

Mary Pugsley MBE

Director, Hair at the Academy



Behaviour Policy

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Student Behaviour Policy

1. Overview and purpose

Hair at the Academy (HATA) is committed to providing a positive, safe, inclusive and supportive alternative education environment in which every student is valued and able to learn. This policy sets out the behaviour expected of students, the support HATA will provide, and the fair and proportionate responses that may be used when behaviour falls below expectations.

HATA's approach is relational, restorative and trauma-informed: staff will maintain clear boundaries and high expectations while seeking to understand the needs, circumstances and functions of behaviour. Safeguarding and the welfare of the student and others remain paramount.

2. Aims

- To ensure students can maximise learning in a safe and secure environment.
- To promote respectful, responsible and work-ready behaviour appropriate to a salon and vocational training environment.
- To help students develop self-regulation, independence and responsibility for their own progress.
- To protect every student's right to learn without bullying, harassment, discrimination, violence or intimidation.
- To recognise and celebrate positive behaviour, effort, attendance, punctuality and achievement.
- To ensure responses to behaviour are fair, consistent, proportionate, lawful and sensitive to individual need.
- To work constructively with parents/carers, referring schools, local authorities and other professionals.

3. Scope

This policy applies to all students while attending HATA, taking part in HATA activities or placements, travelling to or from HATA where behaviour has a direct connection with the provision, and during off-site visits or community activities. It also applies to online behaviour where it affects the safety, welfare, learning or reputation of members of the HATA community.

4. Legal and statutory framework

HATA will apply this policy in accordance with the legal status of the provision and the terms of each student's placement or commissioning arrangement. Relevant legislation and national guidance include:

- [Children Act 1989 and Children Act 2004](#) - safeguarding and promoting children's welfare.
- [Education Act 1996, including section 19](#) - local authority duties concerning suitable education for children who would otherwise not receive it.
- [Equality Act 2010](#) - protection from discrimination and the duty to make reasonable adjustments for disabled students.
- [Human Rights Act 1998](#) - relevant rights including dignity, privacy and protection from inhuman or degrading treatment.

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- [Health and Safety at Work etc. Act 1974](#) - duties to protect health and safety.
- [Data Protection Act 2018 and UK GDPR](#) - lawful and secure handling of student information and behaviour records.
- [Keeping Children Safe in Education 2025 \(until 31 August 2026\) and KCSIE 2026 \(from 1 September 2026\)](#)
- [Working Together to Safeguard Children 2026](#)
- [Alternative provision: statutory guidance](#)
- [Non-school alternative provision: voluntary national standards](#)
- [Behaviour in schools: advice for headteachers and school staff](#)
- [Restrictive interventions, including the use of reasonable force, in schools \(effective from 1 April 2026\)](#)

Some Department for Education guidance above applies directly only to specified categories of schools or colleges. Where HATA is operating as non-school/unregistered alternative provision, HATA will use such guidance as relevant good practice while following the legal powers and duties that apply to its actual status and the requirements of the commissioning body.

5. HATA's behaviour principles

- Everyone has the right to feel safe, respected and able to learn.
- Behaviour is communicated and taught; students may need different levels of support to meet the same high expectations.
- Positive relationships, clear routines and recognition of success are central to behaviour support.
- Consequences are used to protect learning and safety, help students understand impact and support better choices; they are not intended to humiliate.
- Student voice will be heard. Wherever practicable, students will have an opportunity to explain what happened and contribute to repair and reintegration.
- Discriminatory, sexualised, threatening, abusive or bullying behaviour is never dismissed as 'banter'.

6. Student code of conduct and Academy expectations

Students are expected to:

1. Attend regularly, arrive on time and be ready to learn.
2. Follow reasonable instructions from staff and engage with agreed learning activities and assessments.
3. Treat students, staff, visitors, clients and members of the community with dignity, kindness and respect.
4. Allow other students to learn without interference, intimidation or disruption.

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5. Use respectful language. Swearing directed at others, discriminatory language, threats and verbal abuse are unacceptable.
6. Keep salon and learning areas clean, sterile where required, tidy and safe; use equipment only as instructed.
7. Wear appropriate black salon/work clothing and closed-toe, closed-heel footwear where required for health and safety.
8. Maintain appropriate personal hygiene for a salon environment and remove jewellery, watches or other items when required for safe practical work.
9. Hand mobile phones and connected personal devices to staff on arrival for secure storage during learning time, unless an agreed reasonable adjustment or individual plan states otherwise.
10. Use Academy technology, internet access and online platforms safely, responsibly and only for authorised purposes.
11. Respect property. Theft, deliberate damage and vandalism are prohibited.
12. Not possess or use weapons, illegal drugs, alcohol or other prohibited substances, and not attend under the influence of alcohol or illegal drugs.
13. Follow safeguarding and health and safety instructions, including rules for practical salon activities.
14. Remain on site during the learning day unless permission has been given by an authorised member of staff.
15. Behave respectfully on off-site activities and when travelling in connection with HATA.

7. Attendance and punctuality

Regular attendance and punctuality support progress, wellbeing and preparation for employment. HATA will record attendance and share information with parents/carers and the referring or commissioning organisation where appropriate and lawful. Where attendance or punctuality becomes a concern, staff will seek to identify barriers, agree support and work with the student, family and relevant professionals. Repeated lateness will be addressed through the student's key worker or tutor rather than relying solely on sanctions.

8. Mobile phones, technology and online behaviour

Students may bring a mobile phone to HATA but are expected to hand it to staff on arrival for secure storage during learning time. Use during agreed breaks may be permitted. Students must not photograph, film or record another person without permission, use devices to bully, harass or intimidate, access or distribute illegal or inappropriate material, or use social media in a way that creates a safeguarding risk or causes harm to another member of the HATA community.

Where misuse occurs, access to the device during the learning day may be restricted and parents/carers and/or the referring organisation may be contacted. Any search, confiscation or examination of a device will only take place where HATA has a lawful basis and in accordance with safeguarding, data protection and the terms of the placement. Police advice will be sought where criminal content or immediate risk is suspected.

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9. Bullying, harassment, discrimination and harmful behaviour

HATA does not tolerate bullying, victimisation, sexual harassment, sexual violence, racist, homophobic, biphobic, transphobic, sexist, disablist or other discriminatory behaviour. This includes online behaviour, sexualised comments or images, coercion, threats and prejudicial language. Reports will be taken seriously, recorded and considered through safeguarding procedures where appropriate.

Students who experience or witness harmful behaviour should tell a member of staff, their key worker or the Designated Safeguarding Lead. Support will be offered to those affected as well as appropriate intervention with the student whose behaviour has caused harm.

10. Supporting students with SEND, disability and additional needs

HATA recognises that behaviour may be affected by special educational needs and disabilities (SEND), communication needs, trauma, adverse experiences, mental health needs or other vulnerabilities. Staff will consider whether behaviour may be linked to an identified or emerging need and will make reasonable adjustments where required by the Equality Act 2010.

- adapting communication, routines, teaching approaches or the environment;
- using individual regulation, sensory or movement strategies;
- agreeing personalised behaviour or risk-management plans;
- providing key-worker support and planned breaks;
- seeking advice from the referring school, SEND professionals, health services or other agencies where appropriate.

Reasonable adjustments do not mean that unsafe or harmful behaviour is ignored. They ensure that expectations and responses are fair, accessible and proportionate.

11. Positive behaviour, recognition and A-Praise

HATA places strong emphasis on recognising positive behaviour, effort, persistence, attendance, engagement and progress. Staff should use specific praise and the learner of the month system consistently.

12. Responding to behaviour that falls below expectations

Staff responses will normally be graduated and proportionate. The response selected will depend on the behaviour, its impact, any previous incidents, safeguarding considerations, the student's needs and the requirements of the referring or commissioning organisation.

- calm reminder, redirection or restatement of the expectation;
- regulated time or a change of activity/environment;
- restorative conversation and opportunity to repair harm;
- key-worker intervention, target setting or an individual behaviour support plan;
- contact with parents/carers and/or the referring organisation;
- temporary restriction from an activity where this is necessary for safety;
- risk assessment, multi-agency review or review of the placement;

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- temporary removal from the provision or termination of the placement in serious or persistent cases, in accordance with the placement agreement and commissioning arrangements.

13. Serious incidents

The following may require an immediate safeguarding, safety or senior-management response:

- violence, attempted violence or credible threats of serious harm;
- possession or use of a weapon or an item intended to cause injury;
- possession, supply or use of illegal drugs or attendance while significantly impaired;
- sexual violence, serious sexual harassment or harmful sexual behaviour;
- serious bullying, hate incidents or discriminatory abuse;
- theft, significant deliberate damage, arson or other suspected criminal behaviour;
- behaviour creating a serious and immediate risk to the student or others.

HATA may contact parents/carers, the referring organisation, children's social care, the police or emergency services where appropriate. A safeguarding referral will be made whenever the threshold for doing so is met.

14. Physical contact, restrictive intervention and reasonable force

HATA aims to prevent situations escalating to the point where restrictive intervention is considered. De-escalation, communication, environmental changes, giving time and space, and individual regulation strategies should be used wherever safe and practicable.

The Department for Education's 'Restrictive interventions, including the use of reasonable force, in schools' guidance has applied to specified school settings since 1 April 2026. The statutory power in section 93 of the Education and Inspections Act 2006 applies to school staff and other persons whom the legislation covers; it must not be assumed to give the same power to every non-school alternative provision provider.

Relevant legislation: [Education and Inspections Act 2006, section 93](#).

Accordingly, HATA staff must only use physical intervention where there is a lawful basis, it is necessary to address an immediate safety risk, and the action is reasonable and proportionate in the circumstances. Physical intervention must never be used as punishment, to cause pain, to humiliate a student or simply to secure compliance where there is no immediate safety justification.

- Use the least restrictive option for the shortest time necessary.
- Take account of the student's age, size, SEND, disability, trauma history, communication needs and known medical risks.
- Avoid any technique that interferes with breathing, circulation or the ability to communicate distress.
- Seek assistance and call emergency services where the risk cannot be safely managed.
- After any restrictive physical intervention, check the welfare of everyone involved, offer appropriate support, inform senior leaders/DSL, parents or carers and the referring organisation as appropriate, and make a clear contemporaneous record.

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- Any injury, safeguarding concern or allegation about staff conduct must be managed under HATA's safeguarding and staff conduct procedures.
- Where a student is known to present a foreseeable risk, HATA will work with the commissioner and relevant professionals to agree an individual risk-management/support plan and any necessary staff training.

15. Searching, prohibited items and confiscation

Students must not bring weapons, illegal drugs, alcohol, stolen items or other items that present a serious safety risk onto HATA premises. HATA is not a school and will not assume statutory school search powers unless they legally apply to the provision. Staff should seek voluntary cooperation, protect immediate safety, involve a senior leader and contact parents/carers, the referring organisation or police where appropriate. Any item temporarily held must be stored, returned, transferred or disposed of lawfully and safely.

16. Removal from sessions, suspension/exclusion terminology and placement termination

HATA's existing documents use the term 'exclusion'. Because statutory school suspension and permanent exclusion procedures apply to maintained schools, academies and pupil referral units, HATA will only describe an action as a statutory suspension or permanent exclusion where those legal provisions apply to the setting.

For a non-school alternative provision placement, HATA may instead temporarily remove a student from a session/site or recommend/decide that a placement should end, according to the commissioning agreement. Such decisions will not be taken lightly. Except where immediate action is necessary for safety, HATA will investigate, hear the student's account, consider SEND/disability and safeguarding factors, review support already provided, consult the referring organisation and keep a written record.

The referring organisation and parent/carer will be informed promptly of any decision that prevents a student from attending. Responsibility for ensuring the child continues to receive suitable education remains subject to the applicable legal duties and commissioning arrangements.

17. Behaviour outside HATA

Behaviour on trips, placements and other HATA-related activities is subject to this policy. HATA may also respond to off-site or online behaviour where there is a clear connection to HATA, where it affects another student or member of staff, or where it raises a safeguarding or safety concern. Responses will be reasonable and proportionate and will take account of the circumstances.

18. Safeguarding and child-on-child abuse

Safeguarding is everyone's responsibility. Behaviour concerns may also be safeguarding concerns. Staff must not manage suspected abuse solely as a behaviour matter. Concerns about child-on-child abuse, sexual violence, sexual harassment, exploitation, criminal exploitation, radicalisation, serious violence or other risk of harm must be reported to the Designated Safeguarding Lead without delay and managed under HATA's Safeguarding and Child Protection Policy.

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19. Recording, information sharing and confidentiality

Significant behaviour incidents, actions taken and agreed support will be recorded accurately and proportionately. Information will be shared only where there is a lawful reason, including safeguarding, health and safety, education or placement management. Records will be handled in accordance with HATA's Data Protection Policy, the Data Protection Act 2018 and UK GDPR.

20. Roles and responsibilities

- The Director has overall responsibility for ensuring this policy is implemented, reviewed and aligned with HATA's legal status and commissioning arrangements.
- The Designated Safeguarding Lead ensures behaviour concerns with a safeguarding dimension are responded to appropriately.
- Staff are responsible for modelling respectful behaviour, teaching expectations, using de-escalation and reasonable adjustments, recording significant incidents and reporting safeguarding concerns.
- Key Workers provide consistent relational support, help students reflect and regulate, liaise with parents/carers and contribute to individual support and reintegration plans.
- Students are responsible for following the code of conduct, engaging with support and contributing to repair when their behaviour has affected others.
- Parents/carers and referring organisations are encouraged to work in partnership with HATA and share information that may help HATA support the student safely.

21. Complaints and review of decisions

Students and parents/carers may raise concerns about the application of this policy through HATA's complaints procedure. Where a placement decision is made jointly with, or by, a referring school or local authority, any review or appeal route under that organisation's procedures will also apply. Complaints about safeguarding must be handled under the appropriate safeguarding procedures and must not delay action needed to protect a child.

22. Related HATA policies

- Safeguarding and Child Protection Policy
- Staff Code of Conduct and Staff Behaviour Policy
- Equality / Equal Opportunities Policy
- SEND arrangements and individual support plans
- Health and Safety Policy
- Data Protection Policy
- Online Safety / Acceptable Use arrangements
- Complaints Policy
- Whistleblowing Policy

23. Monitoring and review

The Director will monitor the implementation and impact of this policy, including patterns in incidents, discrimination, bullying, restrictive intervention, attendance and placement endings. The

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policy will be reviewed at least annually and sooner where legislation, statutory guidance, HATA's legal status or local commissioning requirements change.

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