WHAT IS PHYSICAL RESTRAINT?
GUIDANCE FOR VICTORIAN GOVERNMENT SCHOOLS
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HUMAN RIGHTS APPLY TO EVERYONE

All children and young people are entitled to quality education experiences, irrespective of the education and training institution they attend, where they live or their social or economic status. *(Education and Training Reform Act 2006)*

Every day our school principals and teachers demonstrate respect and support for the learning, strengths and needs of students from diverse linguistic, cultural, religious and socioeconomic backgrounds.

In Victoria, human rights are defined in the *Victorian Charter of Human Rights and Responsibilities (the Charter)*. Under the Charter Victorian government school students have their rights protected, including the right to protection of their best interests and freedom from discrimination. Victorian Government schools are required to take active steps to make sure that those rights are being upheld.

Both State and Commonwealth anti-discrimination laws place specific obligations on Victorian Government schools to respond to behaviours of concern arising as a result of a disability in a non-discriminatory way. This is achieved by providing Victorian Government school staff with strategies to respond to those behaviours that do not involve the use of restraint.

This guidance accompanies the *15 Principles for the Reduction and Elimination of Restraint and Seclusion in Victorian Government School (15 Principles)* adopted by the Department and provides teachers, support staff, and school leaders with practical guidance for reducing the use of physical restraint in our schools in a way that is consistent with human rights and anti-discrimination legislation.

Human Rights principles underpin all areas relevant to restraint and seclusion and strongly influence both proactive strategies to prevent, minimise and eliminate behaviours of concern, and reactive strategies in response to those behaviours.
PHYSICAL RESTRAINT OF STUDENTS IN VICTORIAN GOVERNMENT SCHOOLS

Physical restraint of a student – whether there is a history of behaviour of concern or not – is not permitted within any Victorian government school – primary, secondary or specialist school – except in an emergency.

LEGAL CONTEXT

All school staff must take reasonable steps to protect students in their care and supervision from harm. When a teacher-student relationship exists, teachers have a special duty of care. Teachers are expected to take measures that are reasonable in the circumstances to protect a student under their charge from injury.

Situations requiring teachers to exercise their duty of care are the only times staff should use physical restraint.

EMERGENCY SITUATIONS

In an emergency, a decision to physically restrain a student lies with a staff member’s professional judgment. Regulation 25 of the Education and Training Reform Regulations 2017 provides for some limited lawful circumstances when physical restraint may be used. This is when a student is restrained because their behaviour poses an immediate risk to their own safety and/or to the safety of others. Such restraint must be reasonable, in that the restraint:

• is the least restrictive option in the circumstances
• is justified and proportionate
• ceases once the immediate risk of harm has passed
• is respectful of the student’s dignity
• is a “last resort”.

In the event that physical restraint is used, the student must be carefully and continuously monitored to ensure that no harm comes to the student, and that other students and staff are safe, ensuring that physical restraint never harms or restricts the breathing of a student.

The Department has a duty of care to ensure the health and safety of its staff while they are at work. Staff also have an obligation to take reasonable care for their own health and safety and that of others in the workplace. Emergency situations can be stressful which is why building staff capability and supporting school staff to engage with the student in a calm and measured way is important.
Ensuring physical restraint is only used in emergencies:
• Reduces the risk of injury to students and staff
• Adheres to duty of care responsibilities to students and staff
• Complies with legislative requirements
• Ensures students feel safe at school.

Physical restraint must never be used as punishment or discipline; as a means of coercion or retaliation; or as a convenience.

The use of physical restraint must not be included in Behaviour Support Plans or similar documents and must not be used as a routine behaviour management technique or a routine first response.

The following actions are strictly prohibited within Victorian government schools:
• prone restraint (holding a student face down) and supine restraint (holding a student face up) on the floor
• headlock
• choke hold or application of pressure to the neck, chest or joints
• ‘full or half Nelson’ (wrestling holds)
• pressing on pressure points to cause pain
• holds that cover the face
• use of any cloth or object on the face
• using a hog tied position
• straddling.
Such actions can result in serious injury or death.

Prevention and intervention
Reducing the occurrence of student behaviours of concern is more effective than merely responding to the behaviour each time it occurs.

Supporting and managing individual students with behaviours of concern is best achieved by providing individualised and targeted support planning and intervention within a positive behaviour support system and culture.

Support planning is not a linear pathway, but rather, a cycle of continuous improvement enabled by reflective staff practice. This is outlined in the behaviour support planning cycle.

The process of continuous reflection and improvement is data-driven and focused on understanding the underlying triggers and causes of behaviour from the perspective of the individual student within their school environment. This will support the selection of interventions that are directly connected to the needs and skill deficits of the student.

School-wide Positive Behaviour Support (SWPBS) provides a coherent school-wide framework that supports school communities to establish systems and processes that are focused on the prevention of student behaviours of concern. The Department is committed to supporting Victorian government schools to implement SWPBS.

For further information on SWPBS in Victoria or for support in implementing SWPBS in your school go to www.education.vic.gov.au/swpbs

Any behavioural intervention must be consistent with the Charter of Human Rights and Responsibilities Act 2006 (Victoria) and also the student’s rights to be treated with dignity and to be free from abuse.

Alternative interventions to physical restraint must be investigated, following a first incident, to try and prevent re-occurrence.

Preventing use of restraint
School leaders must take steps to demonstrate that physical restraint is only for use in an emergency through clear documentation of incidents, leadership activities, support for staff, and review of existing practices and written policies.
Leaders should:

• demonstrate commitment to early intervention and prevention through the implementation of preventative frameworks such as School-wide Positive Behaviour Support

• demonstrate commitment to a collaborative, non-punitive environment where staff can discuss challenges and emergency incidents requiring physical restraint

• ensure staff-student ratios are appropriate to safeguard staff safety and wellbeing

• encourage staff to practice self-care to prevent burnout and build resilience

• ensure staff receive supervision and mentoring, providing assurance that they have been given appropriate staff development and training

• ensure school staff receive ongoing training, and feel prepared, skilled and confident, in:
  – creating inclusive classrooms and supporting all students
  – providing personalised learning and support planning
  – managing behaviours of concern and the identification of alternative (non-restrictive) practices such as practising prevention, intervention and de-escalation strategies
  – initiating appropriate assessments for students demonstrating behaviours of concern.

• ensure physical restraint is never included in Behaviour Support Plans or similar documents; physical restraint should never be planned

**MANAGING INCIDENTS**

• foster calm interactions with students that avoid power struggles

• report incidents of physical restraint used in emergencies to elicit a regional assistance and support for the school

• use data about physical restraint used in emergencies to inform school practices, planning and setting of improvement goals

• ensure staff debrief immediately following an emergency in which physical restraint has been used, acknowledging that such incidents can be stressful, with a more formal debriefing at a later date.

School leaders should ensure staff debrief immediately following an emergency in which physical restraint has been used, acknowledging that such incidents can be traumatic.

**REPORT EQUALS SUPPORT**

<table>
<thead>
<tr>
<th>Document (CASES21/SOCS)</th>
<th>Report (Security Services Unit/EduSafe)</th>
<th>Inform (Parents/carers)</th>
<th>Support and debrief (Students/staff/witnesses)</th>
<th>Review (Strategies/advice/plans/training)</th>
</tr>
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**What to do following an incident of physical restraint**

Each incident involving the use of physical restraint must be documented in writing. Documentation of emergency incidents enables data to be collected by schools and the Department in a systemic way. Data informs policy and program support of schools.

Written records must be added to a student’s file on CASES21 or Student Online Case System (SOCS). The record should be made as soon as possible after the incident and should include:

☑ The name of the student/s and staff member/s involved

☑ Date, time and location of the incident

☑ What exactly happened (a brief factual account)

☑ Details of the emergency in which physical restraint was used

☑ The triggers for the student’s behaviour

☑ The steps taken to de-escalate and defuse the situation

☑ Why a decision was made to use physical restraint

☑ A description of how physical restraint was used

☑ How long the physical restraint lasted

☑ Names of witnesses (staff and other students)

☑ The student’s response to the physical restraint

☑ The outcome of the incident

☑ Any injuries or damage to property

☑ Details of contact with the student’s parent/carer and the conversation/s

☑ Details of any post incident support provided or organised

☑ Immediate post incident actions, such as first aid, contact with emergency services, other relevant professionals and agencies, for example, child protection, Department of Health and Human Services (DHHS)
School reports of incidents involving restraint of students will result in the Area making contact with the school

Report the incident

All incidents of physical restraint must be reported to the Department’s Security Services Unit and if a staff member has been harmed, or been put at risk of being harmed, the incident must be reported to EduSafe.

Reporting incidents of physical restraint:
- prompts behavioural intervention at a school level
- encourages support from regional staff and systemic support from the Department
- encourages school staff to improve their own practice
- facilitates access to resources
- highlights potential gaps in Department policy and support of schools
- builds better understanding of, and responsibility for, responding to local circumstances and contexts.

Inform parents/carers

Parents/carers should be notified as soon as possible following an instance in which physical restraint is used on their child.

Parents/carers should be notified of post-incident decisions about supports offered to their child.

It may be appropriate to inform the student’s parents/carers that a school has occupational health and safety responsibilities for staff and duty of care obligations to other students as well as their child when discussing the incident.

Arrange support for school staff and others impacted by the incident

Schools must consider the wellbeing of all those involved – school staff and student/s – and those that may have witnessed the incident of restraint. This may include the use of augmentative and alternative communication for non verbal students.

School staff involved in an incident of physical restraint are encouraged to contact the Employee Assistance Program (EAP) for counselling support following an incident. School leadership may decide on a case by case basis if any additional support is to be provided for staff at the school level.
School staff involved in an incident of physical restraint are encouraged to contact the Employee Assistance Program for counselling support following an incident.

**Review the incident**

Any use of physical restraint **must** trigger a review of the incident to determine whether current behavioural interventions to address behaviour that causes harm to self or others needs revision. If positive behavioural strategies are not in place, staff should develop them. It may be that the incident no further scrutiny is required if the incident is a one-off event.

Reviewers should consider whether additional information about a student is required by the school, and, if necessary seek advice. In some cases this may require the permission of the student/parent/carer to access information. Convening a Student Support Group (SSG) will assist communication and information sharing about the needs of the student, and possible support mechanisms.

School staff should reflect on whether development of a student Safety Plan and Behaviour Support Plan (BSP) is required. A BSP should be developed in consultation with the student’s parents/carers and, if appropriate, the student. This process will include considering:

- the underlying cause or purpose of the behaviour that led to the physical restraint
- the supportive practices and strategies that have worked well for the student in the past
- the drivers that led to the escalation in behaviour
- further adjustments or supports that might prevent future incidents leading to physical restraint.

Adhering to Safety and Behaviour Support Plans which identify known triggers and provide guidance on how best to respond to a student’s behaviour of concern, will alleviate staff stress and enable staff to intervene in situations promptly by problem solving in a flexible and calm way.

Consideration should be given to whether an occupational violence risk assessment is necessary. An occupational violence risk assessment checklist is available from WorkSafe or schools can contact the Department’s Occupational Health and Safety (OHS) Advisory Service.

The training needs of all school staff, not just those involved in the incident, should be reviewed.
15 Principles

1. Department policy (School Policy and Advisory Guide – Restraining of Student) restricting the use of restraint or seclusion applies to all students in Victorian government schools.

2. Physical restraint or seclusion must not be used except in situations where the student’s behaviour poses an imminent threat of physical harm or danger to self or others; where such action (i.e. to physically restrain or seclude) would be considered reasonable in all the circumstances; and where there is no less restrictive means of responding in the circumstances. Restraint or seclusion should be discontinued as soon as the immediate danger has dissipated.

3. Every effort should be made to prevent the need for the use of physical restraint or seclusion.

4. Schools should never use mechanical restraints or a drug/medication that restricts a student’s freedom of movement or to control behaviour.

5. Any behavioural intervention must be consistent with the Charter of Human Rights and Responsibilities Act 2006 and also the student’s rights to be treated with dignity and to be free from abuse.

6. Physical restraint or seclusion must never be used as punishment or discipline (e.g. placing in seclusion for non-compliant behaviour); as a means of coercion or retaliation; or as a convenience.

7. Physical restraint or seclusion should never be used in a manner that restricts a student’s breathing or harms the student.

8. Any use of physical restraint or seclusion must trigger a review and, if appropriate, a revision of behavioural strategies currently in place to address behaviour that causes harm to self or others. If positive behavioural strategies are not in place, staff should develop them.

9. If students demonstrate behaviour that causes physical harm to self or others necessitating the use of physical restraint or seclusion, strategies to address this behaviour should address the underlying cause or purpose of the behaviour.

10. Teachers, and relevant school staff should be trained regularly on the appropriate use of effective alternatives to physical restraint or seclusion, such as School-wide Positive Behaviour Support.

11. In every instance in which physical restraint or seclusion is used, the student must be carefully and continuously monitored to ensure that the physical restraint or seclusion is being used appropriately, and that the student, other students and staff are safe.

12. Parents/carers should be informed of the Department’s policy (School Policy and Advisory Guide (SPAG) – Restraining of Student) on restraint and seclusion.

13. Parents/carers should be notified as soon as possible following each instance in which physical restraint or seclusion is used with their child/student.

14. The Department will regularly review and update, as appropriate, policy regarding the use of physical restraint and seclusion.

15. Each incident involving the use of physical restraint or seclusion must be documented in writing and specific data collected to add to staff understanding of the application of the 15 Principles and to inform the review of the policy.
KEY POINTS

• Physical restraint of a student is not permitted within any Victorian government school except in an emergency situation.

• Physical restraint is the use of physical force to prevent, restrict or subdue the movement of a person’s body or part of their body.

• An emergency situation is when the behaviour of a student poses a risk to their own safety and/or to the safety of others. The physical restraint must be ‘reasonable’.

• Ensuring physical restraint is only used in emergencies:
  – Reduces the risk of injury to students and staff
  – Adheres to duty of care responsibilities to students and staff
  – Complies with legislative requirements
  – Ensures students feel safe at school.

• School staff involved in an incident of physical restraint are encouraged to contact the Employee Assistance Program for counselling support following an incident.

• School leaders should ensure staff debrief immediately following an emergency in which physical restraint has been used, acknowledging that such incidents can be traumatic.

• Report = support

• Every incident of physical restraint must be documented, reported and reviewed.

• Every incident of physical restraint involving a student must be discussed with the parents/carers of the student as soon as possible.

• Everyone involved in the incident must receive support, those involved and witnesses.
TWO PRACTICE SCENARIOS

SCENARIO 1
A group of Year 5 students go on an excursion. One of the students attending the excursion is Jonah. Jonah has a red stress ball that he likes to take with him everywhere he goes.

As he is getting off the bus, Jonah drops his red ball, and it rolls onto the road. Jonah starts to run after his ball into oncoming traffic. Mr McGovern, a Year 5 teacher, sees Jonah start to run towards the road, and quickly lunges towards Jonah, grabs him around the body, and forcefully pulls him back towards the footpath. When they are back on the footpath, Mr McGovern lets go of Jonah, and Jonah immediately starts crying and says to the other teachers that ‘Mr McGovern hurt me’.

Is this a lawful use of physical restraint?
Yes. In accordance with their duty of care, Regulation 25 of the Education and Training Reform Regulations 2007 and the Department’s Restraint of Students policy, school staff may lawfully use physical restraint on a student when it is immediately required to protect the safety of the student or any other person, noting that:

• for physical restraint to be immediately required, there should be no less restrictive action that could be taken to avert the danger in the circumstances;
• staff should use the minimum force needed to protect against the danger of harm; and
• staff should apply the physical restraint for the minimum duration required and remove it once the danger has passed.

Mr McGovern grabbed Jonah because he was required to do so to protect Jonah’s safety. He used the minimum force necessary to get Jonah off the road and protect him against harm. He let go of Jonah has soon as he was out of danger. On this basis, Mr McGovern’s use of physical restraint was lawful.

SCENARIO 2
John’s parents have told school staff that when he becomes anxious he needs to be held tightly and prevented from running. May the school do this?

No. Request from parents/carers for physical restraint must not be agreed to, or included in a Behaviour Management Plan.
FREQUENTLY ASKED QUESTIONS

What does Regulation 25 of the Education and Training Reform Regulations 2017 (Victoria) actually say?

“Restraint from danger: A member of the staff of a government school may take any reasonable action that is immediately required to restrain a student of the school from acts or behaviour dangerous to the member of staff, the student or any other person.

Restraint should not be used in situations where:

• there is no immediate risk of harm to the student or any other person;
• there are reasonable alternatives available to avoid the risk of harm; and
• the acts or behaviour are not dangerous to the student or to another person.”

Would physical restraint be justified if a student made a verbal threat?

A verbal threat from a student would not usually be considered an imminent threat of physical harm. However if a student is verbally threatening to use an implement to harm someone (for instance, hit someone with a cricket bat) and is poised holding the implement then intervention might be justified. Where a student is making verbal threats but the staff member does not believe there is a risk of imminent harm, the staff member should still take appropriate action but such action should not include restraint.

Would physical restraint be justified if a student was graffitiiing a school building?

No. If there is only damage to property and not physical harm or danger to the student (e.g. self-harm) or to another person then physical restraint would not be justified in this situation. Other de-escalation and redirection strategies should be attempted.

If a student is breaking windows, would physical restraint be justified?

No, if the breaking of windows is a contained incident. However, if a student or another person (e.g. staff or another student) are at risk of physical harm then physical restraint would be justified.

May a student running onto a road be physically restrained?

Yes. A staff member should prevent a student from running onto a road in front of cars, for instance, by grabbing one of the student’s arms and releasing it as soon as the danger has passed. The least restrictive form of physical restraint must be used for the minimum time possible. The physical restraint must cease as soon as the immediate danger for the student or others is averted.
May a student who is running away from school be physically restrained?

A student cannot be physically restrained except where their behaviour poses a risk to their own safety and/or to the safety of others, the physical restraint is reasonable and there is no less restrictive means of responding to the circumstances. If these criteria are met the physical restraint must be discontinued as soon as the immediate danger has passed.

Often a student absconding from school will not meet these conditions because:
- there may not be an imminent risk of physical harm
- physically restraining the student might not be considered reasonable in the circumstances
- there may be less restrictive ways of responding.

How should schools respond to students physically fighting?

School staff have a duty to protect the safety of all students (including a student at risk of causing physical harm to self or others), themselves and other staff.

If the student/s involved in physical fighting have Behaviour Support Plans or Safety Plans, appropriate strategies should be outlined in those documents and all staff made aware of them. Staff should follow the strategies outlined in the plan/s.

If the student/s have no history of behaviours of concern, general de-escalation strategies should be used. Some recognised general de-escalation strategies include:
- keeping verbal instructions simple and minimal, using a calm tone of voice and clear, direct language or student’s preferred method of communication (focusing on the behaviours you want them to display rather than the ones you don’t)
- reinforce the desired behaviour or positive alternate behaviours when demonstrated
- using active listening techniques (e.g. leaps - listen, empathise, ask questions, paraphrase and summarise actions for moving forward)
- acknowledging the student’s underlying or expressed emotion (e.g. anger/distress)
- providing take-up time for students to process verbal prompts or requests
- problem solving with the student to address the cause of escalation if safe to do so
- adopting a non-threatening body stance and body language (open, relaxed with hands down)
- allowing adequate personal space
- using non-verbal cues
- providing options (within limits) to help the student feel they are still in control of their decisions
- allowing the student to access an alternative space with school staff that is less stimulating or removes access to the behaviour triggers in order to problem solve or regulate. (Note: students must never be forcibly removed or coerced to an alternate space)
Where de-escalation is unsuccessful or there is no opportunity for de-escalation (e.g. staff are alerted to a fight on the school yard) staff need to use their professional judgment as to how best to respond.

If staff determine it to be necessary to intervene in a fight their actions must be reasonable and proportionate to the situation.

What ‘protective physical interventions’ are allowed?

Protective physical interventions are not physical restraint because they allow a student to move freely away whilst the student’s:

- physical actions are blocked, deflected or redirected
- grip is disengaged.

It is important to report such protective physical interventions as the student’s behaviour may escalate over time and reporting provides the school and the student with a record of the interventions that have taken place.

What are preventative practices?

School staff should always be aware of where their body is positioned when interacting with a student, even if the student is not displaying behaviours of concern.

Staff should be trained to recognise when a student’s behaviour is escalating and to have a planned response. This includes identifying triggers and being attentive to early signs of escalation so that effective de-escalation strategies can be implemented.

Supporting and managing individual students with behaviours of concern is best achieved by:

- building a trusting relationship
- knowing the student and recognising indicators of escalating behaviour such as:
  - sudden changes in expression, physical activity or posture
  - dramatic increases or changes in the volume or tone of voice
  - silences, breathlessness or sighs
  - challenges or resistance to authority
- withdrawal from engagement in normal interactions and activities
- verbal threats to harm themselves, others or property;
- as well as by
  - providing a positive and stimulating learning environment which is responsive to diverse student needs
  - supporting the home environment to align with school routines, rules and expectations
  - providing individualised and targeted support planning and interventions that are regularly evaluated and modified where necessary
  - identifying, removing and managing risks
  - using effective communication strategies to prevent or de-escalate behaviours of concern
  - providing a school-wide positive behavioural support system and culture
  - adapting the school environment to support student needs, sensory preferences, positive relationships and effective communication, ensuring that students:
    - feel safe which will help to prevent crises
    - have access to quiet space and privacy
    - have some level of control over, or choice regarding, their environment
    - have access to communication aids to improve receptive and expressive communication with others if appropriate
- developing more meaningful tasks and enjoyable activities
- developing skills/replacement behaviours training plans
- seeking the support of other relevant professionals
- training staff in specialised techniques (e.g. augmentative and alternative communication or the use of visual supports).

What kind of support follows a report?

Following a report of restraint or seclusion the Area will contact the school to make sure that everyone is ok and to review what supports are needed on an individual basis.
WORKING WITH PROVIDERS OF PROTECTIVE PRACTICES

External service providers can be beneficial to school communities and can complement teaching and learning.

External providers can provide:
• access to additional resources and advice and new ideas
• professional learning opportunities for staff
• additional support for students and families.

However, it is important that schools:
• carefully assess the need for such providers. Do school staff require support to feel prepared, skilled and confident, in:
  – providing personalised learning and support planning
  – managing behaviours of concern and the identification of alternative (non-restrictive) practices such as practising prevention, intervention and de-escalation strategies
  – initiating appropriate assessments for students demonstrating behaviours of concern.
• consider whether the provider is the right fit for the school community and its ability to deliver a service within Victorian legislation
• research the evidence base and quality of the service, including existing professional standards for instructors/trainers,
• research the providers accreditations, affiliations of certifications of curriculum’s, insurance and liability cover
• research whether there have been claims against the organisation in the past five years or standing
• consider relevant Department policies and existing resources.

THE DEPARTMENT DOES NOT ENDORSE PROVIDERS THAT DEMONSTRATE TECHNIQUES FOR PHYSICAL RESTRAINT.

There are a number of principles, however, to help schools to identify training programs that are consistent with DET policy.

The principles are that:
1. training activities and handout material must not contain content that is contrary to Department guidelines and policy, specifically, that restraint is not to be depicted, nor demonstrated, and
2. there is a strong focus on prevention, and
3. there is an evidence-based framework underpinning the training, and
4. information about good communication skills (verbal and non-verbal) is provided, and
5. strategies for prevention and de-escalation are included, and
6. protective physical practice strategies focus on avoiding harm to self and others, and on the care and safety for all concerned, and
7. strategies for providing support after an incident are provided.
FOR MORE INFORMATION

Student behaviours of concern

**Student Behaviour:**

**Engagement Strategies and Support for Individual Students:**

**Engagement Support for Specific Groups of Students:**

**Managing Challenging Behaviours Professional Learning:**

**School-Wide Positive Behaviour Support:**

**School Policy and Advisory Guide – Restraint of Student:**

**The Principles for Reduction and Elimination of Restraint and Seclusion in Victorian Government Schools:**

**Student Support Services:**

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**Reporting**

**Reporting Incidents and Hazards on eduSafe:**

**Security Services:**

**Employee Safety and Support Services, OHS Advisory Service:**
http://www.education.vic.gov.au/hrweb/safetyhw/Pages/employeeservices.aspx#link4

**Employee Safety and Support Services, Employee Assistance Program, including Manager Assist:**
http://www.education.vic.gov.au/hrweb/safetyhw/Pages/employeeservices.aspx#link4

**WorkSafe Notification:**
FOR FURTHER READING


Association for Behavior Analysis International, Statement on Restraint and Seclusion, 2010


Huckshorn, K, Six Core Strategies for Reducing Seclusion and Restraint Use, NASMHPD, Revised 2006


Melbourne Social Equity Institute, Model laws to regulate the use of restraint on persons with disabilities, Australian Research Council Discovery project, University of Melbourne

Melbourne Social Equity Institute, Seclusion and Restraint Project: Report, University of Melbourne, 2014

Paterson, B, How corrupted cultures lead to abuse of restraint interventions, Learning Disability Practice, Volume 14, Number 7, 24 September 2011


State Government of Victoria, Disability Act 2006

http://www.education.vic.gov.au