

Reviewed: September 2017

Physical Intervention/Use of Force Policy

1. Aims

1.1 Everyone has the right to be protected from harm within the Northumberland Pupil Referral Unit. The PRU seeks to protect all students and staff within the PRU against any form of physical intervention which is inappropriate, excessive or unlawful.

1.2 It is acknowledged that staff working on a day to day basis with students, may have to deal with challenging behaviour and will need assistance in preserving order, maintaining positive relationships and in promoting and maintaining an environment conducive to the education of students. At the same time, it is important that staff try to both protect themselves and minimise the risk of injury to staff or student in the use of any necessary control or physical intervention. These are a matter of professional judgement. The use of physical force as a last resort should be seen as only one element of the PRU's overarching Behaviour Policy. Staff should be clear about the appropriateness of their actions and should notify the Headteacher or a member of the Senior Leadership Team in his absence (telephone DSL if no SLT are available) of an intervention.

1.3 This policy has been drawn up with the aim of promoting good practice based on maintaining good relationships in a positive environment with appropriate support being provided.

The aims of this policy are to:

- Explain staff right to use physical intervention when necessary;
- Explain the circumstances in which physical intervention may be justified;
- Set out the recording and reporting system; and
- Explain the various responsibilities.

1.4 Account has been taken of DfE guidance "Use of Reasonable Force".

2. Powers of members of staff to detain students by use of force

2.1 The Education and Inspections Act 2006 - Section 550A allows teachers, and other persons who are authorised by the Headteacher to have control or charge of students to use such force as is reasonable in all the circumstances to prevent a student from doing, or continuing to do, any of the following:

- Committing a criminal offence (including behaving in a way that would be an offence if the student were not under the age of criminal responsibility);
- Injuring themselves or others;

- Causing damage to property (including the student's own property)
- Engaging in any behaviour prejudicial to maintaining good order and discipline at the school or among any of its students, whether that behaviour occurs in a classroom during teaching sessions or elsewhere.

The provision applies when a teacher, or other authorised person, is on the school premises, and when he/she has lawful control or charge of the student concerned elsewhere, e.g. on a field trip or other authorised off-site activity. This document gives detailed guidance on alternatives to physical intervention. However, recognising that these may not always be successful in averting dangerous situations, it discusses acceptable forms of intervention. The objective must be clear: to prevent further risk or injury to any individual. Any physical response must be used only where essential and in proportion to an immediate and significant risk.

2.2 However, nothing in the law concerning the use of reasonable force legitimises corporal punishment.

3 Circumstances where physical intervention may be justified

3.1 Physical intervention should only be used as a last resort; other non-physical strategies for diffusing the situation must be tried first. Some forms of physical intervention may constitute an offence under either criminal or civil law if inappropriately handled. However, such action will be permissible if it is reasonable and commensurate with the circumstances. Each case can only be considered on its individual circumstances. Critical features can include:

- Was there a clear perceived risk of injury to self or others or of damage to property;
- Were alternatives and the students' understanding considered before action was taken;
- Was the force used commensurate with the risk presented;
- Was the student restrained for the shortest possible time until calm;
- Was the physical intervention only used to prevent further injury or harm;
- Was the incident recorded?

An assessment of the risk at the workplace using these guidelines will also provide valuable evidence of consideration by staff of steps which will help minimise the use of physical intervention and planned steps to be taken in future incidents should physical intervention become unavoidable. This will demonstrate the reasonableness of action taken by staff.

Support to Staff: Where a member of staff follows the guidance, acting appropriately to the circumstances, and either has been assaulted (either before or while restraining a person) or the person has raised a complaint about the physical intervention, whether to the PRU or perhaps to the police, the PRU will provide appropriate support to that staff member. This will include gathering information, reviewing the future provision of services to the student, assisting with the provision of legal advice and providing continued management support.

3.2 Whenever possible, the age, level of understanding and gender of the student should be considered. In addition staff should be mindful of any student who is on the Child Protection Register.

3.3 The PRU appreciate that in some instances (such as stopping a student who is running down a corridor) staff may have to act quickly, and without having the time to consider all the

circumstances. In these circumstances the PRU will support the member of staff's actions, provided that they are in accordance with the principles set out in section 2.

4 Permissible forms of control

4.1 Use of physical force should be rare. Behaviour Policies should be designed to ensure that early and preventive intervention is the norm, so reducing the incidents of extreme behaviour requiring the use of physical force. Physical intervention should only be used when required by the particular circumstances prevailing, never as part of a general regime and always as a last resort. It must never be used in anger.

4.2 When force is necessary, it must be used in ways that maintain the safety and dignity of all concerned.

4.3 The method of intervention used must always be appropriate to the circumstances taking into account the age, competence and nature of the student and the potential risks involved. Staff should only use techniques for using physical force on students with which they are familiar and confident and which are consistent with these guidelines.

4.4 The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled, and the nature of the harm they might cause. These judgements have to be made at the time, taking due account of all the circumstances, including any known history of other events involving the individual to be controlled. The minimum necessary force must be used and good practice should always be concerned with assessing and minimising risk to students and staff.

4.5 Any intervention should always be preceded by clear verbal instructions and statements relating to the consequences of ignoring them and then accompanied throughout by attempts to "talk down" and calm the incident until any risk has passed.

4.6 Failure to secure compliance with one form of intervention should not automatically signal more forceful intervention. The understanding of the student should always be taken into account.

5 Leaving the school site

5.1 In cases of young student or students for whom the potential dangers of leaving the site are "real and obvious", action should be taken to prevent this by means of (in order of preferred use):

- a)** Clear verbal instructions and warning of consequences; or
- b)** Close supervision until the danger is judged to have receded; or
- c)** A permitted form of physical action (obstructing, holding or physical intervention)

5.2 In the case of students whose departure from the site is judged unlikely to lead to injury or serious damage, physical intervention is inappropriate. Clear verbal instructions, statements referring to consequences should be given – pupils will be informed that the police will be notified.

5.3 "Gating" (i.e. not allowing an individual to leave the site) is acceptable but not if it involves locking in or physical intervention or is for any unreasonable length of time or amounts to a restriction on visits or contact as prohibited in paragraph 9.2 below.

5.4 Where a student has absconded/left the school site and is clearly at risk due to the proximity of the main road, PRU staff will not pursue but will observe, monitor and inform the relevant emergency services.

6. Holding and guiding (to discourage unwanted behaviours)

6.1 For the purpose of this document “holding and guiding” is distinguished from “physical intervention” by the former being seen as a strategy for discouraging unwanted behaviour and the latter as a means of preventing such behaviour. Holding may also be seen in the context of caring for certain groups providing a sense of security and offering comfort in distress. For some groups, physical contact offers therapeutic benefits. In all cases, the utmost care must always be taken to avoid giving cultural offence or apprehension of harm or arousing sexual expectations or feelings.

6.2 Holding and guiding would generally involve no more than a hand being placed on an arm or shoulder, gentle holding of hand or arm, the placing of an arm around the student’s shoulder or the flat of a hand being placed against a student’s back in order to guide him/her to some other place or activity.

6.3 Holding and guiding would be used as a means of:

- a) Avoiding external danger (e.g. holding a hand while crossing the road);
- b) Diverting a student from potentially destructive or disruptive behaviour.

6.4 Recording “holding and guiding” – to be made in the Pupil Record Book under the Physical Intervention/Touch section.

7. Permissible forms of physical intervention

7.1 Physical intervention

7.1.1 “Physical intervention” is here defined as the positive application of force with the intention of preventing a student from harming himself/herself or others, or from causing serious damage to property.

7.1.2 Intervention must always be reasonable and proportionate and as a last resort. It requires skill and judgement plus the knowledge of non-harmful methods of physical intervention that avoid hypertension (psychological stress), hyperflexion (Flexion of a limb or part beyond the normal limit). The onus is on the member of staff to determine the degree of physical intervention appropriate and when it should be used. The techniques should not impede breathing, inflict pain and avoid vulnerable parts of the body.

7.1.3 Care must be taken not to over-react.

7.1.4 It is important that staff who may be called upon to use this form of intervention have received guidance (induction) in non-harmful methods of physical intervention which should only be used in appropriate circumstances, when other forms of control have been tried and have failed.

7.1.5 It is not, and never should be, a punitive measure and never used simply to secure compliance with staff instructions. Staff should be aware that for some students, physical

intervention may act as a positive reinforcement of their inappropriate behaviour and be used to justify their own physical escalation of a situation.

7.1.6 Staff may be perceived as powerful figures because they are adults, because of their position etc. Staff have to be aware of and sensitive to the effects of actions which may be interpreted quite differently as they affect race, age, gender, disability etc. Actions such as straddling may be open to misinterpretation and abuse and such action must be justifiable as the most effective way to reduce risk and bring the situation under control.

7.1.7 Whenever possible, call for assistance before engaging in physical intervention. Having a second person present is a safeguard both as a witness and to assist if it is obvious that two people will effectively restrain better than one.

7.1.8 If other students are present when physical intervention may become necessary, consider what action may be appropriate both to lessen their anxiety and to reduce the likelihood of others exacerbating the situation.

7.1.9 Physical intervention must not involve deliberately painful or dangerous procedures. In exerting physical intervention staff must:

- a) Avoid interference with breathing, blood supply, breasts or genital areas (especially when the person applying the physical intervention is of a different gender);
- b) Avoid holding neck, throat or fingers; if limbs have to be grasped avoid twisting or pulling movements. Hold firmly and do not dig fingers in. Avoid the areas around the joints which are vulnerable to forceful pressure for certain client groups, e.g. pre-teen student and the elderly.

7.1.10 Whenever possible the student should not be lowered to the floor as this increases the possibility of the student and staff being injured. Do not use your body weight inappropriately, e.g. by sitting or kneeling on the person.

7.1.11 Staff should also take care to avoid injury to themselves. Where possible, articles of clothing/jewellery which increase the likelihood of such injury such as necklaces, ties or earrings should not be worn and it is wise to remove spectacles, if circumstances permit.

7.1.12 If physical intervention becomes a significant feature of control in a particular class, the Headteacher or other senior member of staff responsible should examine the operational reasons for this and take appropriate steps to remedy the situation. It is essential to prevent the development of a culture where physical response becomes routine.

8.2 Types of incidents requiring control/Physical intervention

8.2.1 There are a wide variety of situations in which control/physical intervention exercised with reasonable force might be appropriate or necessary; these fall into three broad categories:

- a) Where action is necessary in self-defence or because there is an imminent risk of injury;
- b) Where there is a developing risk of injury, or significant damage to property;
- c) Where a student is behaving in a way that is compromising good order and discipline if all other strategies have been exhausted.

8.2.2 Examples of situations that fall within one of the first two categories are:

- A student attacks a member of staff, or another student;
- Students are fighting;
- A student is engaged in, or is on the verge of committing, deliberate damage or vandalism to property;
- A student is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials or objects;
- A student is running in a corridor or on a stairway in a way in which he or she might have or cause an accident likely to injure him or herself or others;
- A student absconds from a class or tries to leave school (NB this will only apply if a student could be at risk if not kept in the classroom or at school).

8.2.3 Examples of situations that fall into the third category are:

- A student persistently refuses to obey a request to leave a classroom;
- A student is behaving in a way that is seriously disrupting a lesson.

8.3 Reasonable force

8.3.1 There is no legal definition of “reasonable force”. So it is not possible to set out comprehensively when it is reasonable to use force, or the degree of force that may reasonably be used. It will always depend on all the circumstances of the case.

8.3.2 There are two relevant considerations:

- The use of force can be regarded as reasonable only if the circumstances of the particular incident warrant it. The use of any degree of force is unlawful if the particular circumstances do not warrant the use of physical force. Therefore physical force could not be justified to prevent a student from committing a trivial misdemeanour, or in a situation that clearly could be resolved without force.
- The degree of force employed must be in proportion to the circumstances of the incident and the seriousness of the behaviour or the consequences it is intended to prevent. Any force used should always be the minimum needed to achieve the desired result.

8.3.3 Whether it is reasonable to use force, and the degree of force that could reasonably be employed is likely to depend on the age, understanding, and sex of the student.

8.4. Practical considerations

8.4.1 Before intervening physically staff should, wherever practicable, tell the student who is misbehaving to stop, and what will happen if he or she does not. Staff should continue attempting to communicate with the student throughout the incident, and should make it clear that physical contact or physical intervention will stop as soon as it ceases to be necessary. A calm and measured approach to a situation is needed and staff should never give the impression that they have lost their temper, or are acting out of anger or frustration, or to punish the student.

8.4.2 Sometimes staff should not intervene in an incident without help (unless it is an emergency). For example, when dealing with an older student, or a physically large student, or more than one

student, or if staff believe he or she may be at risk of injury. In those circumstances staff should remove other students who might be at risk, and summon assistance from a colleague or colleagues, or where necessary telephone the Police. Staff should inform the student(s) that he or she has sent for help. Until assistance arrives staff should continue to attempt to defuse the situation orally and try to prevent the incident from escalating.

8.5 Action in self-defence or in an emergency

Section 550A does not cover all the situations in which it might be reasonable for someone to use a degree of force. For example, everyone has the right to defend themselves against an attack provided they do not use a disproportionate degree of force to do so. Similarly, in an emergency, for example if a student was at immediate risk of injury or on the point of inflicting injury on someone else, any member of staff would be entitled to intervene. The purpose of Section 550A is to make it clear that teachers, and other authorised staff, are also entitled to intervene in other, less extreme situations.

8.6 Application of force

8.6.1 Physical intervention can take several forms. It might involve staff:

- Physically interposing between students;
- Blocking a student's path;
- Leading a student by the hand or the arm;
- Shepherding a student away by placing a hand in the centre of the back; or,
- (In extreme circumstances) using more restrictive hold.

8.6.2 In exceptional circumstances, where there is an immediate risk of injury, a member of staff may need to take any necessary action that is consistent with the concept of "reasonable force": for example, to prevent a young student running off a pavement onto a busy road, or to prevent a student hitting someone, or throwing something.

8.6.3 In all other circumstances staff should not act in a way that might reasonably be expected to cause injury, for example by:

- Holding a student around the neck, or by the collar, or in any other way that might restrict the student's ability to breathe;
- Slapping, punching or kicking a student;
- Twisting or forcing limbs against a joint;
- Tripping up a student;
- Holding or pulling a student by the hair or ear;
- Holding a student face down on the ground.
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8.6.4 Staff should always avoid touching or holding a student in a way that might be considered indecent.

8.6.5 Where the risk is not so urgent, staff should consider carefully whether, and if so when, physical intervention is right. Staff should always try to deal with a situation through other strategies before using force. All staff need developed strategies and techniques for dealing with

difficult students and situations which they should use to defuse and calm a situation. In a non-urgent situation force should only be used when other methods have failed.

8.6.6 The same consideration is particularly appropriate in situations where the aim is to maintain good order and discipline, and there is no direct risk to people or property. As the key issue is establishing good order, any action which could exacerbate the situation needs to be avoided. The possible consequences of intervening physically, including the risk of increasing the disruption or actually provoking an attack, need to be carefully evaluated.

8.6.7 The age and level of understanding of the students is also very relevant in those circumstances. Physical intervention to enforce compliance with staff instructions is likely to be increasingly inappropriate with older students. It should never be used as a substitute for good behavioural management.

9 Prohibited forms of physical intervention

9.1 Corporal punishment (or threat of it)

The law forbids a teacher to use any degree of physical contact which is deliberately intended to punish a student, or which is primarily intended to cause pain or injury or humiliation (Sections 548 to 550 of the 1996 Act).

Any act, or threat of an act, such as hitting, kicking, slapping, punching, poking, prodding, biting, throwing an object, rough handling etc. which causes or threatens harm or the expectation of harm to a student is strictly forbidden and constitutes gross misconduct. Staff indulging in such behaviour render themselves liable to dismissal and the possibility of prosecution.

9.2 Restriction of liberty by confinement

9.2.1 There is electronic access to all exterior doors and most interior doors at Northumberland PRU; these are operated by key fobs. Each fob is programmed to allow access to all rooms. These not only safeguard pupils and staff from unwelcome visitors but also act as a deterrent to absconding.

The unit is not a secure unit and will not attempt to lock pupils in unless there are extraordinary circumstances; the doors do however keep pupils in the unit whilst staff assess their emotional state and the risk they may present to themselves and others should they leave the room/site. If staff consider pupils are at high risk, pupils will be maintained within the building and parents will be informed and/or police will be called and asked to attend. Should pupils to be assessed as low risk parents will be called and informed their child wishes to leave the site; further information will be sought that may inform risk assessment and management. If parents agree that the child is not at risk they will be asked to make the decision as to whether the pupil be allowed to leave the site. Whilst the locking of doors may be contentious it is only used as a first line defence and is not in any way intended to restrict liberty. Pupils will be prevented from accessing any rooms/areas or site where their presence may meet the criteria in Section 2.1.

9.2.2 Where there is an immediate risk of danger, either to the individual concerned, or to others or danger of serious damage to property, an individual may be restricted to a building or part of a building until the immediate difficulty has passed. This must not involve prolonged, physical

intervention. In normal circumstances this should not exceed 45 minutes; however, there may be exceptional circumstances for extending this.

9.2.3 For consideration of acceptable forms of restriction to a particular site, including “gating”, see 5.4 above.

10 Staff Code of Conduct

10.1 PRU Staff are expected to:

- Be aware that even well intentioned physical contact may be misconstrued by the student, an observer or by anyone to whom this action is described;
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny;
- Be aware of the government guidance in respect of physical contact with students and meeting medical needs of students; and
- Ensure that all incidents are reported and logged in Pupil Record Books and Physical Intervention Forms.

10.2 Staff may legitimately intervene using physical intervention to prevent:

- A student from committing a criminal offence;
- Injury to themselves or others;
- Damage to property;
- Any behaviour which might be prejudicial to good order; and
- To maintain good order and discipline.

10.3 Staff should have regard to the health and safety of themselves and others.

10.4 In all cases where physical intervention is deemed necessary, the incident and subsequent actions should be documented and reported.

10.5 Under no circumstances should physical force be used as a form of punishment.

10.6 The use of unwarranted physical force is likely to constitute a criminal offence.

10.7 Staff must:

- Adhere to this physical intervention policy
- Always seek to defuse situations
- Always use minimum force for the shortest period necessary.

11 Training and support

The Headteacher will ensure that appropriate training is provided for key staff annually and for all staff at least every two years.

The Headteacher will ensure that the system enables account to be taken of the records in the Incident log and elsewhere.

12 Equal Opportunities

In implementing this policy all staff must take account of the PRU's Equal Opportunities Policies.

In particular, the Headteacher and staff will take account of any disabilities or special educational needs of students before using physical intervention.

13 Responsibilities

13.1 The Pupil Referral Unit is responsible for making and reviewing the policy.

13.2 The Headteacher is responsible for:

- The implementation of the policy in the PRU;
- Organising an appropriate reporting and recording system;
- Arranging appropriate training; and
- Making the policy known to staff.

13.3 All staff have a duty to know the policy and to ensure that it is implemented.

14 Monitoring and Review

14.1 The Headteacher will:

- Ensure that a recording and reporting system is in place and is maintained;
- Ensure that a senior member of staff is in charge of the Incident Log (see Appendix 2) and reports regularly to the Headteacher.
- Report incidents and the outcome to the Management Committee.

14.2 PRU will review the policy every two years.

14.3 Complaints will be dealt with in accordance with the PRU Complaints Policy.

Appendix 1

CHECKLIST OF “DOs and DON'Ts”

DO

1. Whenever possible, take time and advice before acting.
2. Attempt to clear the space of unwanted bystanders.
3. Always remember the person's history and previous experiences.
4. Involve the appropriate numbers and members of staff.
5. Be aware of the existing relationship between the student and you as a member of staff.
6. Remember at all times to show respect to the student and to leave them a way out of the situation with dignity.
7. Communicate clearly what you are doing and why.
8. Maintain as calm an atmosphere as possible throughout.
9. Hold clothing if possible and appropriate and hold clothing near joints rather than at the end of limbs.
10. Let go carefully as soon as it is safe to do so.
11. Check that the student is under control.
12. Tell the Headteacher or senior member of staff (or colleague in their absence) and record what has happened.

DON'T

1. Act under the influence of your own anger.
2. Be afraid to back down.
3. Use sarcasm to gain control.
4. Talk if it aggravates the situation.
5. Initiate physical intervention unless you believe it is safe to do so.
6. Make a threat you are not able, willing, and capable of carrying out.
7. Use techniques designed to cause pain.
8. Restrain in a way which could be viewed in any way as sexually or culturally offensive.
9. Restrict the person's breathing or blood supply.
10. Force the person to lose face.
11. Let your actions reinforce racial, sexual or other stereotypes.
12. Release in an unplanned way.
13. Think it is over when you let go.

Appendix 2

Recording Physical Interventions on CPOMS

Checklist

1. Staff to send a communication to TD/SI informing them of PI (only check the communication box) as soon as possible after the incident but must be done before staff leave the school site. The incident must be written up within 24 hours of the PI.
2. Create an incident/write statement of events to include the following information:
 - a. Place/area in the school where PI occurred
 - b. Full names of staff involved in PI or witness to it
 - c. The antecedent, any de-escalation and description of the hold(s) used, explaining why you used them
 - d. Resistance and/or complaints made (alert SLT)
 - e. Duration of the physical intervention
 - f. Details of any injury (alert KA), first aid, damage caused – use body map to show location of any injuries
3. Check category boxes – behaviour, bullying (if involved), risk assessment (if need to update) and physical intervention. There will also be sub-categories for the reason for PI:
 - a. Disruption
 - b. Damage to property
 - c. Risk of injury/harm to self
 - d. Risk of injury/harm to others
 - e. Other reason – describe in the statement
4. Name the linked students involved with PI.
5. Drop down Body Map and indicate where injuries (if any) are noted
6. Add the date and time of the PI – not the time writing up the statement.
7. Alerting staff:
 - a. SI – automatic
 - b. KA – complaints, injuries (must be done before child leaves school site)
 - c. RG – automatic if bullying involved
 - d. Other staff members involved in PI or witness to it – please write on the statement '*staff name* – please verify the statement'. Staff need to respond by adding an action and stating 'statement verified'
8. Further communications can be added later (parents must be called on the day of the PI) but should be linked as an action to the original incident.
9. Statement/incident must be written up within 24 hours of the PI – add it as an action to the communication to alert TD/SI.
10. SI will check that the statement/incident is logged and that staff involved/witness have verified the statement within the following 24 hours. SI to check the level of PI category:
 - a. 0 – gating/holding & guiding/lead away with compliance
 - b. 1 – lead away with some resistance
 - c. 2 – physical restraint under 2 minutes duration
 - d. 3 – physical restraint under 15 minutes duration
 - e. 4 – sustained physical restraint over 15 minutes duration and police called
11. SI will then request that SLT sign off the statement within the following 24 hours – they will respond by writing 'statement read – no further action'.

APPENDIX 3

ADDITIONAL ADVICE TO COLLEAGUES WHO ARE DEALING WITH STUDENTS IN CRITICAL SITUATIONS

1. Distractions/diffusion and distraction in potentially dangerous situations

- 1.1. Use of voice- keep your voice calm and quiet, speak slowly- the student is likely to respond to the pitch, tone and volume of your voice, positively if you are calm and negatively if you show aggression or anxiety.
- 1.2. Attempt to keep communication channels open by talking to the student with sensitive use of eye contact, offering choices and time for the situation to de-escalate.
- 1.3. Humour can sometimes be used effectively to avoid the need for physical intervention- be careful to avoid sarcasm.
- 1.4. In order to appear natural and avoid any risk of provocation, keep and confident natural body stance and maintain a critical distance, for as long as possible. Try to avoid being directly face to face or adopting other body language that may be interpreted as aggressive.
- 1.5. Be appropriately assertive- directions/requests to students should be communicated confidently and with a clear expectation that the student will comply.
- 1.6. Avoid power struggles- this is likely to increase anxiety and cause future problems for students and staff. It can remind students of their helplessness. Create resentment and place staff members in the role of opponent.
- 1.7. Try to reduce tensions by talking to students individually in one to one situations.
- 1.8. Be aware of yourself; try to make time to consider your mood and how it may affect your objectivity and tolerance.
- 1.9. Counter any aggressive advances by students by withdrawal out of critical distance as this may often defuse the situation.
- 1.10. A member of staff who knows the student well is likely to have to resort to physical intervention.

2. Physical prompting (to encourage an action/ behaviour by physical means)

- 2.1. Prompting means physical contact to encourage or motivate a reluctant person to comply with requests and to follow routines. For example, a flat hand placed gently on an individual's back whilst moving forward; placing an arm on a shoulder in conjunction with verbal encouragement; extending a hand; giving an opportunity to link arms; leading by holding hand or arm around shoulder.
- 2.2. Prompting may be used to help a student to carry out desired action, for example in the performance of a task or activity. It may also be used to guide a person towards a desired behaviour, for example as an accompaniment to verbal instruction such as "hands down" or "look at me". It should always be persuasive rather than coercive and great care must be taken to ensure that the physical contact involved does not give cultural offence or apprehension of harm, or arouse sexual expectations or feelings. Only the required degree of physical contact must be used. It may help to talk to the student about it on a non- interventionist occasion.
- 2.3. Staff may use physical prompts when promoting participation and aiding learning in physical and practical activities, subject to the precautions.
- 2.4. In situations where a person is in distress or in need of reassurance a member of staff may, dependent upon the circumstances and in the light of his/her knowledge of the person concerned, offer comfort through physical contact. The nature of such contact, its duration and

the degree of intimacy involved must again be finely judged to avoid offence, apprehension of harm or the arousal of sexual expectations or feelings. Members of staff must always be aware that they could be vulnerable to accusations of inappropriate physical contact and should remember that they are afforded a degree of protection against unfounded accusations by the presence wherever possible of a witness and by avoiding places to which there is no open access (i.e. behind closed doors or in remote situations). Refer to PRU Touch Policy.

3. Withholding extra privileges

3.1 Extra privileges should be granted considerately and may be withheld as an easy way to enforce control, e.g. restricting outings.