



# VTC

# BEHAVIOUR POLICY

Including VTC Behaviour Principles

|                     |                                        |                      |
|---------------------|----------------------------------------|----------------------|
| Approved by:        | The Proprietor &<br>The Advisory Board | Date: September 2026 |
| Last reviewed on:   | September 2026                         |                      |
| Next review due by: | September 2027                         |                      |

## Contents

| Section           | Title                                                                         |
|-------------------|-------------------------------------------------------------------------------|
| 1                 | Purpose and scope                                                             |
| 2                 | VTC approach and aims                                                         |
| 3                 | Legal and regulatory framework                                                |
| 4                 | Definitions and behaviour categories                                          |
| 5                 | Roles and responsibilities                                                    |
| 6                 | Learner expectations and behaviour curriculum                                 |
| 7                 | Positive behaviour support, rewards and consequences                          |
| 8                 | SEND, disability, mental health and reasonable adjustments                    |
| 9                 | Bullying, prejudice and discrimination                                        |
| 10                | Child-on-child abuse, harmful sexual behaviour and sexual harassment/violence |
| 11                | Mobile phones and smart technology                                            |
| 12                | Searching, confiscation and banned items                                      |
| 13                | Removal from classrooms and supervised spaces                                 |
| 14                | Restrictive interventions, reasonable force, seclusion and restraint          |
| 15                | Safeguarding, serious incidents and suspected criminal behaviour              |
| 16                | Off-site and online behaviour                                                 |
| 17                | Exclusion, termination of placement and reintegration                         |
| 18                | Recording, monitoring and use of data                                         |
| 19                | Training and staff support                                                    |
| 20                | Transition and information sharing                                            |
| 21                | Communication, complaints and policy availability                             |
| 22                | Monitoring and review                                                         |
| <b>Appendix A</b> | VTC Behaviour Principles                                                      |
| <b>Appendix B</b> | Serious behaviour / serious sanction record requirements                      |
| <b>Appendix C</b> | Restrictive intervention record requirements                                  |

In this policy, “learner” is VTC’s preferred term. Legislation and statutory guidance may use “pupil”. “Parent” includes carers and others with parental responsibility where the relevant legal framework uses that meaning.

## 1. Purpose and scope

This policy sets out how VTC promotes positive behaviour, maintains a calm and safe learning environment, responds to behaviour that does not meet expectations, and supports learners whose behaviour may communicate an unmet need or safeguarding concern.

It applies to all registered learners at VTC, including learners above compulsory school age, and to all staff, volunteers and adults working on behalf of the school. It applies during the school day, on school premises, on school-organised activities and trips, during work-related learning or community activities, and to off-site or online behaviour where the school is entitled to respond.

The policy should be read alongside individual Education, Health and Care (EHC) plans, risk assessments, behaviour support plans, safeguarding plans and any agreed reasonable adjustments. Individual plans guide staff practice but do not remove the school’s legal duties or the need for staff to make dynamic, proportionate decisions in the circumstances.

## 2. VTC approach and aims

VTC is a specialist SEMH setting. Our behaviour approach is based on the principle that behaviour can be communication, while also maintaining clear, age-appropriate expectations, boundaries and accountability. Positive behaviour support does not mean low expectations or an absence of consequences; it means using the least punitive and most effective response that helps the learner regulate, understand impact, repair relationships and re-engage with learning.

- Provide a consistent, predictable and relational approach across the school.
- Create a safe, supportive and non-judgemental environment in which learners can learn and staff can work safely.
- Understand underlying needs, triggers, communication differences, trauma, anxiety, sensory needs and other factors that may contribute to behaviour.
- Teach and model self-regulation, emotional literacy, respectful communication, problem-solving and preparation for adult life.
- Use praise, recognition, restorative work and personalised support to strengthen positive behaviour.
- Apply consequences lawfully, fairly, consistently and proportionately, with reasonable adjustments where required.
- Identify safeguarding concerns promptly and ensure behaviour management never replaces a safeguarding response.
- Reduce the need for restrictive interventions through prevention, de-escalation, support planning and staff training.
- Use learner voice and parent/carers partnership to develop and review individual support.

## 3. Legal and regulatory framework

VTC is an independent school in England. The proprietor has ultimate responsibility for ensuring that the school meets the Independent School Standards (ISS) at all times. This policy has been structured around the requirements and guidance current in September 2026.

### 3.1 Core legal requirements

- **Education (Independent School Standards) Regulations 2014 (as amended):** including standards on safeguarding, behaviour, anti-bullying, supervision, restrictive-intervention procedures and provision of information to parents.

- **Equality Act 2010:** including protection from discrimination, harassment and victimisation and the duty to make reasonable adjustments for disabled learners.
- **Education and Inspections Act 2006, sections 93 and 93A:** reasonable force and recording/reporting of significant use-of-force incidents.
- **Education Act 1996, sections 550ZA-550ZC and related regulations:** powers relating to searching and prohibited items.
- **Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025:** recording and reporting duties in force from 1 April 2026.
- **Human Rights Act 1998 and health and safety law:** relevant to necessity, proportionality, dignity, safety and welfare.

### 3.2 Statutory and Department for Education guidance

- Keeping Children Safe in Education 2026 (KCSIE 2026).
- Mobile phones in schools - statutory guidance, to be followed from 1 September 2026.
- Restrictive interventions, including use of reasonable force, in schools - April 2026 (including statutory recording/reporting guidance under section 93A).
- SEND Code of Practice: 0 to 25 years, where applicable to the learner and placement.

### 3.3 Other guidance used by VTC

- Behaviour in schools: advice for headteachers and school staff (non-statutory but applicable to independent schools).
- Preventing and tackling bullying: advice for schools.
- Searching, screening and confiscation in schools, used alongside the school's legal powers and safeguarding duties.
- Mental health and behaviour in schools and other relevant DfE guidance.

#### Important independent-school point

The DfE statutory suspension and permanent exclusion framework applies to maintained schools, academies/free schools and pupil referral units; it does not directly govern independent schools. VTC therefore manages exclusion or termination of placement under its own published Exclusions Policy, contractual/placement arrangements, equality and safeguarding duties, and any requirements agreed with a placing local authority.

VTC will make the required particulars of its arrangements for behaviour, anti-bullying, admissions/misbehaviour/exclusions and relevant welfare provision available to parents and prospective parents in accordance with the ISS.

## 4. Definitions and behaviour categories

### 4.1 Behaviour that may require support or a consequence

Examples include, but are not limited to:

- Disruption to learning or repeated refusal to follow reasonable staff instructions.
- Unsafe movement around the school or leaving an agreed area without permission where this creates a safety concern.
- Non-completion of learning where this is not explained by an identified need, reasonable adjustment or agreed support plan.
- Disrespectful or abusive language, intimidation or threatening behaviour.
- Failure to follow agreed clothing, personal protective equipment or safety expectations, subject to reasonable adjustments and individual circumstances.
- Misuse of mobile phones, smart technology, social media or recording devices.
- Damage to property, theft, fighting or other unsafe behaviour.

## 4.2 Serious misbehaviour

Serious misbehaviour is behaviour that creates a significant risk of harm, serious disruption, criminal concern or serious impact on another person. It includes:

- Serious or repeated bullying, prejudice-based abuse, discriminatory harassment or targeted intimidation.
- Sexual violence, sexual harassment, harmful sexual behaviour or sharing nude/semi-nude content.
- Assault, serious threats, use or possession of a weapon, or behaviour creating a significant risk of injury.
- Possession, supply or serious misuse of illegal drugs or alcohol.
- Serious criminal damage, theft, arson or other suspected criminal conduct.
- Persistent behaviour that significantly compromises the safety, learning or welfare of others despite appropriate support and review.
- Any other incident judged by the Headteacher/SLT to meet the serious threshold based on the circumstances and risk.

All serious sanctions imposed for serious misbehaviour will be recorded. Where behaviour may also be a safeguarding concern, the safeguarding response takes priority and the DSL or deputy must be informed without delay.

## 5. Roles and responsibilities

### 5.1 The Proprietor

- Has ultimate legal responsibility for ensuring VTC meets the Independent School Standards and this policy is implemented effectively.
- Ensures that a written behaviour policy is maintained, sanctions for misbehaviour are clear, and serious sanctions are recorded.
- Ensures an effective anti-bullying strategy and compliant procedures for restrictive-intervention recording and parent reporting.
- Reviews assurance information and acts on patterns, disproportionality or implementation concerns.

### 5.2 Advisory Board

The Advisory Board supports the proprietor by reviewing the school's behaviour principles and policy, providing challenge and oversight, and monitoring implementation and impact. This support does not displace the proprietor's legal responsibility.

### 5.3 Headteacher and Senior Leadership Team

- Lead a calm, safe, consistent culture and ensure staff understand and apply the policy.
- Ensure sanctions, removals, searches, safeguarding responses and restrictive interventions are lawful, proportionate and properly recorded.
- Ensure staff training, induction, supervision and post-incident support are appropriate to VTC's SEMH context.
- Review behaviour data at least termly, including serious sanctions, removal, bullying, discrimination, searches and restrictive interventions.
- Ensure individual behaviour/risk plans are reviewed after significant incidents or evidence that support is not effective.
- Ensure the policy is available to parents and learners in accessible forms where needed.

### 5.4 Staff

- Model calm, respectful and professional behaviour and use agreed routines consistently.
- Know and implement relevant EHC plan provision, reasonable adjustments, behaviour support plans and risk assessments.

- Use prevention, co-regulation, de-escalation, redirection and restorative approaches before escalation where safe and appropriate.
- Record behaviour incidents accurately on SIMS. Where an incident includes a safeguarding concern or safeguarding information, record and refer it through CPOMS in line with the Child Protection and Safeguarding Policy. Complete any specific serious incident or restrictive-intervention records as applicable.
- Pass safeguarding concerns to the DSL or deputy without delay and never treat safeguarding solely as a behaviour matter.
- Seek support when a situation is escalating and participate in debrief, review and learning.

## **5.5 Learners**

Learners will be supported to understand the expectations in section 6, participate in restorative work where appropriate, communicate needs and triggers, and contribute to their individual plans. Expectations will be taught and adapted so they are accessible to each learner.

## **5.6 Parents and carers**

- Work with the school to support agreed expectations and individual plans.
- Share relevant changes in circumstances, health, medication, risk or wellbeing that may affect behaviour or support needs.
- Engage in reviews and post-incident discussions where appropriate.
- Raise concerns promptly through the school's normal communication and complaints arrangements.

# **6. Learner expectations and behaviour curriculum**

VTC teaches behaviour rather than assuming every learner already has the same skills. Staff use explicit teaching, modelling, reminders, practice, reflection and individual support. Learners are expected, with appropriate support and reasonable adjustments, to:

- Treat other learners, staff, visitors and members of the community with respect.
- Allow others to learn and work safely.
- Follow reasonable safety instructions, including workshop, catering, vehicle, PE and community-based safety rules.
- Remain in agreed areas and follow sign-in/out or movement arrangements.
- Use respectful language and challenge disagreement without intimidation, discrimination or abuse.
- Look after school property and the belongings of others.
- Follow VTC's mobile phone, online safety and smart technology expectations.
- Take increasing responsibility for choices, recognise impact and engage in repair/restorative work when ready.
- Behave safely and responsibly when representing VTC off site, travelling to/from school or participating in work-related learning.

Staff will avoid public confrontation wherever possible, use concise and accessible language, allow processing time, and offer regulated choices or an agreed exit strategy where this is part of a learner's plan.

# **7. Positive behaviour support, rewards and consequences**

## **7.1 Positive recognition**

Staff should place greater emphasis on noticing and strengthening positive behaviour than on repeatedly drawing attention to negative behaviour. Recognition may include:

- Specific verbal praise and positive feedback.
- Merit/recognition systems used by the school.

- Positive calls, messages, postcards or letters home.
- Responsibilities, privileges or leadership opportunities.
- Celebrating progress in regulation, attendance, engagement, independence and repair - not only academic outcomes.

## **7.2 Principles for consequences and sanctions**

- A consequence must be lawful, reasonable, proportionate and consistent with this policy.
- The learner's age, developmental level, SEND, disability, communication needs, trauma history, medical needs and any reasonable adjustments must be considered.
- A sanction must not be humiliating, degrading, discriminatory or used in place of support that the learner needs.
- Corporal punishment is never permitted. Force must never be used as punishment.
- Restorative work should occur when the learner is regulated enough to engage meaningfully; it must not be forced during crisis.
- A serious sanction for serious misbehaviour must be recorded in the school's serious sanction record.

## **7.3 Available responses**

Depending on the circumstances, VTC may use one or more of the following:

- Prompt, reminder, redirection, co-regulation, sensory break or agreed regulation strategy.
- Restorative conversation, reflection, repair of harm or a supported apology where appropriate.
- Completion of learning at another suitable time or in a different supervised space.
- Time-limited supervised removal from a learning environment where the section 13 criteria are met.
- Temporary restriction of a privilege where this is connected, reasonable and time limited.
- Parent/carers contact and joint review of support strategies.
- Targeted monitoring, mentoring, revised behaviour support plan or risk assessment.
- Confiscation of an item in accordance with section 12.
- Referral to SLT, DSL or external professionals depending on the nature of the concern.
- Exclusion/termination of placement under VTC's separate Exclusions Policy where the threshold is met and other relevant duties have been considered.

VTC does not use unrecorded "cooling-off" send-homes as a disciplinary measure. If a learner is required to leave the site for disciplinary reasons, the formal exclusion/placement procedure must be followed and the decision recorded.

## **8. SEND, disability, mental health and reasonable adjustments**

VTC has high expectations for all learners while recognising that behaviour may be affected by special educational needs, disability, communication differences, mental health, trauma, sensory processing or unmet provision. Staff must not assume that all behaviour is caused by SEND, but must consider whether there is an underlying need or a failure of current support.

- Make reasonable adjustments for disabled learners where a policy, rule or practice would otherwise place them at a substantial disadvantage.
- Use known learner information, EHC plans, annual reviews, professional advice, risk assessments and support plans to inform responses.
- Consider whether a sanction needs to be adjusted in form, timing or delivery so that it remains fair and effective.
- Review unmet need where behaviour is persistent or escalating, including communication, sensory, curriculum, health, attendance, safeguarding and environmental factors.
- Co-produce behaviour support and risk plans with the learner and parents where appropriate, involving relevant professionals and placing authorities.

- Review plans after significant incidents and when data suggests strategies are not reducing risk or increasing successful engagement.

Where a learner has an EHC plan and is publicly funded, VTC will provide information reasonably required by the responsible local authority for annual review and will work with the authority where a change in provision or placement may be needed.

## 9. Bullying, prejudice and discrimination

Bullying is usually repeated, intentional behaviour that hurts another person or group and involves a real or perceived imbalance of power. However, a one-off incident of harassment, abuse, discrimination, violence or harmful online behaviour may still be serious and will be addressed even if it does not meet the definition of bullying.

### 9.1 Forms of bullying and prejudice-related behaviour

| Type                    | Examples                                                                                                                                   | VTC response                                                                             |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| <b>Emotional/social</b> | Exclusion, humiliation, threats, coercion, rumour-spreading or deliberate isolation.                                                       | May occur in person or online.                                                           |
| <b>Physical</b>         | Hitting, kicking, pushing, taking belongings, damaging property or other physical intimidation.                                            | Any significant harm or weapon concern is treated as serious.                            |
| <b>Verbal</b>           | Name-calling, taunting, abusive comments, threats or persistent sarcasm.                                                                   | Context and impact are considered.                                                       |
| <b>Prejudice-based</b>  | Behaviour targeted at disability, race, religion/belief, sex, sexual orientation, gender reassignment or another protected characteristic. | Includes racist, sexist, homophobic, biphobic, transphobic and disability-related abuse. |
| <b>Sexual</b>           | Sexual comments, gestures, unwanted sexual attention or other sexualised behaviour.                                                        | May also be child-on-child abuse/HSB and requires safeguarding consideration.            |
| <b>Cyber/online</b>     | Bullying or harassment through messaging, social media, gaming, images, video or other digital platforms.                                  | Can be addressed where it affects learners or the school environment.                    |

VTC's anti-bullying strategy will include prevention, teaching learners how to report concerns, prompt investigation, support for the targeted learner, appropriate work with the learner responsible, parent communication where appropriate, and monitoring for recurrence. Bullying concerns with a safeguarding dimension are referred to the DSL.

## 10. Child-on-child abuse, harmful sexual behaviour and sexual harassment/violence

VTC adopts a zero-tolerance approach to child-on-child abuse: it is never dismissed as "banter", "just having a laugh", "part of growing up" or normal relationship behaviour. Child-on-child abuse can happen in school, outside school and online and can affect any learner.

- All staff must report child-on-child abuse concerns to the DSL or deputy in line with the Child Protection and Safeguarding Policy.
- The school will consider the safeguarding needs of the victim, the alleged perpetrator and other learners who may have witnessed or been affected by the incident.
- Sexual violence, sexual harassment and harmful sexual behaviour are safeguarding matters first. Behaviour consequences may be applied, but only as part of a coordinated safeguarding response.
- Risk assessment and safety planning will be completed where appropriate, including consideration of class/group arrangements, travel, shared spaces and online contact.
- The DSL will consider early help, children's social care and police referrals in accordance with KCSIE and local safeguarding procedures.
- Sharing nude or semi-nude images/videos, including AI-generated or digitally altered sexual imagery involving children, must be referred immediately to the DSL and handled under safeguarding procedures. Staff must not view, copy or forward imagery unless expressly permitted by safeguarding guidance.

### **10.1 False or malicious reports**

No learner will be sanctioned simply because an allegation is unsubstantiated, unfounded or not proven. If, after appropriate safeguarding consideration and investigation, a report is established to have been knowingly and deliberately false or malicious, the school may consider a proportionate behaviour response. The DSL will also consider whether the learner who made the report needs support or protection. The pastoral needs of any person wrongly accused will also be considered.

## **11. Mobile phones and smart technology**

VTC follows the statutory DfE guidance that schools should be mobile phone-free environments by default throughout the school day. This includes lessons, movement between lessons, breaks and lunchtimes, unless an authorised exception applies.

- Learners must not use mobile phones or other smart communication/recording technology during the school day unless authorised under an individual exception or a designated post-16 arrangement.
- Reasonable adjustments or individual exceptions may be agreed for disability, medical needs, safeguarding, caring responsibilities or another exceptional circumstance. The purpose, time and location of use should be clear.
- Unauthorised recording, photographing or sharing of other people is not permitted and may become a safeguarding, data protection or behaviour concern.
- Mobile phones and similar devices are identified as school-banned/searchable items when used or possessed contrary to this section. Any search or confiscation follows section 12.

## **12. Searching, confiscation and banned items**

### **12.1 Statutory prohibited items**

The statutory prohibited items include:

- Knives and weapons.
- Alcohol.
- Illegal drugs.
- Stolen items.
- Tobacco and cigarette papers.
- Fireworks.
- Pornographic images.
- Any article that has been or is likely to be used to commit an offence, cause personal injury, or damage property.

## 12.2 Additional VTC banned/searchable items

VTC also treats the following as banned or searchable under school rules where possession or use is contrary to school expectations:

- Vapes/e-cigarettes and other nicotine products.
- Laser pointers and aerosols where not required for an authorised curriculum purpose.
- Mobile phones, smart devices or recording technology used or possessed contrary to section 11.
- Any item reasonably assessed as harmful, unsafe or seriously detrimental to school discipline.

## 12.3 Search procedure

- Where practicable, staff will explain the reason for the search and seek the learner's cooperation first.
- Only the Headteacher or staff authorised by the Headteacher may exercise statutory search powers. Searches will be necessary, proportionate and sensitive to age, SEND, disability, trauma, safeguarding and dignity.
- A physical search of a learner will normally be conducted by a member of staff of the same sex and in the presence of another staff member, subject to any lawful urgent exception.
- School staff will not conduct a strip search. If a strip search is considered necessary, only the police may carry it out and safeguarding procedures must be followed.
- Reasonable force may only be used to search for legally prohibited items where the law permits; it must not be used to search for an item banned only under school rules.
- Searches and their outcomes will be recorded where required or where the circumstances are significant, and parents will be informed in accordance with law, guidance and safeguarding considerations.

## 12.4 Confiscation and disposal

Confiscated items will be retained, returned, handed to police/another agency, or disposed of in accordance with law and current DfE guidance. VTC will not operate a blanket rule that every prohibited item is never returned; the correct action depends on the item, the legal position, safety and safeguarding. School-banned items such as phones may be returned to the learner or parent under the school's published arrangements.

Where a device may contain safeguarding evidence, staff must consult the DSL before accessing, deleting or sharing content. Staff should not routinely search through personal digital content without a lawful and safeguarding-informed reason.

## 13. Removal from classrooms and supervised spaces

Removal from a classroom is a serious, time-limited response. It may be used where necessary to maintain safety, restore calm, support regulation, allow learning to continue, or respond to serious/persistent disruption. It is not the same as seclusion and it must not become an informal exclusion.

- Before removal, staff should normally use agreed classroom strategies and de-escalation unless immediate removal is necessary for safety.
- The learner must remain appropriately supervised and have access to suitable education or purposeful support, taking account of their needs and current level of regulation.
- The learner must not be locked in a room or prevented from leaving in a way that meets the definition of seclusion unless a lawful, necessary safety intervention is being used under section 14 and the recording/reporting duties are followed.
- Removal should last no longer than necessary and should be reviewed if repeated or prolonged.
- Parents should be informed of significant or repeated removals and the learner's behaviour/support plan reviewed where appropriate.

- A learner will not be sent out of the school building as a behaviour sanction except through the formal exclusion/placement procedure or where a separate safeguarding/medical arrangement lawfully requires it.

## **14. Restrictive interventions, reasonable force, seclusion and restraint**

### **14.1 Principles**

Restrictive intervention is an umbrella term for physical or non-physical action that prevents, restricts or subdues a learner's movement. Reasonable force may be used by school staff in limited circumstances to prevent or stop a learner from causing injury to themselves or others, committing a criminal offence, damaging property, or causing disorder among learners.

- The intervention must be necessary in the circumstances and proportionate to the risk.
- Staff must use the least amount of force or least restrictive intervention necessary for the least amount of time.
- Prevention, de-escalation, communication and less restrictive alternatives should be used where they are likely to be effective and there is time to do so.
- Force must never be used as punishment.
- A learner must never be restrained in a way that compromises airway, breathing or circulation. Ground restraint creates particular risk and should be avoided wherever possible.
- The learner's medical needs, SEND, disability, trauma, communication needs, age, size, dignity and equality considerations must inform decision-making.
- The existence of an agreed behaviour plan does not automatically make an intervention appropriate in a particular incident; staff must still assess the circumstances.

### **14.2 Seclusion**

Seclusion is a non-disciplinary safety intervention in which a learner is kept apart from others and prevented from leaving, for example by physical obstruction, securing the place, or causing the learner to believe they will be punished if they leave. It should only be used as a safety measure to protect others from harm when a learner is highly dysregulated, never as punishment. The space must be safe, the learner must be supervised throughout, and the learner must be allowed to leave as soon as the immediate risk has reduced.

### **14.3 Recording and reporting**

VTC will maintain procedures that meet the statutory recording and reporting requirements. These duties apply even where restrictive intervention is anticipated in an agreed support plan.

- Each significant use-of-force incident must be recorded in writing as soon as practicable, with staff aiming to complete the record the same day.
- Every seclusion or restraint incident must also be recorded as soon as practicable, including restraint without direct physical contact (for example, removing a mobility aid to restrict movement).
- Parents must be informed in writing as soon as practicable, ideally the same day, of each reportable incident unless the learner is aged 20 or over or reporting to a parent would be likely to result in significant harm to the learner. Where no parent can safely be informed, the required local authority notification will be made.
- Where an incident is both restraint and a significant use of force, VTC will avoid duplicate reporting and follow the applicable statutory procedure.
- The record will include the minimum fields in Appendix C, and the learner and staff will be offered appropriate medical, wellbeing and debrief support.
- The Headteacher/SLT will review patterns and disproportionality and update plans, risk assessments or training where needed.

Detailed operational practice is set out in VTC's Restrictive Physical Intervention Policy. If there is any conflict, the current law and statutory guidance take precedence and the school policy must be updated promptly.

## **15. Safeguarding, serious incidents and suspected criminal behaviour**

Changes in behaviour, sudden dysregulation, self-harm, aggression, sexualised behaviour, substance use, missing episodes or significant changes in attendance may indicate that a learner needs help or protection. Staff must consider safeguarding whenever behaviour changes or escalates.

- If a learner may be suffering or likely to suffer harm, staff follow the Child Protection and Safeguarding Policy and contact the DSL/deputy immediately.
- Where there is immediate danger, staff prioritise safety and emergency services may be contacted.
- Suspected criminal behaviour will be assessed by SLT/DSL, including whether police involvement is necessary and proportionate and whether safeguarding referrals are also required.
- Relevant evidence will be preserved. Staff will not conduct their own investigation in a way that compromises safeguarding or police processes.
- Victims, witnesses and alleged perpetrators will be offered appropriate support and risk management.

A behaviour response may run alongside safeguarding or police action, but staff must ensure that the school's response does not prejudice an external investigation or expose any learner to additional risk.

## **16. Off-site and online behaviour**

VTC may respond to misbehaviour outside school where there is a sufficient connection to the school, learner safety or the orderly running of the school. This may include behaviour:

- During a school-organised or school-related activity, trip, placement or work-related learning.
- When travelling to or from school.
- When the learner is identifiable as a VTC learner.
- Online or off site where it poses a threat to another learner, staff member or member of the public, damages the school's orderly operation, or has a significant impact within the school community.

Any decision to impose a school sanction for off-site behaviour will be proportionate, based on reliable information and made by an authorised member of staff. Safeguarding concerns will be referred to the DSL regardless of where the incident occurred.

## **17. Exclusion, termination of placement and reintegration**

Exclusion is a serious response and should be used only in accordance with VTC's separate Exclusions Policy and the learner's admissions/placement arrangements. As an independent school, VTC is not governed by the statutory maintained-school/academy suspension and permanent exclusion procedure, but decisions must still be fair, properly authorised, documented and consistent with equality, safeguarding and contractual/commissioning obligations.

- No exclusion decision will be made solely because a learner has SEND or a disability. The school will consider reasonable adjustments, unmet provision and whether additional support could reduce risk.
- Where a learner has an EHC plan or is publicly funded, VTC will involve the placing local authority in accordance with the placement agreement and relevant duties, and will request/recommend an urgent review where the placement may no longer be suitable.
- Informal, unrecorded or indefinite "cooling-off" exclusions are not used.

- Any temporary exclusion will include clear communication about the reason, duration, education/support arrangements and reintegration expectations.
- Reintegration will be planned around safety, relationships, support strategies and any required changes to risk/behaviour plans.

A reduced or part-time timetable is not a behaviour sanction. Where a temporary adjusted timetable is considered for welfare or educational reasons, it must be individually planned, recorded, regularly reviewed and compliant with VTC's attendance, safeguarding and placement arrangements.

## **18. Recording, monitoring and use of data**

### **18.1 Incident recording**

Staff will record behaviour incidents using the approved VTC systems. The level of detail should be proportionate to the seriousness and risk. Serious incidents, safeguarding concerns, restrictive interventions, searches and serious sanctions require the relevant dedicated record as well as any routine behaviour entry.

### **18.2 Serious sanction record**

The proprietor must ensure that a record is kept of sanctions imposed for serious misbehaviour. VTC's record will enable the school to show what happened, what sanction was imposed, who authorised it, why it was proportionate, what support/adjustments were considered, and what follow-up occurred. Appendix B sets out the minimum school fields.

### **18.3 Monitoring and disproportionality**

SLT will review behaviour information at least termly, and more frequently where concerns arise. The review should include:

- Frequency, location, time and type of incidents and serious sanctions.
- Repeated removals, exclusions, searches, bullying/discrimination incidents and restrictive interventions.
- Patterns involving individual learners, peer groups, staff teams, curriculum areas or times of day.
- Possible disproportionality affecting disabled learners, learners with SEND, other protected characteristics or other vulnerabilities.
- Whether individual plans, reasonable adjustments and de-escalation strategies are effective.
- Whether staff practice is consistent with the policy and whether further training or supervision is needed.

Behaviour information will be handled in accordance with the school's data protection, record retention and safeguarding arrangements. Access is limited to those who need the information for their role.

## **19. Training and staff support**

Behaviour management is part of staff induction and continuing professional development. VTC will provide training proportionate to its SEMH context and the needs of learners and staff.

- Positive behaviour support, relational practice and consistent routines.
- Understanding SEMH, SEND, communication, sensory needs, trauma and emotional regulation.
- De-escalation, dynamic risk assessment and alternatives to restrictive intervention.
- Safe and lawful restrictive-intervention practice for staff whose role may require it, using training that reflects the April 2026 DfE guidance.
- Safeguarding, child-on-child abuse, harmful sexual behaviour and appropriate reporting routes.
- Equality, reasonable adjustments and avoiding discriminatory behaviour responses.
- Search/confiscation and mobile phone procedures for staff who may need to use them.
- Accurate incident recording, reflective debrief and learning from data.

Following significant incidents, VTC will consider support for staff as well as learners, including debrief, medical assessment where needed, supervision and review of risk controls.

## 20. Transition and information sharing

VTC supports transition into the school, between year groups/parts of provision, into post-16/adult life and to a new setting. Behaviour support is most effective when relevant information is transferred safely and in time.

- Learner voice and parent/carer views should inform transition planning.
- Relevant EHC plan information, support strategies, communication needs, risk assessments and successful de-escalation approaches should be available to staff who need them before the learner starts or transitions.
- Safeguarding information is transferred by the DSL in accordance with KCSIE, with confirmation of secure receipt where required.
- Serious risk-to-others information is shared on a need-to-know basis where necessary to keep learners and staff safe, while respecting data protection and confidentiality.
- Where a learner leaves following serious behaviour or placement breakdown, VTC will cooperate with the placing authority/receiving setting to support safe continuity of education and safeguarding.

## 21. Communication, complaints and policy availability

VTC will communicate this policy and key expectations to staff, learners and parents in formats that are understandable and accessible. The policy and particulars of the school's arrangements for misbehaviour/exclusions and behaviour/anti-bullying will be made available to parents and prospective parents in accordance with the Independent School Standards.

Parents or learners who wish to challenge a behaviour decision should first raise the matter with the relevant member of staff or Headteacher. Formal complaints are handled under the VTC Complaints Policy. Complaints or allegations about restrictive intervention are also managed under the complaints procedure, with KCSIE procedures followed where an allegation concerns staff conduct or safeguarding.

## 22. Monitoring and review

The Headteacher will review implementation of this policy with the Advisory Board and provide appropriate assurance to the Proprietor. The formal policy will be reviewed at least annually and sooner if:

- Law or statutory guidance changes.
- An inspection, audit, complaint or serious incident identifies a policy weakness.
- Behaviour or restrictive-intervention data identifies a pattern or disproportionate impact.
- School systems, age range, provision or operational arrangements materially change.

The next scheduled review is September 2027. Any interim change that affects learner expectations or parent information will be communicated promptly.

## Linked VTC policies and procedures

- Child Protection and Safeguarding Policy (including child-on-child abuse procedures).
- Anti-Bullying Policy / strategy.
- Restrictive Physical Intervention Policy.
- Exclusions Policy / placement termination procedure.
- SEND Policy and EHC plan/annual review procedures.
- Online Safety / Acceptable Use Policy.
- Mobile Phone procedure (if maintained as a separate operational document).

- Complaints Policy.
- Attendance Policy.
- Health and Safety Policy and relevant risk assessments.
- Data Protection and Records Management policies.
- Mentoring / pastoral support arrangements.

---

*This policy will be reviewed by the Proprietor / Advisory Board as per the Policy and Procedures Review Schedule.*

---

## Appendix A - VTC Behaviour Principles

These principles are a VTC governance and ethos statement. Independent schools are legally required to maintain and implement a written behaviour policy; this appendix is retained because it expresses the school's approach and supports consistent implementation.

| Principle                             | What this means at VTC                                                                                                                                               |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Safety first</b>                   | Every learner and adult has the right to learn and work in an environment that is safe, respectful and appropriately supervised.                                     |
| <b>Behaviour is communication</b>     | Staff seek to understand what behaviour may be communicating, without excusing harm or removing appropriate accountability.                                          |
| <b>Relationships matter</b>           | Trusting, professional relationships, calm adult behaviour and predictable routines are central to successful SEMH practice.                                         |
| <b>High expectations with support</b> | VTC maintains clear expectations while adapting teaching, communication and behaviour responses to individual need.                                                  |
| <b>Least restrictive response</b>     | Prevention, co-regulation, de-escalation and restorative approaches are preferred. Restrictive interventions are used only when lawful, necessary and proportionate. |
| <b>Dignity and equality</b>           | Learners are treated with dignity. Reasonable adjustments are made for disability and the impact of policies is monitored for unfair or disproportionate outcomes.   |
| <b>Restoration and learning</b>       | Where harm occurs, the focus is on safety, reflection, repair, learning and successful re-engagement rather than humiliation or punishment.                          |
| <b>Learner voice</b>                  | Learners are involved in expectations, support plans and reviews in ways appropriate to their age, communication and capacity.                                       |
| <b>Preparation for adulthood</b>      | Behaviour support should build independence, self-advocacy, resilience, safe relationships and readiness for community and working life.                             |
| <b>Partnership</b>                    | Parents, placing authorities and relevant professionals are involved where their information or support can improve outcomes.                                        |

| Principle                     | What this means at VTC                                                                                                          |
|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>Continuous improvement</b> | VTC uses incident data, debrief, complaints, learner voice and staff reflection to improve practice and reduce repeated crises. |

## Appendix B - Serious behaviour / serious sanction record requirements

For serious misbehaviour, the school's record should contain enough information to evidence the incident, decision, proportionality and follow-up. The record may be held electronically within VTC's approved systems provided it is secure and retrievable.

| Field                          | Minimum information                                                                                         |
|--------------------------------|-------------------------------------------------------------------------------------------------------------|
| <b>Learner</b>                 | Name/ID, year/phase, relevant SEND/disability or individual needs relevant to the decision.                 |
| <b>Incident</b>                | Date, time, location, activity, concise factual account, people involved/witnesses.                         |
| <b>Risk / safeguarding</b>     | Immediate risk, injuries, safeguarding concern, DSL referral, police/social care involvement if applicable. |
| <b>Antecedents / support</b>   | Known triggers, relevant plan, strategies or reasonable adjustments used/considered.                        |
| <b>Sanction</b>                | Exact sanction/consequence, duration, person authorising, date imposed.                                     |
| <b>Rationale</b>               | Why the sanction was judged necessary, fair and proportionate; alternatives considered where relevant.      |
| <b>Parent/LA communication</b> | Who was informed, by whom, when and how; placing authority involvement where applicable.                    |
| <b>Follow-up</b>               | Restorative action, support plan/risk assessment review, reintegration, referrals or further action.        |
| <b>Review</b>                  | SLT sign-off where required and any learning/action for staff or systems.                                   |

## Appendix C - Restrictive intervention record requirements

The following reflects the April 2026 DfE recording/reporting requirements. VTC's detailed incident form may contain additional fields.

| Field                             | Minimum information                                                                                                                          |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| <b>People involved</b>            | Learner and staff names; witnesses where relevant.                                                                                           |
| <b>Learner needs</b>              | Relevant circumstances, identified SEND/disability and SEN status code where recorded by the school.                                         |
| <b>When and where</b>             | Date, time, location and approximate duration.                                                                                               |
| <b>What happened</b>              | Brief factual account of events leading up to the intervention, including known/potential triggers.                                          |
| <b>Prevention / de-escalation</b> | Strategies used or considered and their effect.                                                                                              |
| <b>Intervention</b>               | Type of force/restrictive intervention, degree of force and whether seclusion/restraint occurred.                                            |
| <b>Necessity</b>                  | Why the intervention was assessed as necessary and proportionate in that instance.                                                           |
| <b>Injury / medical</b>           | Any physical injury or adverse impact; medical assessment/treatment provided.                                                                |
| <b>Post-incident support</b>      | Support/debrief for learner, staff and witnesses where appropriate.                                                                          |
| <b>Parent reporting</b>           | Date/time/method of written parent notification; if not notified, lawful safeguarding reason and alternative LA notification where required. |
| <b>Follow-up</b>                  | Learner/witness accounts where appropriate, plan/risk assessment review, lessons learned and actions.                                        |

### Timing requirement

Records must be made as soon as practicable after the incident, with staff aiming for the same day. Parents must be informed as soon as practicable and ideally the same day, subject to the statutory age/significant-harm exceptions.