

3 June 2026

Dear Sir/Madam,

## **Restrictive Interventions: Guidance for educational settings**

### **CSSC Context**

- As the support body for almost half of the schools in Northern Ireland, the Controlled Schools' Support Council (CSSC) welcomes this opportunity to respond to Department of Education's Restrictive Interventions: Guidance for educational settings.
- The controlled sector is the largest education sector in Northern Ireland, representing 49% of all schools. CSSC supports controlled schools in Northern Ireland which include Nursery Schools, Primary Schools, Secondary Schools, Grammar Schools, Integrated Schools, Special Schools and Irish-Medium Schools. Additionally, 27% of children and young people who attend controlled schools are entitled to Free School Meals.
- 38 of 40 Special Schools in NI are controlled schools and 32,250 pupils with Special Educational Needs (SEN) are educated within controlled schools.
- CSSC invited the leaders of controlled schools to share their views on the proposed model. More than 20 schools engaged with CSSC to inform this response.

### **Policy Background**

- The Independent Review of Education (IRE)<sup>1</sup> stated that 'Education is the greatest investment any society makes in its own future. Responsible citizenship, prosperity and fulfilled lives depend on it. In a world changing at an unprecedented pace, peace and prosperity depend on education more than ever before.'
- CSSC continues to be concerned about the impact of underfunding on our education system. The significant funding deficit facing education, with schools reporting deficits and infrastructure delays directly undermines efforts to support our children and young people.

---

<sup>1</sup> [Independent Review of Education](#)

[TransformED NI: Transforming teaching and learning: a strategy for Educational Excellence in Northern Ireland | Department of Education](#)

- The profile of our pupil population has continued to change over recent years resulting in increased pressures in SEN provision. SEN Transformation is a priority for the Executive and adequate resourcing is essential to support the SEN Reform Agenda and deliver “Better Support for Children and Young People with Special Educational Needs”.
- Effective multi-agency working, in accordance with the duty to cooperate established in the 2015 Children’s Services Co-operation Act, is required without delay to improve outcomes for children and young people with SEN. Enhanced partnership working between Education and Health is vital as early identification supports earlier intervention and better outcomes.
- CSSC has publicly raised concerns regarding the significant constraints on education funding and its impact on our children and young people. This follows over a decade of systemic underfunding of education in NI evidenced by a report from Institute of Fiscal Studies.
- Historic underfunding has resulted in reduced school budgets which has impacted negatively upon services provided to all schools by the EA but particularly Controlled Schools. It is vital that the Northern Ireland Executive agree a multi-year budget with an adequate and appropriate settlement to give schools the opportunity to plan and implement processes such as the restrictive interventions training but also current programmes such as nurture funding and extended schools.
- As noted in the TransformED NI strategy published in March 2025, "The growing economic power houses of the 21st century are those nations that have placed an absolute premium on getting their education system right. Northern Ireland must do the same." This aligns with CSSC's position that education is not merely an expense but an even sit better as an Introduction. investment in Northern Ireland's future.

### **Introduction**

- Controlled school leaders view the use of restrictive practices, indeed any type of physical intervention to prevent harm to the child/young person or others, as a last resort measure and are clear that their use would never represent a schools’ first intervention in responding to crisis. School leaders and staff are committed to upholding the legal and ethical principles of the guidance and concern for the welfare of all children informs all schools’ provision.

### **Training and Guidance**

- During engagement with the leaders of controlled schools there was a clear and consistent call for schools to receive training which would support their implementation of this guidance. CSSC therefore welcomes the guidance’s identification of EA’s crucial role in developing a model policy for all schools and regularly reviewing relevant training to support implementation of the guidance.
- School leaders understand the importance of de-escalation techniques as a means of reducing the use of restrictive interventions, however, current training provision is not

consistent across schools. While some schools report a degree of confidence in strategies which support the reduction of restrictive interventions, other schools do not feel that their staff have been able to avail of relevant training in this area. CSSC requests that the guidance provides greater clarity in respect of which training from EA or other agencies would support confidence in the use of de-escalation techniques.

- CSSC is conscious that schools facilitating specialist provision classes have been able to avail of EA training which takes a Whole School Approach to Prevent, Relate, Support and Respond to Behaviours that Require Intervention. CSSC understands that this training has been well received by participating schools and that it is the intention of EA to provide this training to a wider cohort of schools in September 2026. Where such programmes have proven to be effective in supporting staff confidence in responding to behaviour, it is crucial that training is made available to the wider network of schools.
- CSSC, conscious that the Connecting and Caring whole school approach framework represents just one of the programmes available from EA, welcome the guidance's identification of EA's role (as articulated in Appendix 4 of the guidance) of ensuring that all schools are aware and have access to appropriate training.
- School concerns regarding protection from legal challenge regarding the use of restrictive interventions emphasise the need for EA to formally endorse a training model that equips all staff with the necessary skills to respond to behaviour which may require intervention. While the guidance is clear that schools should not adopt a 'no contact' policy, some school leaders report that school staff can be wary of intervening and so there is the very real possibility that a lack of confidence could prevent staff from intervening where reasonable.
- CSSC's response to the draft guidance consulted on in November 2023 highlighted the need for a regional standard of support and noted that the Department should clarify for schools the status of Team Teach. and the response emphasised that if Team Teach is not considered to be the appropriate model for Northern Ireland, that an alternative programme of training and support should be recommended.
- Discussion with the leaders of special schools highlighted that ensuring that all staff have received Team Teach training and that accreditations are up to date persist. Special schools note that the number of Team Teach trainers across schools varies and the requirement to ensure that the accreditation is renewed annually represents a significant workload for special schools.

- CSSC understands that Team Teach training can only be provided for up to 12 members of staff at any one time and this emphasises the need for special schools to receive additional school development days as many school development days in special schools are given over to ensuring that staff receive appropriate training in approaches such as Team Teach and training associated with the specific medical needs of some pupils. This therefore reduces the time available to special schools to focus on school improvement priorities.
- The leaders of special schools noted that Team Teach serves schools well in the response to behaviours, however, unlike the situation when the Team Teach model was first introduced, under the Education Authority, it has been indicated that its implementation and management has been largely left to the leaders of special schools. School leaders were clear that this situation needs to be re-considered in the context of increasing workload pressures and the complexities of supporting re-accreditation.
- The leaders of special schools emphasised that it should be for EA and, where appropriate, the Health and Social Care Trusts to identify and manage programmes such as Team Teach ensuring that special schools do not face fragmented class teams where not all staff have received the necessary training to support the child in distress.
- During consultation with controlled schools, leaders confirmed that the social emotional and behavioural needs of children and young people are increasing. Special schools noted that EA's development of a Behaviour Protocol for special schools has been very supportive in the immediate response to crisis situations and commended the multi-disciplinary approach that this model takes. The effectiveness of the Farouk Problem Solving Model in special schools was highlighted and CSSC is conscious that this model is also a feature of EA's Graduated Response Framework. Consideration of embedding this model across all phases of education as a means of supporting schools to address SBEW needs is recommended.

### **Staff Protection and Wellbeing**

- A recurring theme and concern from all our direct engagement was that staff feel vulnerable and unprotected regarding restrictive interventions both legally and emotionally. This includes staff having fears around false accusations and uncertainty about what constitutes reasonable intervention. While there is an acknowledgement that this new guidance significantly improves on the draft version presented for consultation in 2023, school leaders feel that the guidance would be enhanced with the inclusion of case studies and examples to illustrate proportionality and de-escalation in practice.
- During consultation school leaders expressed concern for the health and safety and emotional health and wellbeing of staff. The guidance does not address how to manage structured time for staff to regulate following distressing incidents. DE's, Children and Young People's Emotional Health and Wellbeing in Education Framework, specifies 'opportunities for staff debriefing/supervision' as a specific example of effective practice

in supporting wellbeing of staff. Despite this there is a significant lack of support in developing the capacity of staff in special schools to facilitate supervision. Furthermore, the busy school day and the challenges of working to support the needs of the school community do not allow enough time for debriefing after severe incidents.

- CSSC would draw the Department attention to a study conducted by Barnardo's Scotland which explored the barriers and enablers to supervision within education and would recommend that specific consideration be given to how supervision can be effectively supported in educational settings especially as DE's Children and Young People's Emotional Health and Wellbeing in Education Framework specifies 'opportunities for staff debriefing/supervision as a specific example of effective practice in supporting the wellbeing of staff.
- The reporting and recording of incidents of physical injury to staff from responding to dysregulated behaviour is a significant issue of concern and school leaders were of the view that reference to these incidents as 'Accidents' is wholly inappropriate. Schools report receiving a speedier response to incidents where staff have tripped or slipped on school grounds than they have to reports of physical injury to staff.

### Reporting requirements

- School leaders noted that the reporting process outlined in Appendix 2 in the form of a recommended proforma is too lengthy and does not represent the most efficient and effective means of supporting this requirement. School leaders recommended a more concise standardised, digital reporting form which submits the information directly to EA, noting that the current proforma is not fit for purpose.
- The leaders of special schools note their use of Team Teach's reporting mechanisms and highlighted the value of AI to support post-incident reflections. Training for the implementation of this guidance needs to consider a supported approach to post incident reflections. School leaders confirmed that EA does not currently have a role in post-incident learning reviews.

### Special Schools - Specific Issues

- CSSC is conscious that the previous draft guidance (consulted on in 2023) included explicit reference to the use of chemical restraint while the current draft guidance does not refer to it at all. The leaders of special schools highlighted this omission and described how some children require PRN medication which is prescribed by the child's

GP and administered at the request of parents to support the child's regulation. Schools communicated concerns about their responsibility for assessing the need for this medication during the school day.

- Schools noted that while there is guidance to support the administration of medication for children and young people with epilepsy there are no detailed, health-led protocols for the administration of PRN medication. Ultimately, the absence of clear guidance on the administration of PRN medication places the leaders and staff of special schools in an extremely vulnerable position.
- In many special schools the medical needs of pupils are significant and warrants an onsite nurse to support school staff with the development of a Medication Plan and Protocol where required. School leaders at present have to develop their own protocols. CSSC recommends that DE in collaboration with the Department of Health work to support the development of protocols which ensure that staff are appropriately supported and protected in carrying out this role. DE and DOH ownership of such a protocol would provide assurances to staff that they are legally protected.

### **Conclusion**

- School leaders consider the guidance to be clear and understandable; however, the inclusion of case studies would greatly enhance schools' knowledge and understanding of how to implement the guidance on a practical basis.
- School leaders are clear that additional training is required to clearly communicate the requirements of the guidance to all staff and mitigate any concerns about the use of reasonable force.
- In articulating the need for the guidance to be supported by relevant training, the leaders of controlled schools referenced the additional demands of other programmes and initiatives specific to the needs of special schools on school development days, the number of which is the same as mainstream schools.
- The potential for the implementation of the guidance to place an additional administrative burden on schools emphasises the need for a standardised, digital proforma which facilitates accurate reporting of incidents. Post-incident reflections would benefit from EA input and emphasis placed on support for staff who have experienced injuries while responding to a child's dysregulation.

CSSC is happy to discuss this response with the Department of Education.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Mark Baker', written over a horizontal line.

Mr Mark Baker  
Chief Executive