



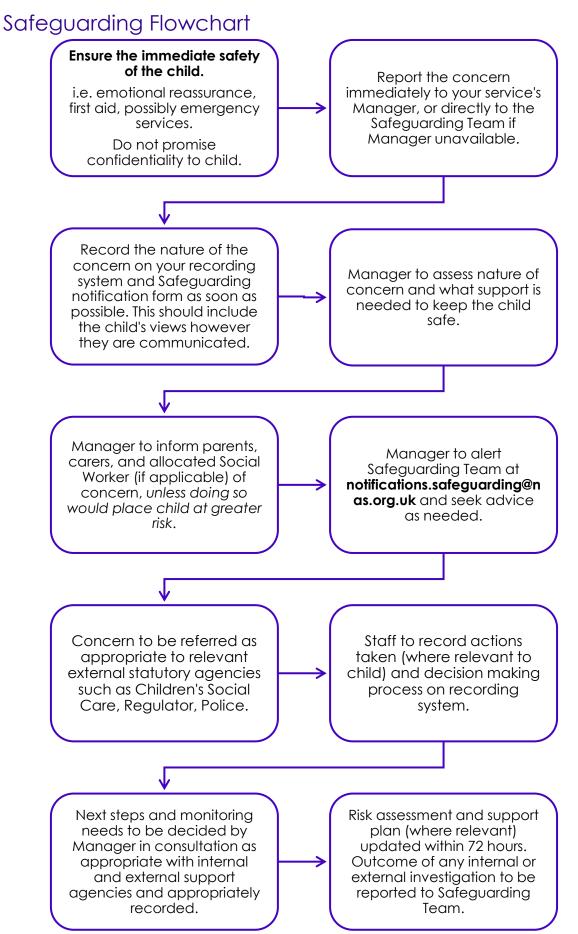
NAS Safeguarding Children and Young People (Child Protection) Procedure – SO-0188

Please note this policy is only for use in National Autistic Society Children and Young People's Services that <u>are not schools</u>. For safeguarding policies relating to National Autistic Society schools, please refer to SharePoint.

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Recognising Child Abuse

Recognising child abuse is not easy and it is not the responsibility of NAS staff and volunteers to decide whether or not child abuse has taken place or if a child is at risk of "significant harm". However, staff and volunteers do have a responsibility to act if they have a concern about a child's welfare or safety.

All staff will be aware of the indicators of abuse and neglect. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the Safeguarding Team. All staff will be aware that safeguarding incidents and/or behaviours can be associated with factors outside of the service and/or can occur between children outside of these environments; this includes being aware that children can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a child being identified as at potential risk of abuse and, in all cases, will speak to the Safeguarding Advisor for Children and Young People if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

Concerns of Abuse

Staff and volunteer concerns about a child being abused may arise through various factors. These include:

- a child may tell them
- information disclosed by a parent or carer
- someone else might report that a child has told them or that they strongly believe that a child has been or is being abused
- a child might show signs of physical injury or neglect for which there appears to be no satisfactory explanation
- a child's behaviour may indicate to them that it is likely that he/she is being/has been abused
- observing one child abusing another
- a child having contact with a person who may pose a risk to them

Response to Concerns About Child Abuse and Risk of Harm

It is very important that there are procedures in place to seek to ensure a speedy and effective response for dealing with concerns about the abuse or neglect of children.

Under no circumstances should anyone within the NAS service undertake an investigation into concerns that a child has been abused, or is at risk of being abused. This is the role of the statutory services (Social Care/Police) and any concerns or worries that staff or volunteers may have should be passed to the Service Manager and Safeguarding Team.





Once statutory services have completed their investigations, and depending on the nature of the incident or concern, an internal NAS safeguarding investigation may also be required.

Recognise	 We must all be able to recognise the signs of abuse and take safeguarding concerns seriously
Respond	 When we receive a concern we must respond appropriately and gather the information needed
Record	 We must record all relevant information and ensure that the information is recorded with the Safeguarding Team
Report	 Where we have any safeguarding concerns we must report to the appropriate authority such as the local authority or Police
Do Not Investigate	 It is not our job to investigate potential child abuse – that can only be done by the local authority or Police. Where an internal investigation (such as into allegations about staff) needs to take place, this must be sanctioned by them first so as not to interfere with their investigations.

Failure by a member of staff to report actual or reasonably suspected abuse of a child will be treated as a disciplinary offence.

Disclosures from Children

Support for Children

The child who may have been harmed needs to be believed and;

- to talk or communicate at their own pace
- to be heard
- to be supported

When a child or young person discloses that he or she has been abused or is at risk of abuse, victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment. Staff must provide immediate support and comfort and to assist in protecting the child from further abuse:

- Find a place to talk where there are no physical barriers between you and the child.
- Be on the same eye level as the child.
- Don't interrogate or interview the child.
- Be tactful. Choose your words carefully, do not be judgmental about the child or the alleged abuser. Listen to the child. Do not project or assume anything. Let the child tell his/her own story.
- Find out what the child wants from you. A child may ask you to promise not to tell anyone. Be honest about what you are able to do for the child and that you cannot promise not to tell anyone if you suspect harm or abuse.
- Be calm; reactions of disgust, fear, anger, etc., may confuse or scare a child.





- Assess the urgency of the situation. Is the child in immediate danger? Safety needs may make a difference in your response.
- Confirm the child's feelings. Let them know that it is okay to be scared, confused, sad, or however he / she is feeling.
- Believe the child and be supportive.
- Assure the child that you care. Some children will think you may not like them anymore if they tell you what happened. Let them know that he/ she is not to blame.
- Tell the child it is not their fault. Many children will think that the abuse happened because of something they did or did not do. Do not over dramatise.
- Tell the child you are glad she/he told you.
- Tell the child you will try to get some help.
- Let the child know what you will do and give them some idea of the timeframes involved. This will help build a sense of trust, and they will not be surprised when they finds out that you told someone. It will also help to manage their expectations about how quickly things may happen.
- Tell the child you need to tell someone whose job it is to help with these kinds of problems

Disclosures from Third Parties

Parents or carers may disclose safeguarding concerns about their child when accessing NAS services for support. This could be regarding abuse or trauma that their child is experiencing/has experienced from other adults, educational settings, or in the community. Disclosures from parents and carers will be followed up using the same procedure as any abuse. The Safeguarding Team can support in identifying appropriate support services and signposting for the family.

Recording Events

It is important that an accurate record of all events surrounding the disclosure or suspected abuse is kept, stating the facts, times, explanations and action taken. It is vital that when a disclosure is made to a member of staff or volunteer the person:

- is non-judgmental.
- does not coach or ask leading questions
- makes notes of the conversation as soon as possible after the event.

All safeguarding records are stored securely, whether paper based or electronic.

That the NAS internal processes for reporting safeguarding cases must be followed, using the correct forms with all sections of the forms completed.

Records should include:

- a clear, factual and comprehensive summary of the concern.
- details of how the concern was followed up;
- details of any actions taken, decisions reached and the outcomes
- all records must include accurate times, dates, names of people and roles of people





- witness statements may be required for records, these should be taken as soon as possible following an incident or disclosure and should be signed and dated.
- body maps should be used to record any physical injuries. These should be signed and dated.

Staff should remember the key principles of record keeping:

- **Be clear.** Is the record understandable? Would someone who does not know the child, the service, or the situation understand the concerns?
- Highlight the key concern. Do not bury the significant information in long text.
- **Be factual.** Staff's opinions should not be included. Records should not paraphrase disclosures from children or adults they should record exactly what they said or clearly state that it
- This is the child's record. Do not write anything that you would not want the child, family member, or anyone else to read.

Confidentiality

Confidentiality cannot be assured, as depending on the disclosure and individual concerned, information may need to be shared internally, with the NAS Safeguarding Team and with other agencies. This could include the Police and Local Authority. However, information will only be shared on a need to know basis, and the person making the disclosure should be reassured that the information they have given will be treated within best practice codes of conduct for confidentiality.

Reporting and Referral

Staff have a duty to share any concerns raised about a child with the relevant person within the Children's Social Services Team where the service is based. All information will be shared confidentially and in the appropriate format in line with the NAS Data Protection Policy (IGP-02) and the Local Safeguarding Children Partnership / Children's Social Services.

Staff should liaise with the appropriate safeguarding partners and work with other agencies.

When a referral is made to the local authority, the staff member must share this with the Safeguarding Team along with a copy of the completed referral document to the Local Authority, or a screenshot of the form if it is an online portal.

Reporting Concerns in England

In England, people working with children are expected to report concerns about a child's welfare to the relevant agencies.

The key statutory guidance is Working Together to Safeguard Children (Department for Education, 2018). This states:

- everyone who works with children has a responsibility for keeping them safe
- everyone who comes into contact with children and families has a role to play in sharing information and identifying concerns.





It is **mandatory** for all regulated health and social care professionals and teachers in England to report 'known cases' of female genital mutilation (FGM) in under 18s to the Police (Home Office, 2016).

If you think a child is in immediate danger, contact the Police on 999. If you're worried about a child but they are not in immediate danger, you should share your concerns.

- Contact the Safeguarding Team for advice and decision making
- Contact the Children's Services (Child Protection) of the local authority the child lives in.
- If a crime has been or may have been committed, consideration should be given to contacting the Police.

Working Together to Safeguard Children states that local authority children's services should give feedback to anyone who has made a child protection referral to them on the decisions they have taken (Department for Education, 2018).

Reporting Concerns in Wales

Section 130 of the <u>Social Services and Well-being (Wales) Act 2014</u> requires "relevant partners" of a local authority to inform the local authority if they have reasonable cause to suspect a child is at risk of experiencing abuse, neglect or other types of harm. This includes people who work for the local authority such as teachers and social work practitioners, health practitioners, the Police, probation services and others.

It is **mandatory** for all regulated health and social care professionals and teachers in Wales to report 'known cases' of <u>female genital mutilation (FGM)</u> in under 18s to the Police (Home Office, 2016).

If you think a child is in immediate danger, contact the Police on 999. If you're worried about a child but they are not in immediate danger, you should share your concerns.

- Contact the Safeguarding Team for advice and decision making
- Contact the Children's Services (Child Protection) of the local authority the child lives in.
- If a crime has been or may have been committed, consideration should be given to contacting the Police.

Reporting Concerns in Northern Ireland

Guidance on reporting safeguarding concerns in Northern Ireland can be found in <u>Cooperating to safeguard children and young people in Northern Ireland (2017)</u>. (This is augmented by more detailed operation guidance contained in the <u>SBNI Core</u> <u>Policy and Procedures (2018)</u>). Chapter six contains information on raising concerns and making referrals to the relevant agencies.

If you think a child is in immediate danger, contact the Police on 999. If you're worried about a child but they are not in immediate danger, you should share your concerns.

 Contact the Health and Social Care Trust (HSCT) Gateway Services team of the area the child lives in. In circumstances that are not an emergency, the <u>HSCT</u>





<u>gateway services team</u> is the first point of contact for all new referrals to children's social services.

• Contact the Police Service of Northern Ireland (PSNI). The Police can make an emergency protective response if there is an immediate concern about the safety of a child. Not reporting a relevant offence to the Police, including those against children, is an offence in Northern Ireland.

Reporting Concerns in Scotland

In Scotland, there is no legal requirement to report concerns about a child's welfare. However, section 2.1 of the National Guidance for Child Protection states that all agencies have a responsibility to recognise and actively consider potential risks to a child, irrespective of whether the child is the main focus of their involvement (Scottish Government, 2021b).

If you think a child is in immediate danger, contact the Police on 999. If you're worried about a child but they are not in immediate danger, you should share your concerns.

- Contact your local children's social work team. Their contact details can be found on the website for the local authority the child lives in.
- Contact the local Children's Reporter. Local, independent officials can decide if any legal interventions need to be made to protect a child. Children's Reporters offices can be found on the <u>Scottish Children's Reporter</u> <u>Administration website</u>.
- If a crime has been or may have been committed, consideration should be given to contacting the Police.

Multi Agency Working and Information Sharing

NAS children's services will always work in partnership with Local Statutory Safeguarding services and will externalise safeguarding concerns in accordance with locally published procedures and relevant national guidance.

Proportionality, Partnership, Consent and Sharing Information

Actions taken to safeguard children at risk must be the least intrusive responsive appropriate to the risk presented.

The Data Protection Act 2018 and GDPR places importance on the rights of data subjects to consent to sharing of their information, including children. Yet, sharing the right information, at the right time, with the right people, is fundamental to good practice in safeguarding.

'The Data Protection Act 2018 and General Data Protection Regulations (GDPR) **do not prevent the sharing of information for the purposes of keeping children safe**. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children' *Working Together to Safeguard Children,* 2018.

Staff members will seek to ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of children and young people. If staff members are in doubt about sharing information, they will seek advice





form the Safeguarding Team who can consult with the Data Protection Officer if necessary.

Child on Child Abuse

Children and young people will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Children will also be reassured that they will be taken seriously, be supported, and kept safe.

Where child-on-child abuse is identified all services will put in place:

- A risk assessment and management plan to minimise the risk of further child-onchild abuse;
- Record all allegations of peer on peer abuse and seek to ensure they are investigated and dealt with;
- Seek to ensure that victims, perpetrators and any other child affected by childon-child abuse will be supported and discussion will be recorded on the best way that this can occur

Sexual Violence and Harassment

All NAS Children's Services must:

- consider the makeup of the children attending the service, including the gender and age range of the children, and whether additional support for children with protected characteristics who are potentially at greater risk is appropriate
- consider what we can do to foster healthy and respectful relationships between different sexes and genders.
- Seek to ensure that their response to same sex sexual violence and sexual harassment is equally robust as it is for sexual violence and sexual harassment between children of the opposite sex

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of NAS services should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Any concerns about sexual abuse, sexual violence, or sexual harassment need to be discussed with the Safeguarding Team. The Safeguarding Team will be able to review the information available about the concern and identify necessary next steps, such as reporting to the Police.





When there has been a report of child on child sexual violence, the service's manager will make an immediate risk assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. Risk assessments should be recorded (written or electronic) and should be kept under review.

The risk assessments should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s) and if they can safely access the service in the future;
- all the other children (and, if appropriate, adults and staff) accessing the service, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
- consider intra familial harms and any possible necessary support for siblings following incidents,

Parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm. Children may express feelings of shame or that they do not want parents and carers to be told what has happened. Staff should not promise the child confidentiality but a child-centred approach to reporting this concern can be discussed with the Safeguarding Team. Ultimately, staff will have to balance the victim's wishes against their duty to protect the victim and other children.

Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. Whilst the age of criminal responsibility is 10 years old in England, Wales, and Northern Ireland and 12 in Scotland, if the alleged perpetrator is under this age, the starting principle of referring to the Police remains. The Police will take a welfare, rather than a criminal justice approach, in these cases.

Where there are images or videos of the abuse, **Staff are not to view or forward illegal images of a child.** It may be more appropriate to confiscate any devices to preserve any evidence and hand them to the Police for inspection.

Supporting Children and Families After Abuse

Children who have been abused can feel very confused and scared about what has happened. Child abuse sometimes causes physical injury and will leave emotional scars. People who have grown up being abused can feel worthless, unloved, betrayed, powerless, confused, frightened and mistrustful of others. They might feel, wrongly, that the abuse is their fault. Autistic children have additional difficulties in communicating their feelings. Known preferred communication methods such as symbols, pictures, photographs, gestures, signs, words will be used to assist children in expressing their feelings.





Children will be supported to cope with expressions of anger and strategies put in place to deal with these. Children will be supported to make them feel less lonely and isolated, feel better about themselves, and more confident.

Children who have been abused may experience any of the following:

- Triggers something someone says/does reminds them of abuse
- Intrusive memory a recollection of some aspect of the abuse unsolicited and difficult to ignore or remove
- Panic attacks feelings of absolute fear, anxiety that are overwhelming
- Inability to concentrate interrupted learning being so utterly consumed or overwhelmed by events that learning cannot take place
- Negative self-image consider themselves, stupid, a failure, bad, naughty etc.
- Resignation or retaliation withdrawal, retreat into self or attack and rejection of others, may pursue singular activities
- Self-harm deliberately inflicting pain or injury to self

Children who have experienced abuse or trauma may need access to specific support and/or staff approaches. This could include:

- Referral to local authority children's services for assessment or support for their long-term needs
- Access to appropriate therapeutic input
- Risk Assessment and Management Plan
- Child-centred care plans such as agreed information for staff on what they might talk about, what language they prefer to use about their experiences, and how to support them during periods of distress.

Parents or carers may disclose their child's historical abuse or trauma when accessing NAS services for support, such as their child's negative experiences in education or in the community. Disclosures from parents and carers will be followed up using the same procedure as any abuse. The Safeguarding Team can support in identifying appropriate support services and signposting for the family.

Allegations Against Staff (Including Trustees and Volunteers)

Any allegation that a member of NAS staff or a NAS volunteer has abused, harmed or neglected a child must be reported immediately to a senior manager within the organisation, the Safeguarding Team, the relevant statutory agencies and the relevant local authority.

Local authorities in the four nations deal with safeguarding allegations against staff in slightly different ways, but all can be reported through the local authority's child protection front door service. In England and Wales there is a specific officer called a Local Authority Designated Officer (LADO).

This report should be made within 24 hours of all allegations that come to an employer's attention or that are made directly to the Police if a member of staff or volunteer has or is alleged/ suspected to have:

• behaved in a way that has harmed a child, or may have harmed a child





- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child Staff are responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.
- Investigating and supporting the person subject to the allegation Staff should discuss with the local authority, the nature, content and context of the allegation, and agree a course of action.

The possible suspension of the staff member or volunteer, without prejudice, should be discussed with HR without delay if there are concerns that a staff member has harmed a child or is at risk of harming a child.

If the service ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children or young people, a settlement/compromise agreement **will not be used** and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS), Protecting Vulnerable Groups (PVG) or Access NI, as well as any professional body the staff member or volunteer may be a part of. This process will ordinarily be led by HR but it is the responsibility of the service manager to ensure this is done.

Low Level Concerns

A **low-level concern is** any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the service may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the local authority. (Examples of such behaviour could include, but is not limited to being over friendly with children; spending too much time with one child, having favourites)

Staff are not expected to determine for themselves whether a concern is low level or not. Any concern must be reported to the relevant manager who will make this assessment in collaboration with the Safeguarding Team, other internal and external professionals, and in full knowledge of any previous concerns.

Appendix 1 Youth Produced Sexual Imagery Procedure

When an incident involving youth produced sexual imagery comes to your attention:

- The incident should be referred to the Service Manager as soon as possible
- Consideration must be given to contacting the Police to discuss the potential for criminality





- The Service Manager should hold an initial review meeting with appropriate service staff
- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download this is illegal. If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the Service Manager and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery.
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the Service Manager.

Actions for the Service Manager:

The initial review should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the Police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown
- Whether immediate action should be taken to delete or remove images from devices or online services
- What education and support should be given to those involved
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another service, school, college, setting or individual
- Whether to contact parents or carers of the children involved in most cases parents should be involved

An immediate referral to Police and/or children's social care should be made if at this initial stage:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any young person in the imagery is under 13





• You have reason to believe a child or children are at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If a child was forced by another child into sending the image or video:

• Contact the local Police. Officers may be able to prevent the image from being circulated and take the appropriate action to safeguard the child

If a child shared the image or video willingly with another child:

- Talk to the child about the risks of sexting
- Think about contacting the other child or their parents to discuss the situation and make sure that the image is not circulated

If the image or video has been shared with an adult:

• Report it to <u>CEOP</u>, the Child Exploitation and Online Protection Centre. CEOP are the national Policing lead for online child sexual exploitation.

If the child believes the image or video has been circulated online (by a child or adult):

 The child can <u>contact ChildLine</u> who may be able to make a report (with their consent) to the Internet Watch Foundation to get the image removed from the internet

CEOP's <u>Thinkuknow</u> give advice for parents, as well as children and young people of different ages, on staying safe online. Thinkuknow have created <u>short videos</u> regrading why children 'sext', how to talk to them about it and what to do if their child is affected.

Appendix 2 Missing Child Procedure

Procedures for the event of a child going missing.

If a child goes missing on NAS premises

- The member of staff who has noticed the missing child will inform the Designated Safeguarding Lead or Registered Manager immediately.
- One member of staff should be allocated as a point of contact for receiving and disseminating information about the search for the missing child.
- Whilst a member of staff stays with the rest of the children, all other available members of staff will conduct a thorough search of the premises as directed by the DSL/Registered Manager. Staff will use mobile devices to communicate updates to the allocated point of contact.
- If the child has not been found after 10 minutes, then parents/carers should be notified.
- If the parents/carers have had no contact from the child, the Police will be contacted by dialling 999. Any medical, communication, learning needs or particular vulnerabilities must be disclosed to Police or other agencies.
- The incident should be relayed to other important agencies: If the child has an allocated Social Worker, then they should be informed of the disappearance.





If the child is a Looked After Child, then the Social Worker should be kept informed.

• The relevant Area Manager or equivalent and NAS Safeguarding Advisor for Children and Young People must be informed by the allocated point of contact as soon as possible after notifying Police and family.

The following areas within the premises will systematically be searched: [insert as appropriate to the service]

The search outside the premises should include: [insert as appropriate to the service]

If a child goes missing on a community outing

- The Trip leader must ensure the safety of the remaining children.
- The trip leader/organizer, in discussion with other staff will be responsible for making decisions relating to the trip.
- One or more adults should immediately start searching for the missing child.
- Regular head counting of children should take place, particularly before leaving a venue. It should be recorded what children are wearing that day.
- The Service Manager must be informed if a child is missing.
- Parents/carers should be notified.
- If the child has not been found within 10 minutes, the Police must be called by dialling 999 and then parents should be informed of this.
- Any medical or Special Educational Needs/ learning needs must be disclosed to Police or other agencies.
- The incident should be relayed to other important agencies: If the child has an allocated Social Worker, then they should be informed of the disappearance. If the child is a Looked After Child, then the Social Worker should be kept informed.

Actions After a Missing Incident

When the child is found, members of staff will care for and talk with the child, bearing in mind that they may be unaware of having done anything wrong or, alternatively, may also have been afraid and distressed and may now need comfort.

If hospitalisation is required TWO staff minimum must go in the ambulance.

After any incident of a missing child, a full incident report must be made on the service's recording system, giving full details of how and when the incident occurred.

Once the child has been safely located, the child's parents/carers, relevant professionals, and NAS management should be informed as promptly as possible.

After the incident, relevant senior management, such as Area Manager, will carry out a full investigation taking statements from all the staff present at the time.

The NAS Safeguarding Advisor for Children and Young People will offer a 'Post-Incident reflection' with involved staff. A conclusion is drawn as to how the incident happened and used to inform future Risk Assessments. A written report will be produced and policies and procedures will be reviewed.