

	Name	Date	Review Date
Written by	Debbie Goode	01/04/2026	01/09/2026
Reviewed & updated	Ryan Goodwin	01/04/2026	01/09/2026

Legal Status

This policy has regard to:

- The Education (Independent School Standards) Regulations 2014, Part 3 (specifically paragraph 9 regarding behaviour).
- The Equality Act 2010.
DfE guidance “Behaviour in Schools” (updated February 2024). Updates included clearer expectations on mobile phone use, strengthened guidance for pupils with SEND, and the importance of consistent staff training.
- Keeping Children Safe in Education (KCSIE) 2025 (and relevant DfE statutory guidance, including the Data (Use and Access) Act 2025 and DSL cover expectations).
- The Ofsted Education Inspection Framework, particularly the “Behaviour and Attitudes” judgment.
- Independent School Standards Guidance (DfE, April 2026)
- Children and Families Act 2014 (in particular the duties relating to pupils with special educational needs and disabilities)
- Education Act 2002, Section 88 (headteachers power to regulate behaviour)

Policy should be read in conjunction with:

- The School’s Aims and Ethos.
- Anti-Bullying Policy.
- Safeguarding Policy.
- Complaints Policy and Procedures.
- SEND Policy.

This is a whole-school policy and includes ‘Use of Reasonable Force’.

Availability

This Policy is made available to staff, parents and pupils via the school website or on request, a paper copy may be obtained from the School Office.

Monitoring and Review

This policy is subject to continuous monitoring, refinement, and audit by the Headteacher and Head of Centre

Rational

This policy sets out how TILT Education promotes positive behaviour, prevents bullying, and supports pupils with SEMH and SEND needs. We use a clear framework of expectations (TILT Pupil Agreement), a structured Star Chart reward system, and a supportive three-strike warning process. Behaviour is monitored daily and analysed regularly to inform early intervention. Rewards, sanctions, and restorative practice are applied consistently and fairly. Parents, carers, and pupils are partners in this process

This policy applies to all pupils of TILT Education at all times when they are: on the school premises; travelling to or from school (including in school transport); on school-organised activities off-site; and online or on social media where their behaviour has, or could have, an impact on the school community, staff, or other pupils.

Ethos

TILT Education provides high-quality provision for young people with additional needs, including those with Social, Emotional and Mental Health (SEMH) difficulties. We offer a safe, nurturing environment where pupils develop the skills, confidence, and independence needed to raise aspirations and meet the challenges of an ever-changing world.

- We have high expectations for behaviour and work to create a respectful, supportive environment where positive behaviour is encouraged, reinforced, and celebrated. Poor behaviour is addressed fairly and consistently, using sanctions when necessary.

Our approach is based on:

- Promoting self-discipline, responsibility, and respect.

- Creating a safe, caring, and inclusive environment.
Valuing and listening to the views of pupils and parents/carers (in line with Article 12, UNCRC).
 - Analysing behaviour patterns to inform interventions, particularly for bullying or discriminatory behaviour.
 - Making reasonable adjustments for pupils with SEND and SEMH needs – including flexible use of regulation breaks, sensory aids, differentiated expectations, and individual Positive Behaviour Support Plans (PBSPs) – to ensure fairness and compliance with the SEND Code of Practice 2015.
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Aims

- Ensure the policy is clear and understood by pupils, staff, and parents.
 - Provide a safe, happy, and orderly environment.
 - Support staff with consistent behaviour management strategies.
 - Promote good behaviour through clear rights, responsibilities, and conduct.
 - Encourage pupils to develop self-awareness, self-control, and resilience.
 - Prevent bullying and antisocial behaviour by reinforcing respect for others.
 - Build positive relationships between school, pupils, families, and the wider community.
 - Demonstrate impact through regular review of behaviour data, attendance, exclusions, rewards earned, and pupil/parent feedback.
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How we Achieve This

- A clear TILT Pupil Agreement, co-created with pupils, visible around the school, and regularly referred to.
 - A consistent system of praise, rewards, and sanctions understood by all.
 - Staff modelling positive behaviour and respectful relationships.
 - Regular assemblies and targeted interventions to promote SMSC development.
 - Behaviour data reviewed weekly by tutors and half-termly by SLT/SENCo, with findings shared with staff and parents where appropriate.
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Role and Responsibilities

Headteacher & Head of Centre

- Define acceptable behaviour standards.
- Ensure staff, pupils, and parents understand and apply the policy.
- Promote positive relationships and prevent bullying.
- Monitor behaviour, support staff, and review the policy annually.
- Report annually to School Improvement Partners on behaviour trends and policy impact.

Teachers

- Deliver well-planned, engaging lessons that support good discipline.
- Monitor behaviour and pupil progress.
- Work closely with leadership, staff, and parents to support pupils.
- All Staff
- Model respect, fairness, and consistency.
- Encourage positive behaviour and address unacceptable behaviour calmly.
- Apply rewards and sanctions consistently.
- Seek to understand underlying causes of behaviour.
- Record and share behaviour concerns; attend training as required.
- Engage in regular CPD on de-escalation, SEMH awareness, and restorative practice.
- Access supervision and wellbeing support via Health Shield to manage the emotional demands of behaviour management.

Pupils

- Follow the TILT Pupil Agreement.
- Show respect for staff, peers, and the school environment.
- Use respectful language and behaviour.
- Attend sessions punctually and follow instructions.
- Take responsibility for their actions and learning.
- Provide feedback on behaviour policy effectiveness through survey

Parents/Carers

- Support the policy and the TILT Pupil Agreement.
- Reinforce the importance of good behaviour and respect.
- Maintain positive communication with the school.
- Celebrate positive behaviour with the school (calls home, postcards, reward events).
- Work with staff to support their child's development.

Supporting Pupils with SEND

For pupils with identified SEND or SEMH needs, a Positive Behaviour Support Plan (PBSP) must be in place before or at the earliest opportunity after admission, and must be available to all staff who work with the pupil. The PBSP will:

- describe triggers, early-warning signs, de-escalation strategies, sensory or regulation aids, and reasonable adjustments;
- record any planned or authorised restrictive practice and the evidence-based rationale for it; and
- be reviewed at least termly or sooner following any serious incident.

Before any formal sanction or restrictive intervention is applied to a pupil with SEND, staff must record why the behaviour is not wholly attributable to the pupil's identified SEND and why less restrictive strategies were insufficient. No pupil will be penalised for behaviour that is a direct consequence of their identified SEND.

Parents/carers and relevant professionals are involved in termly PBSP reviews and kept informed of progress, in accordance with the Children and Families Act 2014.

We believe pupils achieve their full potential in a happy, structured, and respectful environment. By working in partnership with pupils, parents, and staff, we create a school community where positive behaviour is the norm, difficulties are addressed fairly, and every child is supported to succeed.

Methodology

Rules (Five-point Code for Behaviour):

1. Hand in their mobile phone after breakfast club. This rule operates alongside the school's Mobile Phone Policy and KCSIE (2026) guidance on mobile devices; hand-in and storage arrangements are applied consistently to support safety and behaviour management.
2. Take care of each other, equipment and our school building.
3. Be kind and respectful.
4. Follow staff instructions the first time.
5. Work hard and encourage each other.

Star Chart System:

- **Linked to clear, tangible rewards (certificates, vouchers, trips, privileges).**
- **Includes peer-to-peer recognition (pupils nominating each other for respect/kindness).**

Behaviour Review:

- Pupil Star Charts are reviewed daily with tutors.
- **Behaviour logs are added to LearnTrek and reviewed half-termly by SLT/SENCo to identify trends and inform early interventions.**
- **Parents receive a summary of behaviour progress at least once per term.**

Pupil's behaviour is recorded daily in their Star Chart. (Please See PupilStarChart.doc) To enable us to further monitor pupil behaviour and to engage pupils in the behaviour process. All pupil's design the front cover of their Star Chart at the beginning of each half term or on their first day at TILT Education. During these sessions we will informally discuss the TILT Pupil Agreement, remind pupils about the rules and encourage pupils to set personal targets to support them in maintaining positive behaviour.

To make these sessions different each half term we introduce different activities – E.G Pupil Agreement Quiz, fill in the missing words of the pupil agreement, correct the spelling mistakes, Art and Craft front cover activities, plan a reward activity day.

The Star Chart/ Reward System allows pupils to earn 4 stars each throughout the day. Pupils can earn one star for each of their 4 daily lessons. To earn a star pupil's must

1. Hand in their mobile phone
2. Stay in the classroom/ unless given permission to leave
3. Display respectful behaviour in the classroom
4. Completion of set work

Three-strike warning system

The school operates a supportive **three-strike warning system** to help pupils manage their behaviour fairly and consistently. Each pupil is given clear expectations and reminders: the **first strike** serves as a gentle verbal reminder to help the pupil reflect and re-engage; the **second strike** is a warning that the behaviour needs to change, with staff offering strategies or support to regulate emotions; and the **third strike** will result in loss of a star.

Staff implement the system with consistency and sensitivity, always considering a child's personal regulation strategies and triggers, and using the process as an opportunity to teach and reinforce positive behaviour rather than simply applying sanctions.

Restorative practice is embedded throughout this process; sanctions are always proportionate and used alongside opportunities to repair relationships.

Strike 1 → Gentle Reminder

- Calm, positive verbal reminder of expectation
- Opportunity to self-regulate (use calm corner, sensory aid, or breathing strategy)



Strike 2 → Formal Warning

- Clear, calm statement of behaviour that needs to change
- Offer support/strategy (e.g. movement break, regulation tool, staff check-in)
- Record incident if needed



Strike 3 → Consequence with Support

- Proportionate response (loss of star, time out, restorative chat, removal from activity if needed)
- Staff support pupil to regulate emotions
- Restorative conversation before returning to learning



Follow-Up

- Behaviour reflected upon with staff or form tutor when calm
- Restorative practice used to repair relationships
- Record kept to monitor patterns and support needs

At the end of each day form tutors review star charts with their pupils. Daily behaviours are then added onto our MIS system LearnTrek this helps staff to identify patterns and trends (e.g., triggers, frequency, times of day) can be identified to support interventions.

What are the school's 'powers' and responsibilities?

- We understand that teachers have a statutory authority to discipline pupils whose behaviour falls below the standard which could reasonably be expected of them. This means that when a pupil breaks a school rule or fails to follow a reasonable instruction the teacher can impose a sanction on that pupil.
- The punishment will be proportionate and appropriate
- We know that this power applies to all paid staff with responsibility for pupils.
- We know that staff can discipline pupils at any time the pupil is in school or elsewhere under the charge of a teacher and this includes any activities off-site.
- We understand that we have the power to impose an isolation outside of school hours.

Isolation, Time Out and Seclusion

Isolation refers to the supervised removal of a pupil from their class or learning group to a designated area elsewhere in the school. The pupil remains within school premises, is in the sight of a member of staff at all times, and is not physically prevented from leaving. Isolation may be used as a sanction or as a short-term pastoral intervention. All uses of isolation are recorded on LearnTrek and parents/carers are informed on the same day wherever possible.

Time out is a self-regulatory strategy in which a pupil is offered or requests the opportunity to move to a calmer space to manage their emotions. Time out is always voluntary and the pupil is free to leave at any point. It is not a sanction.

Seclusion is the involuntary confinement of a pupil alone in a room or area from which they are prevented from leaving. Seclusion is only lawful where it is necessary to manage an immediate safety risk and no less restrictive option is available. Seclusion will:

- never be used as a punishment or routinely;
- The school does not rely on CCTV as a substitute for direct observation. Any CCTV use as an exception must be supported by a documented clinical/therapeutic rationale recorded in the pupil's PBSP, pre-approved by the DSL/Head of Centre, specify who will monitor it in real time, and be recorded in the incident log;
- be time-limited and only used for the minimum time necessary; welfare-checks must be recorded at least every 10 minutes, with timestamps logged on LearnTrek;
- trigger a same-day review by the DSL/Head of Centre and a revision of the pupil's risk assessment and PBSP; and
- prompt a multi-agency review (including the SENCo and parents/carers) if used more than once for the same pupil within a half term.

Parents/carers will be provided with written notification on the same day wherever possible. If same-day written notification cannot be provided, the school will telephone parents/carers the same day and send written confirmation the next working day.

Seclusion checklist (staff must complete before, during and after seclusion): named supervisor confirmed on duty; start time recorded; welfare-check timestamps logged on LearnTrek every 10 minutes; DSL notified (time and name recorded); end time recorded; post-incident debrief arranged; and LearnTrek incident record completed the same day.

- We understand that some behaviours may give cause to suspect that a pupil is suffering, or is likely to suffer, significant harm. If this is the case, the school will follow its Pupil Protection and Safeguarding procedures.
 - Corporal punishment is prohibited in all circumstances. The use of any form of corporal punishment by any member of staff is unlawful and will constitute a disciplinary matter. This prohibition applies to all pupils at TILT Education at all times.
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Prevention

Unacceptable behaviour is best avoided through clear expectations and consistent routines. Staff are expected to:

- Be on time, prepared, and ready to greet each class with a well-structured lesson that includes pace, balance, and differentiation.
- Ensure an orderly start and finish to lessons, including clear routines for entry, seating, and movement.
- Know pupils well, taking account of individual needs, learning styles, and group dynamics.
- Provide lessons with clear beginnings, purposeful learning, and timely conclusions.

Sanctions

When poor behaviour occurs, pupils are encouraged to reflect on their choices and consider positive alternatives. Poor behaviour includes any actions that breach school rules, including malicious allegations against staff.

Sanctions will be applied fairly, proportionately, and where possible in the following order:

1. Verbal warning, reflection, and restorative discussion.
2. Loss of stars/points linked to behaviour.
3. Loss of privileges (e.g. working through break).
4. Communication with parents/carers (call, text, or email).
5. Formal warning letter.
6. Period of reflection outside normal hours (48 hours' notice given for parental arrangements).
7. Removal from rewards or trips.
8. In rare and serious cases, temporary or permanent exclusion (see Exclusions Policy).

Pupils are always given the opportunity to explain their perspective. Where needed, written or scribed statements and witness accounts will be gathered to ensure fairness.

Possession or Use of Vaping Devices

At TILT Education, we are committed to maintaining a safe, healthy and respectful environment for all pupils, staff and visitors. In line with national health guidance and our safeguarding responsibilities, the school operates a strict no-vaping policy.

Vaping devices (including e-cigarettes and vapes) must not be brought into school or used at any time. Pupils are reminded to leave vapes at home and must not use, carry, or share them while travelling to and from school — including in school transport such as taxis or minibuses — or when arriving at or leaving the school site.

Any pupil seen vaping in a taxi, on entry to the school grounds, or while on school premises will be considered to have committed a serious breach of the school's Behaviour Policy. In accordance with this policy, such behaviour will result in a fixed-term exclusion.

If a pupil is found in possession of a vape, they must hand it to a member of staff before entering the school. Confiscated items will be stored securely and may only be collected by a parent or carer. If a pupil refuses to hand over a vape when requested, they will not be permitted to enter school and the incident will be treated as a serious disciplinary matter, which may also lead to exclusion.

In accordance with the *Department for Education's Searching, Screening and Confiscation (July 2023)* guidance, staff have the legal authority to search a pupil's possessions without consent if there are reasonable grounds to suspect that a prohibited item, such as a vape, is being carried.

Confiscated items will be recorded and handled in line with school procedures.

While the school takes breaches of this policy seriously, we also recognise the importance of a supportive and educative approach. Incidents involving vaping will be used as opportunities to discuss the health, legal and social risks associated with vaping. The school will work in partnership with pupils, parents, carers and external agencies to provide guidance and support, helping pupils make informed decisions that protect their health and wellbeing.

Exclusion and Alternatives

Exclusion is used only in serious circumstances. Where appropriate, an Inclusion Support Programme may be offered as an alternative, combining home tuition with targeted PSHE support to help pupils understand and change their behaviour.

Positive Support & Reasonable Force

We recognise that pupils may present challenging behaviour linked to trauma or SEMH needs. Staff prioritise de-escalation strategies before considering any form of restrictive intervention. Where restrictive interventions (including physical intervention, restraint or seclusion) are required, staff will only use them when absolutely necessary to prevent a pupil from causing imminent harm to themselves or others or to prevent serious damage to property. Restrictive interventions will:

- Changing activity or environment
- Positive reinforcement of behaviour systems
- Calming activities (creative/meditation)
- Staff change or room change

All physical interventions and any use of restrictive practices are governed by:

- be used for the shortest time necessary and never as a punishment;
- follow an individualised risk assessment and Positive Behaviour Support Plan (PBSP) that documents the rationale and any reasonable adjustments for SEND/SEMH needs;
- be carried out only by staff who have received approved training and whose competence has been evidenced and recorded; and
- be recorded in full on LearnTrek on the same day (see Annexe A).

Section 93 of the Education and Inspections Act 2006

Restrictive Interventions, Including Use of Reasonable Force, in Schools (DfE, April 2026)

- The Schools (Recording and Reporting of Seclusion and Restrictive Interventions) Regulations 2025

DfE "Behaviour in Schools" guidance (February 2024)

Keeping Children Safe in Education 2025 (KCSIE 2025).

Our ethos prioritises de-escalation, positive touch approaches (reassurance, redirection, distraction), and therapeutic responses over restraint. Physical intervention is never used as a punishment. Every intervention is underpinned by an up-to-date individualised risk assessment and, for pupils with SEND or SEMH needs, a current PBSP.

All staff authorised to use restrictive interventions must complete approved physical intervention and de-escalation training (PRIME) on appointment and receive annual refresher training. Attendance alone is not sufficient: the Head of Centre records a competency check for each authorised staff member (observation or assessed practical demonstration) and retains these records. Training records show the provider, content, dates, and evidence of competence and are available for inspection.

Following any use of physical intervention, the member of staff must complete, on the same day wherever possible, a written incident record on LearnTrek. As a minimum, this record must document: (1) the name and

date of birth of the pupil; (2) the date, time, and duration of the intervention; (3) the names of all staff involved; (4) the type of restrictive intervention used and the technique applied; (5) the specific behaviour that made the intervention necessary; (6) a description of any de-escalation or alternative strategies attempted before the intervention; (7) whether any injury was sustained by the pupil or any member of staff, and if so, whether medical attention was sought; and (8) any immediate follow-up support provided to the pupil. The DSL or Deputy DSL must be informed immediately. All staff involved must participate in a post-incident debrief to review the incident, support staff wellbeing, and consider whether adjustments to the pupil's behaviour support or risk assessment are required. All incidents are reviewed by the DSL as part of the school's safeguarding and governance oversight.

Parental notification: When a restrictive intervention or seclusion has been used, TILT Education will provide parents/carers with written notification on the same day wherever possible. Written notification will include: pupil name; date, time, and duration of the intervention; location; type/technique used; reason for use; staff involved; any injuries and immediate treatment; and planned follow-up actions (including changes to the PBSP or risk assessment). If same-day written notification is not possible, the school will telephone parents/carers on the same day and send written confirmation the next working day. A copy of the notification is retained on the pupil's file and logged on LearnTrek.

Absconding – Procedure

If a pupil absconds, staff must:

1. Remain calm – do not chase.
2. Maintain visual contact where safe.
3. Ensure other pupils remain supervised.
4. Inform DSL/Deputy DSL immediately.
5. After 15 minutes (or sooner if risk dictates): contact parents/carers.
6. If pupil's whereabouts unknown within 30 minutes (or sooner if risk identified): call police.

DSL/Deputy DSL must:

- Keep an open phone line with staff
- Inform parent/ Guardian.
- Update risk assessments.
- Record incident on LearnTrek
- Share incident at staff meeting.

Post-incident debrief for pupil and staff ensures lessons are learned and emotional wellbeing supported.

If necessary, request police assistance, giving:

- Pupil's name, age, and description
- Last known location/time
- Any known risks (SEND, medical, safeguarding concerns)
- The height and build of the pupil
- The colour of the pupil's hair.
- What the pupil was wearing, including any distinguishing accessories, i.e bags, sunglasses, hats etc.

Decide whether additional staff are needed to safely retrieve the pupil, record the incident on LearnTrek and notify relevant agencies if appropriate.

After the incident:

- DSL reviews and updates the pupil's **risk assessment**.
- Pupil has a **restorative meeting** to discuss risks and consequences.
- Incident is logged and shared at staff meeting to ensure all staff are aware.
- Procedures are **reviewed half-termly** for pupils with repeated absconding behaviour.

Off-site trips:

- Trip leader follows the same procedure: do not chase, maintain visual contact, contact DSL immediately.
- DSL contacts parents and, if required, the police.
- A written incident report must be completed on return.

The DSL / Deputy DSL will ensure that the school informs the pupils parents / carers and records details as communicated by the trip leader on an incident form. A record of the telephone call to parents must be made. The trip leader must provide the following information when calling the school office to report a pupil absconding:

- The precise location.
- Who the absconding pupil was with.

- When the pupil was last recorded as being seen.
- How the pupil absconded.
- The time that the pupil absconded.
- Are they in any immediate danger (if so the police/fire/ambulance service must be called)

All incidents are reported immediately to the DSL/Deputy DSL, recorded on LearnTrek, and reviewed through risk assessment.

Rewards

We promote positive behaviour by recognising effort, achievement, and progress daily. Rewards may include:

- Verbal praise and positive acknowledgement
 - Written feedback in books or portfolios
 - Postcards/calls home
 - Certificates or public recognition (class/assembly)
 - Sharing good work with senior staff
 - Additional activities or privileges
 - Vouchers, tokens, or pre-agreed incentives with parents/carers
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Training & Awareness

- This policy is shared via the school website, staff handbook, induction programme, staff meetings, and displays throughout school.
- Training and competence: All staff authorised to use restrictive interventions must complete approved physical intervention and de-escalation training (PRIME) on appointment and receive annual refresher training. Attendance alone is not sufficient: the Head of Centre will record a competency check for each staff member (observation or assessed practical demonstration) and retain these records. Training records will show provider, content, dates, and evidence of competence and will be available for inspection.
- All staff also receive regular training in SEND awareness, de-escalation, restorative practice, and safeguarding updates. Pupil and parent awareness is maintained through assemblies, surveys, and workshops.
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Monitoring & Recording

Behaviour is tracked daily via star charts and formally logged on LearnTrek for serious incidents. Patterns are analysed to inform interventions and measure impact. Parents are involved at the earliest opportunity to support positive change and are always informed where physical aggression, or bullying has occurred.

Governance and Monitoring

The Head of Centre will provide the proprietor, School Improvement Partner, and a named governor with a termly anonymised report that includes: the number of restrictive interventions and seclusions (term and cumulative); anonymised pupil identifiers and frequency of use; contexts in which interventions occurred (lessons, trips, transport); evidence that same-day parental notifications were made (or, where not possible, that same-day telephone contact and next-working-day written confirmation were provided); training compliance for all staff authorised to use restrictive interventions; and actions taken to reduce restrictive practice over time. The named governor/proprietor will review this report termly and confirm the actions implemented.

DSL Cover, Low-Level Concerns and Information Sharing

TILT Education follows Keeping Children Safe in Education (KCSIE 2025). The school has robust DSL cover arrangements, including a confidential shared mailbox and a named deputy DSL available whenever the DSL is absent. The school maintains a low-level concerns process for staff, enabling concerns about any adult's conduct to be recorded and reviewed in line with KCSIE (2026). Information will be shared with statutory partners in accordance with KCSIE (2026) and the Data (Use and Access) Act 2025 where doing so is necessary to safeguard children.

Annexe A — LearnTrek Minimum Incident Fields

For every restrictive intervention or seclusion incident, the following fields must be completed on LearnTrek on the same day:

- Pupil name, date of birth, and year group.
- Date, start time, and end time of the intervention.
- Location of the incident.
- Type of intervention (physical restraint, seclusion, escort, etc.).
- Detailed factual account of events leading to the intervention (who said/did what).

- The identified risk that justified the intervention and why less restrictive options were insufficient.
- Names and roles of all staff involved and names of any witnesses.
- Any injuries to the pupil or staff and the treatment provided.
- Pupil presentation before, during, and after the intervention (mood, medication, triggers).
- Welfare-check timestamps (minimum every 10 minutes during seclusion).
- Parental notification: method used, date and time of contact, and name of the staff member who made contact.
- Links to the pupil's PBSP, EHCP (if applicable), or previous risk assessments.
- DSL/Head of Centre reviewer name, date of review, and actions arising.

Retention: incident records will be retained on the pupil file while the pupil is on roll and for a minimum of seven years after they leave (or as advised by the proprietor or legal advisor). Termly anonymised summaries will be produced for proprietorial and governance oversight.

Annexe C — Inspector Checklist (Quick Reference)

Inspectors may ask to verify: (1) whether LearnTrek incident fields are complete and contain all minimum data required by the 2025 Regulations; (2) whether same-day written parental notification was made, or if not, whether a same-day telephone call and next-working-day written confirmation are evidenced; (3) whether a current PBSP is in place and contains evidence that SEND adjustments were considered before any sanction or restrictive intervention was applied; (4) whether direct continuous observation (not CCTV alone) was used during any seclusion; and (5) whether termly anonymised governance reports on restrictive interventions have been produced and reviewed by the proprietor.