Enemy of Boredom

Behaviour Policy

Approved by:	Steve Godwin, CEO
Date approved:	12th October 2026
Next review due by:	Within 12 months of approval, or sooner if legislation or statutory guidance changes
Policy owner:	Tracey Clark, COO
Applies to:	All learners and all staff, at all centres and in all online and off-site provision

1. Scope

This policy applies to all learners at all of our centres and in all online and off-site provision, and to all staff who work with them. It applies to children and to adult learners; the points that differ for adult learners are in section 19. It sets out how we promote positive behaviour, how we respond when behaviour falls below what we expect, and how we approach physical contact, restrictive interventions, searching and confiscation.

It should be read alongside our Child Protection and Safeguarding Policy, Staff Code of Conduct, Equality and Diversity Policy and AI Policy. Our commissioners remain responsible for the learners they place with us. Where a commissioner's requirements for a learner differ from this policy, we agree the approach with the commissioner in writing.

2. Aims

At Enemy of Boredom we aim to:

- create a culture of positivity, with positive role models, in which every learner can learn in a calm, safe and supportive environment;
- set and maintain high standards of behaviour that reflect our values;
- recognise each learner's individual needs while making sure that other learners' learning is not disrupted;
- provide an environment where learners feel safe and want to attend;
- promote equality and diversity, and praise and reward positive behaviour;
- respond in proportion to the seriousness and context of the behaviour, the learner's individual needs, the impact on others and the likelihood that the response will prevent it happening again; and

- keep the use of restrictive interventions to an absolute minimum through early support, prevention and de-escalation.

3. Legal and statutory framework

Guidance is referred to by name rather than by year, and each link leads to the current version.

- Non-school alternative provision: voluntary national standards. The standards expect us to have a behaviour policy that covers bullying and the use of reasonable force, to train staff in de-escalation and in avoiding restraint, to keep records of behaviour, and to share information routinely with commissioners and parents.
- Behaviour in schools. This is written for schools. Our commissioners work to it, and we use it as a benchmark for our approach.
- Restrictive interventions, including use of reasonable force, in schools. This is written for schools, and its statutory recording and reporting duties fall on them. Our commissioners are bound by it, so we follow it as our benchmark for physical contact, restraint and seclusion, and for recording and reporting.
- Searching, screening and confiscation. This explains powers that the law gives to schools. Those powers belong to schools and we do not rely on them. Section 12 sets out our own approach.

Our legal duties include the Equality Act 2010, the Children and Families Act 2014, the Human Rights Act 1998, the Health and Safety at Work etc. Act 1974, and the Data Protection Act 2018 and UK GDPR. Only a school headteacher has the legal power to suspend or permanently exclude a pupil, so we do not do so (see section 14).

4. Definitions

Learner: any child or adult who receives provision from us. An adult learner is aged 18 or over.

Commissioner: the school or local authority that places a learner with us and remains responsible for that placement.

Behaviour support plan: a written plan, agreed with the learner, their parents or carers and the commissioner wherever possible, that sets out the learner's triggers, what helps, how they communicate, the adjustments we make, and anything staff may do in a crisis, including any agreed physical contact.

De-escalation: the calm words, actions and changes to the environment that staff use to help a learner regain control before behaviour escalates.

Restrictive intervention: anything that prevents, restricts or subdues a learner's movement, whether physical or not.

Reasonable force: physical force that is necessary and proportionate, using no more force than needed for the shortest time needed.

Restraint: an intervention that immobilises a learner or limits their movement, with or without direct physical contact. Holding a learner's arms to their sides, or removing a mobility aid, are both restraint.

Seclusion: keeping a learner confined away from others and preventing them from leaving, whether by physically blocking them or by making them believe they will be punished if they try.

Time out: a learner is asked, or chooses, to spend time in an agreed space to calm and reflect. They are free to leave, are supervised nearby and are never confined. Time out is not seclusion.

Significant incident: any use of force that goes beyond the appropriate physical contact described in section 11.1.

5. Roles and responsibilities

5.1 COO

The COO reviews this policy with the Heads of Centre, monitors its effectiveness, holds the Heads of Centre to account for its implementation, and regularly reviews behaviour and restrictive intervention data across all centres.

5.2 Heads of Centre

Each Head of Centre:

- makes sure the centre is calm and encourages positive behaviour, and that all staff act as role models;
- checks that staff apply this policy consistently to all learners and understand the behaviour expectations and why they matter;
- offers training in behaviour management, de-escalation, and the impact of special educational needs and disabilities (SEND) and mental health needs on behaviour, to any staff who need it;
- reviews the behaviour log regularly to make sure no group of learners is disproportionately affected, with particular attention to any use of restrictive interventions; and
- shares data and learning with other centres so that monitoring is consistent.

5.3 Designated Safeguarding Lead

The DSL considers any behaviour that may indicate a safeguarding concern, and reviews every incident involving a restrictive intervention for safeguarding concerns.

5.4 Staff

Staff are responsible for:

- creating a calm and safe environment that engages learners, with clear routines and clear boundaries applied consistently;

- building positive relationships with learners, and communicating our expectations, routines and values in every interaction;
- modelling the behaviour and relationships we expect, and thinking about how their own behaviour affects the culture of the centre;
- giving each learner a personalised approach that reflects their needs;
- recording behaviour incidents promptly, ending each day positively and starting each day afresh;
- ensuring equal opportunities for all learners, and monitoring learners' and colleagues' behaviour in line with our Equality and Diversity Policy;
- following the Staff Code of Conduct; and
- raising any difficulty with the Head of Centre. The Senior Leadership Team (the COO and Heads of Centre) supports staff in responding to incidents.

5.5 Parents and carers

Parents and carers are key to our behaviour culture. Where possible, they:

- get to know this policy and reinforce it at home where appropriate;
- support their learner to follow it, and share the learner code of conduct in Appendix A with them;
- discuss any behaviour concerns with us and with the commissioner promptly, and take part in any pastoral work that follows an incident, such as reviews of behaviour support;
- raise any concern about how behaviour is managed with us directly, while continuing to work in partnership with us.

We build a positive relationship with parents and carers by keeping them informed of developments in their learner's behaviour, either directly or through the commissioner.

5.6 Commissioners

We ask commissioners to give us the information we need to support each learner's behaviour, including any behaviour or support plans, exclusion history and known triggers, and to review placements with us regularly.

6. Our approach to positive behaviour

We believe that learners do their best when they feel safe and nurtured, so we emphasise positive praise. Staff treat learners with mutual respect and recognise their growing independence. Positive reinforcement and rewards are applied clearly and fairly.

Positive behaviour is recognised through:

- verbal praise;
- praise communicated to parents or carers and the commissioner, by phone or in writing;

- inviting parents or carers and the commissioner in to see good work; and
- a buddy system, in which a settled and willing learner supports a newer learner with peer support and guidance.

Where appropriate and reasonable, we adjust routines within the programme so that all learners can meet our behaviour expectations.

7. What we expect of learners

During their induction, learners are told the standard of behaviour expected, that they have a duty to follow this policy so that their peers can learn, our key rules and routines, the rewards they can earn and the consequences they may face. They are also told that we do not tolerate discrimination against others, as set out in our Equality and Diversity Policy, and how to report any concern.

Learners are expected to:

- sign the Enemy of Boredom learner code of conduct (Appendix A);
- behave in an orderly and self-controlled way, and move around the centre safely and sensibly;
- show respect to staff and to each other, and make it possible for everyone to learn;
- treat buildings, equipment and property with respect;
- accept sanctions when they are given;
- challenge and report behaviour towards others that is discriminatory, harmful or disrespectful, including behaviour influenced by prejudice, misogyny or misandry, or by harmful online content; and
- avoid behaviour that brings Enemy of Boredom into disrepute, including when off site or online.

8. Responding to behaviour

8.1 Restoring calm

When a learner's behaviour falls below what can reasonably be expected of them, staff respond to restore a calm and safe learning environment and to prevent it happening again. This applies to face-to-face and online conduct.

8.2 De-escalation comes first

De-escalation is used in the first instance. This may include sensory items, "brain-breaks", a change of activity or space, a calm tone and body language, and time to process what is being asked.

8.3 Before a sanction is given

Where appropriate, staff:

- establish what happened and give the learner the chance to explain their account;

- consider the evidence and speak to relevant witnesses;
- consider SEND, safeguarding and other contextual factors;
- decide whether the behaviour breached our expectations and, if so, what response is appropriate; and
- record the incident and the action taken on our management information system.

8.4 Treating learners fairly

All learners are treated equitably under this policy, and any factors that contributed to an incident are identified and taken into account. These include SEND, communication difficulties, sensory needs, social, emotional and mental health needs, trauma or adverse experiences, unmet needs, medical conditions, disability, difficulties with regulation, changes in circumstances and safeguarding concerns.

Under the Equality Act 2010 we take reasonable steps to avoid a disabled learner being at a substantial disadvantage because of our policies or practices. Before deciding on a sanction for a learner whose SEND may have contributed to the behaviour, staff consider whether the learner was unable to understand the rule or instruction, was unable to act differently because of their SEND, or was likely to behave in that way because of their particular SEND. If the answer to any of these is yes, sanctioning the learner for that behaviour may be unlawful, and staff discuss this with the SEND Lead before deciding whether, and how, to respond.

8.5 Sanctions

A sanction may be given where a learner's behaviour affects the learning or wellbeing of others. Sanctions must be proportionate and reasonable, take account of the learner's SEND and individual circumstances, and be decided case by case with regard to fairness. When giving a sanction, staff also consider what support would help the learner meet our standards in future. Sanctions may include:

- verbal reminders of the behaviour expected;
- a three-step approach: after three verbal reminders the learner is invited to take time out in an agreed space to calm down. They are offered a drink and a snack to help them recover, are supervised nearby, are free to leave the space and to return when ready, and are never confined;
- emails or phone calls to parents or carers and to the commissioner;
- a meeting with the learner, their parents or carers, the tutor and the Head of Centre; and
- adjustments to the learner's programme or timetable, agreed with the commissioner.

Sanctions never include force, humiliation, group punishment, withholding food, drink, toilet breaks or medication, or sending a learner home without the commissioner's agreement. All sanctions are recorded as pastoral notes on our management information system.

8.6 Supporting a learner after a sanction

After a sanction, staff help the learner understand what happened, why it did not meet our expectations, and what would help them meet them next time. This may include a short conversation once the learner has calmed down, a check-in from their tutor the next time they attend, or, for a repeated pattern, a review of their behaviour support plan under section 17.

9. Bullying and child-on-child abuse

Bullying is behaviour, usually repeated, that hurts someone physically or emotionally. It can happen in person or online, and includes cyberbullying and prejudice-based or discriminatory bullying, such as bullying related to race, faith, disability, sex, sexual orientation or gender identity. We do not tolerate it.

Prevention. We teach respect and online safety, supervise carefully at arrival, departure, break and other unstructured times, and staff model respectful behaviour.

Reporting. Learners, parents and carers can tell any member of staff about bullying. Staff record every report on the same day.

Response. Staff listen to everyone involved, establish the facts, support the learner who was harmed, and respond to the learner responsible in proportion, looking for unmet needs. Parents or carers and the commissioner are informed, and the situation is monitored afterwards.

Safeguarding. Where bullying involves sexual harassment or violence, harmful sexual behaviour, exploitation or a possible crime, it is a safeguarding matter and is dealt with under section 8 of our Child Protection and Safeguarding Policy, led by the DSL.

Incidents are recorded and reviewed by the Head of Centre for patterns.

10. Online behaviour, mobile phones and AI

Online conduct. The behaviour we expect applies online as well as in person. Learners agree to use the internet responsibly, not to view or send offensive, threatening or illegal material, and not to share personal information. Learners are told that filtering and monitoring is in place on our devices and networks to keep them safe.

Mobile phones. Because we are alternative provision, learners may bring a phone on site. Phones should be switched off and used only outside task time. This reduces the risks of distraction, disruption, bullying and abuse. Some learners need a different arrangement because of their individual profile. Any exception is agreed case by case with the learner, their parents or carers and the commissioner, and recorded in their plan. Where a learner is allowed their phone on during task time, they may use it only to message their “safe adult”, the trusted adult named in their plan.

Phone safety rules. Learners must not take photos, video or audio of other people without their permission, or share images of anyone without permission. Phones are not used in toilets or changing areas. Staff do not search or view the contents of a learner’s phone. Where there is a concern about the

content of a phone, including nudes or semi-nudes, staff follow section 8 of our Child Protection and Safeguarding Policy and tell the DSL immediately. We are not liable for loss of or damage to phones.

AI. Our AI Policy applies to learners. Learners must not use AI to support work that will be assessed, and must not use AI to create, edit or share images, video or audio of real people, or to bully or deceive anyone.

11. Physical contact and restrictive interventions

We work hard to prevent situations where physical intervention could be needed. Our whole-centre measures include a calm and predictable environment, staff training in communication and de-escalation, trusting relationships between staff and learners, and analysis of incident data. Our individual measures include working with parents, carers and commissioners, behaviour support plans, and giving learners time, space and strategies to calm down before behaviour escalates.

11.1 Appropriate physical contact

We do not have a "no contact" policy. Some physical contact is appropriate and does not amount to a restrictive intervention, for example to give first aid, to guide or escort a learner, to comfort a distressed learner, to praise a learner with a pat on the back or handshake, or to demonstrate a technique. Staff use their judgement, considering the learner's age, whether other adults are present, whether the learner has SEND or other vulnerabilities, whether a non-contact alternative would work, and the learner's behaviour support plan.

11.2 Principles

- Restrictive interventions are used only as a last resort, when less restrictive approaches have not worked or there is no time to try them.
- Force is never used as a punishment, or to secure compliance or maintain good order.
- Staff use reasonable force only where the law allows, and only to prevent a learner injuring themselves or others, committing a criminal offence, or seriously damaging property.

11.3 Deciding whether an intervention is reasonable

Before and during any intervention, staff ask themselves:

- **Is it necessary?** Is there a less restrictive way to manage this, and will an intervention actually reduce the risk rather than make things worse?
- **Is it proportionate?** Am I using the least force, for the shortest time, that will reduce the risk, taking into account the learner's age, size, medical conditions, SEND and other vulnerabilities? If the intervention is escalating the situation, I must change approach.
- **Have I considered the learner's welfare?** How will this affect a learner who has experienced trauma or neglect, has sensory or communication needs, or is deaf or has English as an

additional language? I should protect their dignity, for example by moving away from an audience, explain calmly what is happening and why, and keep checking how they are feeling to decide whether to continue, reduce or stop.

11.4 Unacceptable uses of force

Using force as a punishment is illegal. Learners must never be restrained in a way that affects their airway, breathing or circulation, for example by covering the mouth or nose or applying pressure to the neck or abdomen. Any form of restraint carries a risk of physical and psychological harm and is avoided wherever possible. If a learner is unintentionally held on the ground, staff release or reposition them into a safer position as quickly as possible. Where appropriate, the learner receives medical assessment and treatment as soon as possible.

11.5 Seclusion

We do not use seclusion as a sanction, and it is not part of our routine practice. Time out (section 8.5) is different and is always available to a learner to leave. If seclusion were ever used as an emergency safety measure to protect others from harm while a learner is experiencing severe dysregulation, the place must be safe and not intimidating, the learner must be supervised at all times, it must never be threatened as a punishment, and the learner must be allowed to leave as soon as the immediate risk has reduced. It must then be recorded and reported in the same way as other significant incidents.

11.6 Recording

Every significant incident, every use of restraint (including restraint without contact) and every use of seclusion is recorded in writing by the staff involved as soon as practicable, and no later than the end of the same day. This applies even where an intervention is agreed in a learner's behaviour support plan. As a minimum the record states:

- the names of the learner and the staff directly involved;
- any relevant needs or circumstances of the learner, including any identified SEND;
- the time, date, location and approximate duration;
- what led up to the incident, any known triggers, and the prevention and de-escalation strategies used;
- what type of intervention and degree of force was used, and why it was assessed as necessary; and
- any injuries, and any support or medical treatment given after the incident.

11.7 Reporting

- We tell the commissioner promptly, ideally on the same day.

- We tell the parents or carers of a learner under 18 as soon as practicable, aiming for the same day, in writing, giving the time, date, location and approximate duration, why the intervention was needed, what type and degree of force was used, and any injuries. Where a local authority is providing accommodation for the child, we tell the authority. We also offer parents and carers a follow-up conversation.
- Where a staff member believes that telling a parent or carer would be likely to result in serious harm to the learner, we do not tell that person. We tell any parent or carer who can be told safely, or the local authority where the learner ordinarily lives, and the DSL takes advice from the commissioner.
- For adult learners, see section 19.

11.8 After an incident

- Injuries are treated, recorded in our accident records and reported to the Health and Safety Executive where required.
- The DSL reviews the incident for safeguarding concerns.
- A follow-up conversation is held with the learner and, separately, with the staff involved, ideally led by a member of staff who was not involved. Its aim is to understand what happened and why, to learn from it, and to repair relationships.
- We support the learner, the staff involved and any learner who witnessed the incident, and keep checking on their wellbeing.
- The Head of Centre evaluates the incident as soon as practicable, looks for patterns and triggers, and reviews or introduces a behaviour support plan.

11.9 Training and risk assessment

Staff who are likely to need to use restrictive interventions are trained in their safe and lawful use and in prevention. Where there is an identified risk, we carry out a risk assessment for staff and mitigate it through training and prevention strategies.

12. Searching, confiscation and prohibited items

12.1 Prohibited items

The following are not allowed on site or in sessions, for learners of any age: weapons; alcohol; illegal drugs; stolen goods; tobacco and vapes; pornographic material; fireworks; and anything that has been, or is likely to be, used to cause injury or commit an offence. Energy drinks are not permitted on the premises, as part of our expectations for health, wellbeing and readiness to learn.

12.2 Our approach

The statutory search powers belong to schools, and we do not rely on them. Our staff never search a learner's person and never use force to search a learner or to take an item from them. Instead:

- staff may ask a learner to hand over an item, or to show the contents of a bag or pockets. The learner's agreement must be freely given and not pressured. Agreement is not treated as genuine if the learner is distressed or cannot understand what is being asked;
- where practicable, two members of staff are present, in a private place away from other learners;
- if a learner refuses, staff do not search. They keep the learner and others safe, tell the DSL or Head of Centre, and contact the commissioner and the learner's parents or carers;
- where a weapon or illegal drug is suspected, or anyone is at risk, we call the police, who use their own powers. In an emergency we call 999.

12.3 Items handed over

Items handed over are held safely. Weapons and illegal items are given to the police. Other items are returned to the learner's parent or carer, or to an adult learner, where it is lawful and safe. We record the date and time, the reason, what happened, what was found or handed over, and what action was taken, including any sanction.

12.4 Strip searches

Enemy of Boredom staff never carry out a strip search. Strip searches on our premises are carried out only by police officers, in accordance with the law.

13. Learners who go missing or abscond

Our learners are more vulnerable than their peers in mainstream education because of their SEND, so we take particular care to prevent, and to respond well to, a learner leaving a session or a centre without permission. This section covers a learner who was with us and then leaves without permission. Where a learner simply does not arrive, that is an attendance matter and is covered by our Attendance Policy.

13.1 Prevention

- Every learner who is at risk of leaving without permission has an individual risk assessment, usually as part of their behaviour support plan, covering known triggers, how they typically behave, and where they are likely to go.
- All staff working with that learner know their specific needs and behaviour, and use de-escalation as set out in section 8.

13.2 If a learner leaves without permission

- Any member of staff who notices tells the Head of Centre immediately.
- Staff search the building and grounds straight away to confirm the learner has left the premises.
- Once we confirm the learner is missing, the Head of Centre starts a log of every action and the time it was taken.
- The Head of Centre carries out a dynamic risk assessment, taking into account the learner's age, vulnerability, general ability, likely reason for leaving, and where they may have gone.
- The learner's parents or carers, or for an adult learner their emergency contact, are told and kept updated. We tell the commissioner immediately, and other agencies, such as children's social care, where appropriate.
- The Head of Centre decides whether staff should try to keep the learner in sight from a safe distance, without following them into danger, such as a busy road, and whether to try to engage with them, based on the individual risk assessment and staff's knowledge of the learner.

13.3 Involving the police

Whether and when to involve the police depends on the individual learner and situation, and is not left later than 15 minutes after losing sight of the learner unless a decision has been made, with parents or carers wherever possible, that this is not yet necessary. Where a learner is in immediate danger, we call 999 straight away, without waiting.

13.4 When the learner is found or returns

We tell the learner's parents or carers, or their emergency contact, straight away, and tell the police if they were called. We are not legally required to keep a centre open beyond its normal hours once parents or carers and, where involved, the police have been told, though we do not stop looking for a learner simply because the day has ended, and we agree next steps with the commissioner and family.

We decide on any follow-up with the individual situation in mind, which may include a sanction, a supportive response, or both, and we involve parents and carers in this. Every incident is reviewed for what triggered it and whether the learner's risk assessment or behaviour support plan needs to change.

13.5 Safeguarding

An incident where a learner goes missing is always reported to the DSL. Repeated incidents, or a learner going missing in circumstances that suggest criminal or sexual exploitation, are treated as a safeguarding concern under our Child Protection and Safeguarding Policy, which covers this as part of extra-familial harm.

14. Ending or pausing a placement

We do not suspend or permanently exclude learners, because only the headteacher of a school has those legal powers. Where a learner's behaviour puts safety at serious risk, or we cannot meet their needs, the DSL and Head of Centre tell the commissioner promptly, and we work together on the next step. Options include:

- reviewing the learner's support, including their behaviour support plan;
- adjusting the programme, timetable or setting;
- agreeing a temporary pause with the commissioner; and
- ending the placement, by written notice to the commissioner after a review, so that the commissioner can arrange suitable education.

We never send a learner home informally, or ask a learner to stay away, without the commissioner's agreement. Where a learner must leave immediately to keep people safe, we tell the commissioner and the learner's parents or carers straight away.

15. Learner transition

15.1 Starting with us

When a learner joins us, we induct them into our behaviour expectations and routines, explain the learner code of conduct (Appendix A) in a way that suits their needs, and introduce them to their tutor and the trusted adults they can talk to. Where a learner's referral or EHC plan shows a known trigger or an existing behaviour support plan, we ask the commissioner for this before the learner starts, so support is in place from day one.

15.2 Moving on

When a learner leaves us, whether to return to a mainstream setting, move to another provider, or progress to employment, training or further education, we share relevant behaviour information with the commissioner and, where appropriate, the learner's next setting, so that support continues without a gap. We do this in a way that is transparent with the learner and their parents or carers, and in line with our Data Protection Policy.

16. Behaviour outside the setting

If we receive a complaint from an external party about a learner's behaviour, particularly when wearing an Enemy of Boredom lanyard or during breaks, we may apply sanctions. We phone the learner's parent or carer and the commissioner, and adapt provision to the situation. This may involve going off site during session hours being withdrawn as a privilege, or days of provision being moved, in agreement with the commissioner.

17. Behaviour support plans and reviews

Where a learner may need one, we develop a behaviour support plan with the learner, their parents or carers and the commissioner. It sets out any adjustments, ways the learner can communicate their needs, and any circumstances in which increased physical contact may be appropriate, with clear limits. A plan does not remove our duty to assess whether any intervention is reasonable at the time.

Plans are reviewed with the learner and their parents or carers periodically, after any significant incident, and with the commissioner at least every six weeks, so that changes reflect what has and has not worked. We record learners' behaviour and progress, and share behaviour information routinely with commissioners and parents or carers.

Where a learner leaves the centre without permission, staff follow section 13 of this policy and section 6 of our Child Protection and Safeguarding Policy, and tell the commissioner immediately.

18. Safeguarding and behaviour

A change in a learner's behaviour may be a sign that they need help or protection. Behaviour is not automatically treated as deliberate misconduct where it may be linked to safeguarding, SEND, mental health, medical or other unmet needs. Staff consider whether a learner's behaviour may be linked to their suffering, or being likely to suffer, significant harm. It may also be a case of adjusting the individual learning plan.

Where this may be the case, we follow our Child Protection and Safeguarding Policy and consider pastoral support, early help or a referral to children's social care.

19. Adult learners

Adult learners are treated as adults, and this policy applies to them with the following differences:

- At admission, each adult learner tells us who, if anyone, we may contact about their behaviour, and we record this. We contact those people, and no one else, unless it is necessary to prevent serious harm. We tell the learner and the commissioner about behaviour concerns.
- Searching and confiscation depend entirely on the adult learner's agreement, as in section 12. Staff never search an adult learner's person or use force to do so.
- Where a restrictive intervention is used on an adult learner, we record it in the same way and tell the learner and the commissioner promptly. We tell only the people the learner has agreed we may contact, or others where necessary to prevent serious harm.
- Sanctions are proportionate, and take account of the adult's capacity, autonomy and needs. Section 10 of our Child Protection and Safeguarding Policy applies where an adult learner may be at risk.
- Where adult learners and children share a centre or session, the Head of Centre assesses the risks and adjusts supervision and session plans.

20. Training, data and review

- All staff receive training on this policy at induction, and regular training in behaviour management, communication and de-escalation, trauma-informed practice, and the impact of SEND and mental health needs on behaviour. Training also covers the risks associated with generative AI, and identifying and challenging extreme misogynistic or misandrist online content.
- Staff likely to need to use restrictive interventions receive additional training in their safe and lawful use.
- Heads of Centre and the COO review data on behaviour and restrictive interventions regularly, looking for repeat patterns and triggers and for any disproportionate impact on learners who share protected characteristics, have SEND or are otherwise vulnerable. They take care not to over-interpret small numbers, and use what they find to improve practice, training and behaviour support plans.

21. Challenging a sanction or making a complaint

A learner, parent or carer can challenge a sanction, or complain about the use of a restrictive intervention, by raising it with the Head of Centre. If it is not resolved, they can ask for it to be reviewed by the COO, and can involve the commissioner at any stage. Complaints are handled under our complaints procedure.

Any allegation that a member of staff has used force or another restrictive intervention inappropriately is handled under section 11 of our Child Protection and Safeguarding Policy, including the provisions on suspension of staff. Nothing in this policy stops anyone from going directly to the commissioner or to the local authority's children's social care.

22. Monitoring arrangements

This policy is reviewed annually by the COO. At every review, the policy is approved by the CEO. It is reviewed sooner if legislation or statutory guidance changes, after a serious incident, or following learning from a commissioner's quality assurance visit. It is published on our website and is available to staff, learners, parents and carers, and commissioners.

23. Related policies

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Equality and Diversity Policy
- AI Policy
- Data Protection Policy

Appendix A: Learner code of conduct

Every learner reads this code before they join us, and we explain it again at induction in a way that suits their needs. A learner under 18 also has a parent or carer read and sign it.

Before you join us, please read this agreement. If you would like it explained, or would like a support person to go through it with you, please ask. If you are under 18, please also talk about it with your parent or carer, who will read it too and sign it.

Respect

- I will treat staff, other learners and visitors with respect, and I will not use language that is offensive or hurtful.
- I will not bully, threaten, tease or discriminate against anyone, in person or online.
- I will follow staff instructions and the centre rules, and move around the centre safely and sensibly.
- I will look after the building, equipment and other people's property.

Staying safe

- I will not bring or use weapons, alcohol, illegal drugs, tobacco, vapes or other banned items, whatever my age.
- I will not take photos, video or audio of other people without their permission, and I will never share images of anyone without their permission.

Phones, online and AI

- I will follow the phone arrangements that apply to me: my phone is switched off and used only outside task time, unless something different has been agreed for me.
- I will be responsible for how I behave on the internet, including social media. I will not deliberately look at, download or send anything offensive, threatening, bullying or illegal, and if I come across something like that by accident I will tell a member of staff straight away.
- I will not give out personal information online, such as my phone number or address, and I will not share my passwords.
- I will follow the rules on AI. I will not use AI to help with work that will be assessed, and I will not use AI to make or share pictures, video or audio of real people, or to bully anyone.
- I understand that filtering and monitoring is in place on Enemy of Boredom devices and networks to help keep me safe.

Getting help

- If something upsets or worries me, or I am worried about someone else, I can tell my tutor (the member of staff leading my session), the Head of Centre, the Designated Safeguarding Lead named on the poster at my centre, or any adult I trust.
- I understand that staff cannot keep a safeguarding worry secret, because they have to make sure I am safe.

Fairness

- I understand that these rules are there to keep everyone safe and able to learn. If I find them hard to follow, I can ask for help, and staff will look for the reason and adjust my support.
- I understand that if I break the rules, staff will follow the Behaviour Policy and will tell my school, college or local authority, who decide with us what happens next. Staff will also tell my parent or carer, or the people I have agreed they can contact.
- When I hand in assessed work, I will sign a declaration. Anything without a reference is my own work, and I will not copy anyone else's work.

I have read this code of conduct and I agree to follow it.

	Signature	Date
Learner's signature		
Learner's name		
Parent or carer signature and name (learners under 18 only)		