

NEO — Behaviour and Regulation Policy

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NEO BY NUDGE EDUCATION

Behaviour and Regulation Policy Nudge Education Online

Policy Owner	Designated Safeguarding Lead (DSL), countersigned by Director, NEO & Head of School
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Operating Company	Nudge Education Ltd (Company Number 10192753)
Proprietor	Diego Melo
Accreditation Route	Online Education Accreditation Scheme (OEAS) — accreditation in progress

This policy applies to all learners, staff, practitioners, contractors, volunteers and visitors of Nudge Education Online (NEO). NEO is a fully online alternative provision for learners aged 11–18, operated by Nudge Education Ltd. NEO is not a DfE-registered independent school and is not subject to Independent Schools Inspectorate (ISI) inspection. NEO is pursuing OEAS accreditation only.

1. Statement of Intent

At Nudge Education Online (NEO), behaviour is understood as communication, not defiance. Every action tells a story about need, safety, and connection. The NEO role is to listen before labelling, support before sanctioning, and repair

before removing. This policy affirms that: All young people want to belong, and behaviour improves through relationship, not fear. Every learner can grow when met with empathy, structure, and co-regulation. Inclusion and psychological safety are non-negotiable foundations for learning. Restorative practice replaces punishment; curiosity replaces blame. Exclusion from learning is never a first response — it is a last resort following graduated, relational support. Many NEO learners have experienced emotionally based school non-attendance (EBSNA), disrupted education, trauma, or unmet SEND. Behaviour responses reflect these realities. NEO is built on a relational, trauma-informed, neurodivergent-affirming pedagogy grounded in six Cornerstones: Connection, Movement, Creativity, Reflection, Rest, and Nutrition. This policy reflects those values in every aspect of how NEO responds to behaviour.

2. Scope

This policy applies to all staff, practitioners, contractors, volunteers, governors, learners, and families associated with NEO. It must be read alongside the NEO Child Protection and Safeguarding Policy, Online Safety and Acceptable Use Policy, SEND Policy, Data Protection, Confidentiality and Privacy Policy, and Complaints Procedure.

3. Legal Framework

This policy complies with the following legislation and guidance: Education Act 1996 Education Act 2002 Education and Inspections Act 2006 Equality Act 2010 SEND Code of Practice 2015 Keeping Children Safe in Education 2026 (KCSIE) Behaviour in Schools (DfE, 2024) — used as a reference framework where applicable to alternative provision Suspension and Permanent Exclusion from Maintained Schools, Academies and Pupil Referral Units (DfE, 2023) — used as reference framework Online Safety Act 2023 UK GDPR and the Data Protection Act 2018 ICO Children's Code (Age Appropriate Design Code) OEAS accreditation criteria NEO is not a DfE-registered independent school and is not subject to ISI inspection. NEO is pursuing OEAS accreditation only. Maintained-sector guidance is used as a reference framework and adapted for an online alternative provision context.

4. Key Definitions

Relational rupture: A breakdown in connection that causes distress or disruption to learning or relationships. Repair: The process of restoring trust and safety through dialogue, reflection, and collaborative problem-solving. Low-level behaviours: Signs of dysregulation such as distraction, withdrawal, lateness, or disengagement from a session. Serious behaviours: Actions causing harm, discrimination, or significant disruption, managed within safeguarding and restorative frameworks. EBSNA: Emotionally based school non-attendance. Used in place of "school avoidance" or "school refusal". Reflects the relational, trauma-informed framing of NEO. All behaviour is reviewed through a neurodevelopmental and sensory lens before any response is determined.

5. Roles and Responsibilities

Role	Responsibility
Proprietor	Named accountable person under OEAS; champions inclusion, dignity, and trauma-informed practice; reviews this policy annually; scrutinises data relating to behaviour, temporary removals, and wellbeing; ensures approaches are consistent with OEAS criteria.
Director, NEO & Head of School	Operational oversight of the policy; quality-assures patterns and responses; liaises with Proprietor, DSL, and SENCo; countersigns this policy alongside the DSL.
Designated Safeguarding Lead (DSL)	Lead relational regulation framework; provides training and reflective supervision; oversees the behaviour log; liaises with families, commissioners, and external agencies. Owner of this policy.
SEnCo	Ensures reasonable adjustments are in place; advises on sensory and cognitive needs; contributes

Role	Responsibility
	to termly review of patterns.
Qualified subject-specialist teachers	Deliver live lessons; model respectful communication; anticipate triggers and design sessions that reduce cognitive and sensory overload; record behaviour concerns promptly and factually.
Named practitioners (mentors)	Single point of contact for learner and family; use relational check-ins rather than reprimands; convene co-designed agreements; engage families in shared planning when dysregulation persists. Practitioners do not deliver live lessons.
Learners	Practise kindness, self-advocacy, and respectful communication; communicate when support, space, or adjustment is needed; contribute to the NEO Code of Respect.
Parents and carers	Support regulation and readiness for learning; communicate contextual changes or emerging needs promptly; reinforce NEO values; engage constructively with co-designed agreements and restorative processes.

6. Staff Induction, Development, and Support

All staff and practitioners receive onboarding in NEO's trauma-informed, neurodivergent-affirming, and attachment-aware approaches. Continuous professional development includes: Co-regulation and relational approaches to behaviour Executive-function scaffolding for online learning Understanding autism, ADHD, and other neurodevelopmental profiles Understanding EBSNA and re-engagement approaches Restorative conferencing and narrative repair

Online safety, Prevent duty, and mandatory reporting Compassion fatigue awareness and staff wellbeing Reflective supervision is offered termly or as needed. Staff are supported to approach behaviour with curiosity and confidence, not anxiety or blame.

7. Supporting Social, Emotional, and Mental Health

NEO integrates emotional literacy into every aspect of the curriculum and school culture: Daily wellbeing or sensory check-ins at the start of live sessions. Access to regulation strategies and digital calm spaces within the online environment. Emotion coaching embedded in feedback and pastoral interactions. Flexible scheduling and sensory accommodations to support individual needs. Signposting to external mental health services where appropriate.

8. Managing Behaviour Through Relationship

NEO's approach is proactive, preventative, and personalised. The hierarchy of response is: Connection before correction — noticing distress early and responding with attunement. Co-regulation — lending calm when learners cannot find their own. Restoration — repairing trust and re-establishing safety after rupture. Reflection — helping learners understand impact and choose next steps. No response will shame, isolate, or humiliate a learner.

9. Key Practices

9.1 Co-Designed Agreements

Co-designed agreements are relational commitments developed collaboratively between the learner, their named practitioner, and — where appropriate — the parent or carer. They describe what helps the learner feel safe, calm, and ready to learn, and outline shared expectations for communication, participation, and support. Agreements are reviewed regularly and adapted when needs or circumstances change.

9.2 Restorative Reflection

Restorative reflection is used when an incident disrupts learning or relationships. The purpose is to repair, not to punish. During restorative reflection, the learner is guided to explore: What happened What they were feeling or needing The impact on others What can be done differently next time A practitioner or pastoral staff member facilitates the process. Notes are recorded in line with safeguarding procedures.

9.3 Temporary Removal from a Session

If a learner's behaviour compromises safety or learning and other co-regulation strategies have been unsuccessful, the teacher may temporarily remove the learner from the live session. This action is a safety measure, not a sanction, and is always followed by a restorative reflection before the next session. The DSL, the named practitioner, and the parent or carer are notified whenever a removal occurs.

10. Digital Etiquette

The NEO online learning environment (Google Classroom, Google Meet, and Google Workspace) is a learning environment governed by the same principles of respect and inclusion as any physical classroom.

Expectations

Chat use: keep chat relevant to learning. Avoid spamming, off-topic comments, or use of chat to undermine others. Camera and microphone: learners may choose whether to appear on camera but should signal engagement respectfully. Microphones should be muted when not speaking. Tone: written messages should be kind, inclusive, and mindful. Sarcasm, teasing, or coded language that targets others is not acceptable. Platform norms: only official NEO channels are used for school communication. Private messaging between staff and learners outside sanctioned NEO platforms is not permitted. Breaches of these expectations are addressed using the tiered response below.

11. Tiered Response for Online Behaviour

All tiers prioritise understanding and repair over punishment.

Tier	Response	Typical Examples	Follow-Up
1 — Gentle Reminder	Teacher gives a verbal or chat reminder using calm, relational language.	Off-topic chat; minor distraction; camera or mic issues.	Noted informally.
2 — 1:1 Discussion	Named practitioner meets the learner individually to review the co-designed agreement and explore what support is needed.	Repeated chat misuse; unkind tone; disengagement.	DSL notified if a pattern emerges.
3 — Temporary Removal	Learner removed from the session for the remainder; restorative reflection arranged before next session.	Persistent disruption; inappropriate comments; behaviour affecting others' learning.	Logged by the DSL; parent or carer informed.
4 — Restorative Meeting	Facilitated by the DSL or pastoral lead with the learner, parent or carer, and commissioner if applicable.	Ongoing moderate incidents or behaviour causing harm to others.	Actions recorded and shared with all parties.

Tier	Response	Typical Examples	Follow-Up
5 — Multi-Agency Review	DSL convenes a multi-agency meeting to decide next steps, which may include adjusted provision or alternative placement.	Repeated or serious breaches; sharing harmful content; behaviour posing safeguarding risk.	Formal report completed and shared.

12. Preventing Harmful Content Online

NEO maintains safe digital spaces through: Platform moderation — only approved, age-appropriate platforms are used. Session recording and monitoring — recordings may be reviewed for safeguarding and quality assurance in line with the Online Safety and Acceptable Use Policy and the Data Protection, Confidentiality and Privacy Policy. Filtering and supervision — inappropriate content is blocked and reported. Staff training — all teachers and practitioners are trained in online safety and the Prevent Duty. Immediate reporting — any harmful, sexualised, extremist, or discriminatory content triggers DSL escalation and, where appropriate, LADO contact.

13. Reporting, Recording, and Liaison

Low-level concerns (for example, minor disruptions) are logged internally and monitored for patterns. Serious or repeated behaviour is reported to the DSL within 24 hours. The DSL informs the parent or carer and, where applicable, the referring school or commissioner, and convenes a review meeting when behaviour is persistent or escalates. All outcomes are documented and shared with relevant parties within five working days. All records are held in line with the NEO Data Protection, Confidentiality and Privacy Policy and the ICO Children's Code.

14. Behaviour Curriculum

NEO explicitly teaches the skills that underpin positive behaviour and self-regulation: Self-awareness and self-advocacy Understanding of sensory and emotional states Communication and boundary-setting skills Repair and reconciliation practices Collective responsibility and care for community These skills are woven into RSHE, pastoral sessions, and day-to-day interactions rather than delivered as standalone lessons.

15. De-escalation and Containment

Temporary removal from a shared online space occurs only when: Immediate safety is at risk. Regulation is impossible in the moment. Learning cannot continue for others. A supervised calm check-in (via a separate Google Meet call or phone call with a practitioner or pastoral lead) is used supportively, never punitively. Staff use non-confrontational language and maintain connection throughout.

16. Sexual Harassment, Abuse, and Discrimination

NEO has zero tolerance for all forms of harassment, sexual violence, or discriminatory conduct. All concerns are treated as safeguarding matters and managed in line with the NEO Child Protection and Safeguarding Policy. Support is trauma-informed, survivor-centred, and proportionate.

17. Effective Lesson Design

Live lessons are structured to reduce anxiety and executive-function load: Predictable routines and visual schedules shared at the start of each session. Clear transitions and countdowns between activities. Flexible pacing and movement or rest breaks. Assistive technology and multimodal expression (voice, text, image). Scaffolded language and expectations. Reflection time at the end of sessions.

18. The NEO Code of Respect

The NEO Code of Respect is co-developed with learners and reviewed annually: Be kind, always. Take a breath before reacting. Ask for a break when you need one. Try, pause, and try again. Respect others' space, time, and

privacy. Share ideas and listen with curiosity. Celebrate your growth. Solve problems together.

19. Recognition and Affirmation

Celebrate effort, courage, and growth — not mere compliance. Offer descriptive, strength-based feedback that names what the learner did well. Encourage peer-to-peer recognition and gratitude practices. Link privileges or opportunities to responsibility and contribution, not control.

20. Data Collection and Evaluation

Behaviour and regulation data is logged and analysed termly. Patterns are explored through reflective dialogue, not punishment matrices. Feedback from learners, families, and commissioners informs ongoing development. Data is reviewed by the DSL and SENCo to identify systemic triggers, inequities, or gaps in support. All records are processed in line with UK GDPR, the Data Protection Act 2018, and the ICO Children's Code.

21. Monitoring and Review

This policy is reviewed annually by the Proprietor, the Director / Head of School, and the DSL. Learner, staff, and family feedback directly inform updates. Findings feed into staff training, curriculum design, and wellbeing planning. Review cadence may increase during the initial period, subject to review according to the growth rate of the organisation.

Addendum: Restrictive Interventions and Exclusions

A1. Restrictive Physical Interventions

NEO operates as a fully online alternative provision. Restrictive physical interventions are not used. Where NEO hosts in-person enrichment events, any handling, de-escalation, or safeguarding response follows the event-specific risk assessment and KCSIE 2026 obligations.

A2. Sanctions

NEO emphasises restorative and relational responses. Where sanctions are necessary, they may include reflective conversations, restorative meetings, or structured support agreements. Sanctions are never humiliating, discriminatory, or applied without consideration of SEND, trauma history, or individual circumstances.

A3. Temporary Removal and Exclusions

Permanent exclusion is not part of NEO's standard provision. Temporary withdrawal from live sessions may occur if behaviour presents a risk to safety or prevents learning for others. This is used as a safety measure, not a sanction. All temporary removals are logged, reviewed by the DSL, and communicated to parents or carers and, where relevant, to referring schools, commissioners, or local authorities. Where a placement is no longer safe or sustainable, exit is managed through a multi-agency review with clear transition planning, not via summary exclusion.

A4. Monitoring

Termly DSL-led review of behaviour logs and any sanctions or temporary removals applied. Annual report to the Proprietor to ensure proportionality, equity, and alignment with KCSIE 2026 and OEAS accreditation criteria.

Related Policies

This policy should be read alongside: NEO Child Protection and Safeguarding Policy NEO Online Safety and Acceptable Use Policy NEO SEND Policy NEO Equal Opportunities, Equality and Diversity Policy NEO Data Protection, Confidentiality and Privacy Policy NEO Admissions Policy NEO Complaints Procedure NEO Teaching and Learning Policy **NEO Terms of Business (Commissioned Placements)** **NEO Terms and Conditions for Parents and Carers**

Document Control

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