand over an item, seek consent and manage immediate risk, following safeguarding procedures. They may, in consultation with Senior leadership, contact a parent or carer, commissioner or police,

Any search must be necessary, proportionate, sensitive to trauma, sex, gender, SEND and communication needs, and conducted with appropriate authorisation, witness and recording. The reason and process should be explained accessibly. Strip searches are never conducted by Harmony staff. If police involvement is considered, the DSL and senior leader must be informed and the safeguards in KCSIE and DfE guidance followed.

Confiscated items will be secured, recorded, returned, retained, disposed of or passed to police according to law, safeguarding need and policy. Staff must not intentionally view, copy or forward suspected indecent images of a child; the DSL must be contacted immediately.

14 Use of reasonable force and restrictive interventions

Harmony follows the current DfE Use of reasonable force and other restrictive interventions guidance. Reasonable force is never used as punishment, to secure compliance where there is no risk, or because a student refuses an educational task. It may be used only where lawful, necessary and proportionate to prevent injury, serious damage or another legally recognised serious risk, and only for the shortest time using the least restrictive option.

- Prevention and de-escalation are attempted where time and risk permit.
- Staff consider known SEND, medical, communication, sensory and trauma needs and follow individual plans.
- Only staff with appropriate competence and training undertake planned restrictive interventions.
- Emergency action may still be required by any person where immediate safety leaves no safer option.
- Breathing, circulation and communication are monitored continuously; techniques that deliberately cause pain or compromise breathing are prohibited.
- The intervention ends as soon as the immediate risk has passed.
- The incident is recorded promptly and parents or carers and commissioners are notified, subject to safeguarding advice.
- The student and staff are offered medical attention, emotional support and separate debriefs.
- Senior leaders review necessity, proportionality, injuries, patterns, reasonable adjustments and prevention.
- Any concern about staff conduct is managed under safeguarding and allegations procedures, not resolved only through this policy.

A student's preference regarding physical contact must be respected wherever possible. A risk assessment does not create advance consent for restraint and cannot remove the requirement to assess necessity and proportionality at the time.

15 Allegations concerns or complaints about staff

Any allegation or concern that an adult may have harmed a student, committed a criminal offence, behaved in a way that indicates risk to children, or behaved in a way that may indicate unsuitability to work with children will be managed under KCSIE 2026 and Harmony's safeguarding and staff conduct procedures, including referral to the Local Authority Designated Officer where the threshold is met.

A report is not described as malicious merely because it is unsubstantiated, unfounded or withdrawn. A deliberately invented allegation may lead to an individualised educational or disciplinary response only

after a fair investigation and safeguarding consideration. The student will not be shamed or deterred from raising future concerns. The staff member will receive appropriate information and support.

16 Engagement with parents, carers and commissioners

Harmony recognises parents and carers as important sources of knowledge about a student and aims to communicate early, clearly and respectfully.

Significant incidents, changes in risk and restrictive interventions will be shared promptly unless doing so would place a child or another person at risk or conflict with safeguarding advice. Students will be involved in communication decisions in line with age, understanding and safety.

Routine concerns should be raised with the student's key adult or named Harmony contact. Unresolved or serious concerns may be escalated to a senior leader and through Harmony's complaints or safeguarding procedures. Commissioners and the student's home school or local authority will be informed in accordance with placement agreements, statutory responsibility and safeguarding need.

17 Recording, information sharing and monitoring

Records will be factual, timely and respectful. They will distinguish observation from interpretation, include the student's voice where possible and avoid stigmatising labels. Records may include antecedents and environmental factors, adjustments offered, the response used, impact and harm, safeguarding decisions, notifications, student and staff debrief, repair and planned changes.

Information is shared on a need-to-know basis in accordance with safeguarding law, KCSIE, Working Together, UK GDPR and the Data Protection Act 2018. Data protection does not prevent necessary and proportionate safeguarding information sharing.

Senior leaders will monitor frequency, location, time, type and seriousness of incidents; use of restrictive intervention; online-safety alerts; attendance and placement changes; and disproportionality affecting groups or individuals. Findings inform training, environmental change, reasonable adjustments and policy review.

18 Staff development and wellbeing

Staff receive induction and refreshers appropriate to their role, including safeguarding.

Training in SEND, communication, trauma and attachment, PACE-informed practice, interoception and sensory regulation, de-escalation, online safety, recording and reasonable force are offered according to role. Training is translated into supervised practice and reviewed after significant incidents.

Harmony acknowledges that supporting distress and crisis can affect staff. Staff are expected to seek help and use debrief and supervision. Staff are expected to take a break following an incident involving a child in crisis.

Support does not replace accountability, safeguarding referral or fair investigation where conduct is questioned.

19 Policy review

This policy will be reviewed at least annually and sooner following a significant incident, statutory or guidance change, organisational change, evidence of disproportionality or feedback showing that practice is not safe, lawful or effective. The review will consider the views of students, families, staff, commissioners and relevant professionals. The linked legal and guidance framework will be checked for updates.

Policy status note

This document is a policy framework for Harmony Alternative Education. Before formal adoption, Harmony should complete the policy metadata, align role titles and recording systems with its actual structure, confirm its legal and registration status and cross-check the wording against current commissioning contracts, safeguarding procedures, insurance and staff training. Where law or statutory guidance changes, the current legal requirement takes precedence over this text.