

# RPI (Restrictive Physical Intervention) Policy

2025-2026



watertonacademytrust.org

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# **Policy Statement**

Waterton Academy trust is committed to safeguarding the welfare of all pupils, staff, and visitors across its schools. Restrictive Physical Intervention (RPI) will only ever be used as a last resort, when there is no other option to prevent immediate harm. Any intervention must always be proportionate to the risk presented, necessary to achieve safety, and lawful in line with statutory requirements.

# 1. Purpose

The purpose of this policy is to provide clarity for all staff on the safe and lawful use of RPI. It aims to:

- Ensure that all staff understand their responsibilities and the legal boundaries of RPI.
- Embed a culture of positive behaviour management where the use of RPI is rare and only applied when strictly necessary.
- Provide clear procedures for recording, reporting, and reflecting on incidents of RPI.
- Support compliance with all relevant legislation and statutory guidance.
- Protect pupils' rights and dignity while also protecting staff from allegations or harm.

# 2. Scope

This policy covers:

- Primary Schools within the Trust.
- Pre-School settings within the Trust.
- Specialist SEND schools or SEND provision operated by the Trust.

It applies to all staff, governors, volunteers, and visiting professionals who may work directly with pupils.

# 3. Legal Framework

Staff have a legal right to use reasonable force to prevent pupils from harming themselves, others, or property, or from severely disrupting good order in the school. This is supported by:

- Education and Inspections Act 2006 (Section 93) providing authority for staff to use reasonable force.
- Children Act 1989 emphasising the duty of care to safeguard children.
- Education Act 2002 requiring schools to promote positive behaviour.
- Equality Act 2010 ensuring no pupil is discriminated against when managing behaviour.
- Health and Safety at Work Act 1974 requiring schools to provide a safe environment for staff and pupils.
- DfE Guidance: Use of Reasonable Force (2013, updated 2025).
- Behaviour in Schools (DfE, 2013, updated 2024).

#### 4. Definition and Thresholds

Restrictive Physical Intervention (RPI) refers to any physical act intended to restrict a pupil's movement or control their behaviour when verbal strategies are insufficient to prevent harm. Examples include:

- Holding a pupil to prevent striking another person.
- Blocking a doorway to stop a pupil running into danger.

#### RPI does not include:

- Comforting touch or guided movement that is non-restrictive.
- Physical contact used to support learning or care needs.

An intervention must only occur where there is an immediate and significant risk of harm to the pupil, others, or property, and where failure to act would result in injury or serious disruption.

All staff must record the objective risk threshold that justified the intervention. Use the checklist on the RPI form to specify which of the following applied:

- Imminent risk of physical injury to the pupil or others
- Risk of serious property damage likely to cause injury
- Risk of severe disruption threatening safety

Subjective terms such as "significant" or "immediate" must be supported by a short factual description of the behaviour and the foreseeable harm if no action had been taken.

# 5. Principles

The following principles underpin this policy:

- RPI must always be a last resort and only used to prevent significant harm.
- Staff must use the minimum force necessary, for the shortest possible time.
- De-escalation techniques should always be prioritised before any physical intervention.
- The dignity and rights of the pupil must be upheld at all times.
- RPI must never be used as a punishment or out of anger.
- Staff must act within the scope of their training.
- All incidents of RPI must be reported, recorded, and reviewed.

# 6. Authorised Staff and Training

Only staff who have received accredited training (e.g., Team-Teach or equivalent) are authorised to use RPI as part of day to day provision. We have staff who hold the Team Teach Trainer Accreditation within the Trust. These staff members train all staff to ensure consistency of purpose and approach. This ensures interventions are safe and consistent. Training must:

- Be updated at least every 12–18 months.
- Include de-escalation, risk assessment, and safe intervention techniques.
- Be adapted to meet the needs of EYFS and SEND contexts.

Each school will maintain a training log recording the names of all staff who have completed accredited RPI training, the level and date of training, refresher dates, and expiry.

Copies of current training records must be available for Trust audits and inspection. Staff who have not completed or maintained accredited training must not take part in planned RPI.

All new staff will receive an induction covering the principles of behaviour management, positive handling, and safeguarding expectations relating to RPI.

Staff have a duty of care to act where a failure to intervene would likely result in serious harm. While trained techniques are preferred, deliberate inaction in such situations may constitute a breach of duty.

#### **Untrained Staff in Exceptional Circumstances**

While only trained and accredited staff are authorised to use Restrictive Physical Intervention (RPI) in planned situations, under Section 93 of the Education and Inspections Act 2006, any member of school staff may use reasonable force in an emergency where:

- Immediate action is required to prevent serious injury or danger, and
- No trained staff member can respond in time.

Any such action must:

- Be limited to the minimum force necessary for the shortest time possible.
- Avoid any hold or position likely to restrict breathing or cause pain.
- End as soon as the risk is controlled.

The incident must be reported immediately to the Headteacher or senior leader and recorded using the RPI Incident Report Form. The report must clearly state that the staff member was untrained and describe:

- The nature of the emergency,
- The specific risk being managed,
- The actions taken and duration,
- Who was present and any witnesses,

- · Any injury or distress caused, and
- What post-incident support or training followed.

The Headteacher must review these incidents within 24 hours.

#### **Staff Medical Fitness and Temporary Exemptions**

Participation in Restrictive Physical Intervention (RPI) requires staff to be physically fit to carry out approved techniques safely.

- Staff who are pregnant, recovering from injury, or have a medical condition that could be aggravated by physical intervention must inform their Headteacher or line manager immediately.
- The Headteacher will carry out a risk assessment in consultation with the staff member and, where needed, Occupational Health.
- The assessment will determine whether the staff member should be temporarily exempt from taking part in RPI or restricted to specific duties (for example, de-escalation or observation only).
- Staff must not be directed to participate in RPI if doing so would compromise their own safety or that of others.

#### 7. Procedures for RPI

#### **Preventive Measures**

The Trust promotes positive behaviour management to reduce the likelihood of incidents requiring RPI. Preventive measures include:

- Carrying out risk assessments for pupils known to display challenging behaviour. Risk assessments for pupils known to display challenging behaviour should use the Trust's standard template (Appendix 3) to ensure consistency and clear identification of triggers and strategies. These should be reviewed regularly, and after any incident of RPI.
- Creating Individual Behaviour Plans (IBPs) and Positive Handling Plans.
- Adjusting learning environments to minimise triggers.
- Providing sufficient staffing and supervision for high-risk pupils.
- Using restorative approaches to address conflict.

#### **During Intervention**

Staff should refer to the RPI Decision-Making Flowchart checklist (Appendix 2) to guide their judgement on necessity, proportionality, and post-incident actions.

When RPI is necessary:

- Staff must remain calm and act with control.
- Only the minimum force required should be applied.
- Holds or positions that could restrict breathing or cause pain must be strictly avoided.
- Staff must continuously monitor the pupil's safety and wellbeing during the intervention.

Waterton Academy Trust, Centre For Excellence, Walton Primary Academy, The Grove, Wakefield, WF2 6LD 01924 240767 Machine watertonacademytrust.org watertonacademytrust.org The intervention should be ended as soon as it is safe to do so.

#### After Intervention

Following any use of RPI:

- The pupil should be given time and space to calm down regulate and should be supported emotionally.
- Staff involved should also receive support. The Headteacher will monitor staff wellbeing and arrange follow-up where necessary. Staff and pupil debriefs must follow the structured questions provided in Appendix 4 to ensure emotional recovery and professional reflection.
- Any staff injury must be recorded in line with Health and Safety procedures and RIDDOR requirements where relevant.
- An RPI Incident Report Form (Appendix 1) must be completed as soon as possible.
- A neutral staff witness statement must be attached for any incident involving injury, restraint over one minute, or distress requiring medical attention.
- Risk assessments and behaviour plans must be updated promptly
- Parents/guardians must be notified the same day. Parents/guardians must be offered a meeting if an
  incident results in injury, emotional distress, or repeated restraint.
- The Headteacher must review the incident and ensure learning is applied to practice.

Failure to follow the reporting, recording, or review procedures, or use of any unauthorised technique, may lead to management or disciplinary action under the Staff Code of Conduct.

# 8. Monitoring and Review

Each school must maintain a central RPI log on CPOMS. RPI records must be updated within 24 hours of every incident and reviewed weekly by the senior leadership team.

#### Headteachers must:

- Check for injuries immediately after the RPI and ensure medical assessments are recorded where applicable.
- Review and sign each RPI Incident Report within 24 hours on CPOMS.
- Identify repeated incidents involving the same pupil or staff member.

The Trust's Head of SEND and Inclusion will conduct audits of school logs to ensure accuracy and consistency. At Trust Behaviour Networks samples of RPI logs will be reviewed to share and strengthen practice. The Trust Board will review aggregated data annually.

# 9. Governance and Accountability

The Trust Board holds ultimate accountability for the safe and lawful use of Restrictive Physical Intervention (RPI). The Head of SEND and Inclusion is the designated Trust lead responsible for oversight, policy compliance, and annual reporting.

#### Each Headteacher must:

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- Ensure all RPI incidents are reviewed by them within 24 hours.
- Maintain accurate records and submit data returns to the Trust.
- Escalate any pattern of repeated restraint for the same pupil to the DCEO and Head of SEND and Inclusion.

All staff must sign an annual declaration confirming that they have read, understood, and will comply with this policy and the related Behaviour, Safeguarding, and Code of Conduct policies. The declaration template is provided in Appendix 5.

# 10. Disputes

If a parent or carer disputes the accuracy of an RPI record, they may request a written independent review within ten school days. The Trust will appoint a reviewer not involved in the incident or school to assess the record, evidence, and actions taken. The outcome, rationale, and any recommendations will be logged on CPOMs. Following this, if the parent remains dissatisfied, then can follow the school Concerns and Complaints policy.

# 11. Record Storage and Data Protection

All RPI records, including incident forms, logs, and supporting evidence, must be stored on CPOMS in line with the Trust's Data Protection and Records Management Policies.

- Paper copies must be kept in locked storage accessible only to the Headteacher and designated safeguarding leads.
- Electronic records must be held on the Trust's secure system (CPOMS) with restricted permissions.
- Individual incident records will be retained for at least seven years, or longer if linked to safeguarding, complaint, or legal proceedings.
- Parents, carers, and relevant professionals may access records under Data Protection legislation, subject to redaction of third-party information.
- Any data shared for monitoring or training purposes must be anonymised.
- Disposal of records must follow the Trust's retention schedule and GDPR deletion protocols.

# 12. Safeguarding and Duty of Care

All use of RPI is a safeguarding matter. Any incident resulting in harm must be reported via the Trust's safeguarding procedures and discussed with the Head of SEND and Inclusion, and the DCEO. Where necessary, concerns will be referred to the Local Authority Designated Officer (LADO) or other external agencies. Safeguarding considerations must always outweigh behaviour management concerns.

Where there is credible evidence of parental coaching, deliberate provocation, or fabrication intended to generate an RPI incident, the Headteacher will treat this as a safeguarding concern and progress it through the Trust's safeguarding procedures.

# 13. Equality Considerations

The Trust is committed to ensuring fair treatment for all pupils. When applying RPI:

- The needs of pupils with SEND must be considered and reasonable adjustments made.
- Factors such as age, disability, gender, and cultural background must be respected.
- Plans for high-risk pupils must be individualised and co-produced with families where possible.

To ensure transparency and improvement, the Trust will:

- Analyse RPI data termly by school, pupil characteristics, and intervention type.
- Identify and address disproportionate patterns (e.g., by gender, SEND, ethnicity).
- Report key findings to the Academy Standards Committee.
- Use data outcomes to inform training, environment adjustments, and leadership oversight.

#### 14. Related Policies and References

- Behaviour Policy
- Safeguarding and Child Protection Policy
- Health and Safety Policy
- SEND Policy
- Staff Code of Conduct
- Complaints Policy
- Data Protection and Records Management Policy
- Whistleblowing Policy

Together these documents set the framework for safe, lawful, and proportionate practice across the Trust.

#### 15. References

- Education and Inspections Act 2006, Section 93.
- Health and Safety at Work Act 1974.
- Children Act 1989.
- Equality Act 2010.
- DfE Guidance: Use of Reasonable Force (2013, updated 2025).
- Behaviour in Schools (DfE, 2013, updated 2024).
- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

Document Detail	
Document Name:	RPI Policy

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# **Appendix 1 - RPI Incident Report Form**

Purpose: This form ensures accurate and timely reporting of any Restrictive Physical Intervention (RPI) occurring within the Trust, promoting accountability and reflection.

Date & Time of Incident	
Location	
Pupil(s) Involved	
Staff Involved	Role and specific actions of each staff member (lead hold, support hold, de-escalation, observer, first aider)
Reason for Intervention	<ul> <li>□ Imminent risk of physical injury to the pupil or others</li> <li>□ Risk of serious property damage likely to cause injury</li> <li>□ Risk of severe disruption threatening safety</li> </ul>
Description of Behaviour	Short factual description of the behaviour and the foreseeable harm if no action had been taken.
Description of RPI Used - including timings	
De-escalation Techniques Attempted	
Outcome / Resolution	
Witnesses	
Parental Notification	
Follow-up Actions	

# **Appendix 2 - RPI Decision-Making Checklist**

Purpose: This flowchart provides a structured pathway for staff to follow when considering the use of Restrictive Physical Intervention (RPI). It ensures that decisions are lawful, necessary, proportionate, and in the pupil's best interests.

#### Step 1: Identify Risk

Assess the situation and determine if there is an immediate risk of harm to the pupil, others, or property.

#### Step 2: Attempt De-escalation

Use de-escalation strategies first—verbal communication, reassurance, or environmental changes—consistent with the pupil's plan.

#### • Step 3: Evaluate Necessity

Only proceed with RPI if not acting would result in serious harm or danger. If not essential, do not use RPI.

#### • Step 4: Use RPI if Necessary

Apply the minimum force necessary, for the shortest time, avoiding techniques that could restrict breathing or cause pain.

#### • Step 5: Post-Incident Actions

Provide reassurance, complete the RPI report, notify parents, and conduct staff and pupil debriefs.

# **Appendix 3 - Individual Risk Assessment Template for SEND Pupils**

**Purpose:** This template supports identification and management of pupils who present an increased likelihood of behaviour that may require RPI, ensuring proactive risk mitigation and pupil safety.

Area	Strategies/ Notes
Pupil Name / DOB	
Diagnosis / SEND Needs	
Triggers for Behaviour	
Warning Signs- Hierarchy/ stages	
Preventative Strategies	
De-escalation Techniques	
RPI Techniques Approved	
Staffing Requirements	
Medical Considerations	
Review Date	
Responsible Staff	
Other points of note	

# **Appendix 4 - Staff & Pupil Debrief Questions**

Purpose: Following an RPI, structured debriefs allow reflection, recovery, and continuous improvement. This form ensures emotional support and professional accountability.

- Was the intervention necessary and proportionate?
- Were approved techniques used correctly?
- Was the incident reported and recorded accurately and promptly?
- Was medical or emotional support provided to the pupil?
- Has the pupil's plan been updated as required?
- Have staff received post-incident support?
- Do training or policy changes need to be considered?

# **Appendix 5 – Staff Declaration: Restrictive Physical Intervention** (RPI) **Policy**

Purpose: This declaration confirms that the signatory has read, understood, and agrees to follow the Waterton Academy Trust Restrictive Physical Intervention (RPI) Policy. It ensures all staff understand their legal responsibilities, reporting duties, and boundaries of authorised practice.

#### Staff Declaration

#### I confirm that:

- 1. I have read and understood the Waterton Academy Trust Restrictive Physical Intervention (RPI) Policy
- 2. I understand that RPI must only ever be used as a **last resort**, in line with the principles of necessity, proportionality, and safety.
- 3. I am aware of my **legal responsibilities** under Section 93 of the Education and Inspections Act 2006 and related Trust policies (Behaviour, Safeguarding, SEND, Health and Safety, and the Staff Code of Conduct).
- 4. I understand that:
  - o Only staff with current accredited RPI training may undertake planned RPI.
  - o Any untrained use of reasonable force is lawful only in an **emergency** and must be reported immediately.
  - All incidents must be recorded using the RPI Incident Report Form and submitted within the required timescales.
- 5. I agree to take part in ongoing training, supervision, and debrief as required by the Trust.
- 6. I understand that failure to comply with this policy, or misuse of RPI, may result in disciplinary action.

Full Name:	
Job Title / Role:	
School / Setting:	
Date of Last Accredited RPI Training (if	
applicable):	
Training Expiry Date:	
Staff Signature: Date:	

#### **Record Management**

A copy of this declaration will be:

- Held on the staff personnel file.
- Logged on the school's RPI training register.
- Reviewed annually as part of the RPI training audit and policy compliance checks.