



## Safeguarding Children Policy

**Last review: 12.6.26**

**Reviewed by: Amy Holgate, DSL**

**Approved by: Board Safeguarding Lead, Katherine Conlon**

**Next review: 12.6.27**

This policy sets out the steps all adults must follow to keep children safe in NeonDaisy sessions, activities and partner venues. NeonDaisy shares this policy with partner organisations where relevant to joint delivery.

This policy should be read alongside NeonDaisy's:

- Children's Safeguarding Procedure
- Digital Safeguarding Policy
- Adults' Safeguarding Policy and Procedure
- Practice Handbook: 'What's Under the Surface'
- Behaviour Code
- Data Protection, Privacy and Device Use Policies

### **Digital safeguarding concerns:**

Any safeguarding concern arising in a digital space (including in the parent/guardian Facebook group, email, social media or WhatsApp) is treated in the same way as an in-person concern: by following the Children's Safeguarding Procedure. The Digital Safeguarding Policy sets out platform-specific boundaries and expectations; the Children's Safeguarding Procedure sets out what adults must do next.

### **Children's Safeguarding Statement**

NeonDaisy is committed to creating safe, respectful, neuro-affirming environments for all children and young people. Everyone has the right to live free from abuse, neglect and exploitation. NeonDaisy has a duty of care to all children who interact with our organisation, and all staff share this duty of care.

We work primarily with neurodivergent girls and gender non-conforming young people aged 8-18. Our safeguarding approach reflects their lived experiences, sensory needs, communication styles and the structural biases they face.

All adults share responsibility for safeguarding and must follow this procedure to recognise concerns, respond proportionately, record accurately and report promptly.

Safeguarding applies in all contexts, including sessions, partner venues, online spaces, editorial processes and in the community.

## **1. Purpose and scope**

This policy sets out how NeonDaisy safeguards children and young people in all our work. It applies to:

- Directors
- Employees
- Freelancers
- Volunteers
- Sessional workers
- Facilitators from partner organisations co-delivering with NeonDaisy
- External practitioners
- Any other adults present in a NeonDaisy youth group session

It covers:

- One-off workshops, including those run with partner organisations
- Longer groups programmes
- Young people submitting contributions to publications
- Mixed DBS environments
- Contextual safeguarding
- Specific needs of neurodivergent girls and gender non-conforming young people, including those from the Global Majority

Young people who turn 18 during a programme move under the Adult Safeguarding Policy. We complete a short handover with the young person, their family (where appropriate) and staff to ensure continuity, clarity and safe boundaries.

This policy is approved by the Board Safeguarding Lead on behalf of the Board of Directors, who hold overall accountability for safeguarding within NeonDaisy.

## **2. Our safeguarding principles**

NeonDaisy is committed to:

- Child-centred practice: The welfare of the child is paramount

- Neuro-affirming practice: Behaviour is communication; sensory, communication and regulation needs are understood and supported
- Trauma-informed practice: Safety, predictability, co-regulation and consent
- Contextual safeguarding: Recognising risks in community spaces and peer groups, as well as online, eg coercion and child-on-child harm
- Anti-adultification: Especially for Global Majority young people whose distress or dysregulation is often misread as 'attitude' or 'defiance'
- Safer culture: Open communication, psychological safety, reflective practice and proportionate information-sharing
- Cultural safety: Cultural or religious beliefs must never be used to justify behaviour that causes harm or places a child or adult at risk
- Proportionate, achievable systems: Safeguarding that is effective, sustainable and appropriate to the scale of our organisation.
- Child voice: Young people are supported to express concerns about their safety, including concerns about adults. Information is shared in clear ways so young people understand who they can talk to and what will happen next.

### **3. Legal and guidance framework**

This policy is informed by:

- Working Together to Safeguard Children (2026)
- Children Act 1989 & 2004
- SEND Code of Practice (2015)
- Equality Act 2010 (reasonable adjustments)
- Safeguarding Vulnerable Groups Act 2006
- Online Safety Act 2023
- Domestic Abuse Act 2021
- Local Safeguarding Partnerships (Bristol, South Glos, North Somerset)

We also draw on:

- NSPCC Learning
- National Autistic Society
- Anna Freud Centre
- Contextual Safeguarding Network

### **4. Definitions**

#### **Child**

Anyone under 18.

#### **Abuse categories**

Statutory categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

### **Specific harms:**

Forms of harm recognised in Working Together to Safeguard Children (2026) and related statutory guidance:

- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Harmful sexual behaviour
- Domestic abuse
- Female genital mutilation (FGM)
- Trafficking
- Forced marriage
- Honour-based abuse
- Serious youth violence
- County lines
- Radicalisation
- Fabricated or induced illness
- Modern slavery
- Bullying/cyberbullying
- Sextortion (coercion to obtain sexual images or money)
- Online abuse
- Harmful content via online algorithms

### **Child-on-child abuse**

Harm caused by one child to another, including physical, emotional, sexual or online harm. This includes bullying, coercive control, harmful sexual behaviour and child-on-child abuse.

### **Prevent and radicalisation**

NeonDaisy is not a Prevent specified authority. We remain alert to signs that a young person may be at risk of radicalisation or extremist influence. Concerns are managed in line with local safeguarding arrangements and the Prevent duty guidance.

### **Regulated activity**

Work that meets the legal threshold for an enhanced DBS with barred list check. At NeonDaisy, this includes facilitators, freelancers and volunteers who lead or support sessions with young people.

## **Low-level concerns**

A low-level concern is any behaviour or situation involving an adult that feels 'off', causes unease, is inconsistent with the behaviour code, or could indicate a lapse in professional judgement or an emerging pattern of risk - even if it does not meet the threshold for an allegation.

## **5. Specific vulnerabilities**

Neurodivergent girls and gender non-conforming young people experience particular vulnerabilities because of social norms and the ways girls are often socialised to be compliant, polite and accommodating. This can increase the risk of harm or may make it harder for adults to recognise when they are unsafe. Grooming, coercion and child-on-child harm in particular can be harder to identify.

Specific vulnerabilities include:

- Sensory overwhelm: Distress or dysregulation triggered by sensory input
- Shutdowns or meltdowns, which may mask underlying harm or distress
- Masking or fawning - hiding distress or complying to avoid conflict
- Communication differences, making it harder to report concerns or describe experiences
- Difficulty identifying physical needs, including pain, hunger or discomfort
- Emotionally based school avoidance which may be misunderstood as defiance
- Misinterpretation of behaviour - where distress is seen as rudeness or 'attitude'
- Higher vulnerability to peer pressure, including coercion within friendships
- Difficulty recognising unsafe adults, especially when adults appear friendly or supportive
- Social difficulties and literal interpretation
- Strong desire to fit in

NeonDaisy takes these vulnerabilities seriously and responds in ways that are proportionate, affirming and aligned with communication and sensory needs.

## **Girls and gender non-conforming young people from the Global Majority**

These young people may experience adultification bias, where they are perceived as older, more responsible or less vulnerable than they are. This can lead to:

- Minimising their distress
- Misinterpreting dysregulation as 'attitude'
- Overlooking safeguarding concerns
- Failing to recognise exploitation or coercion

NeonDaisy actively counters adultification and ensures concerns are assessed fairly and without bias.

### **Intersectional vulnerabilities**

Some young people experience overlapping risks due to a combination of:

- Neurodivergence
- Gender identity
- Being from the Global Majority
- Disability
- LGBTQ+
- Socio-economic disadvantage

We recognise that these factors can compound vulnerability and shape how harm is experienced, disclosed or recognised.

## **6. Roles and responsibilities**

### **Board Safeguarding Lead**

Provides oversight, receives annual safeguarding reports and ensures accountability. All Directors receive safeguarding induction and training proportionate to their role. Directors with safeguarding responsibilities hold an enhanced DBS.

### **Designated Safeguarding Lead (DSL)**

- Leads safeguarding across NeonDaisy
- Makes decisions about referrals
- Liaises with the local authority
- Oversees training and record-keeping
- Supports staff wellbeing
- Ensures neurodivergent-specific and contextual risks are understood

### **Deputy DSL**

Acts when the DSL is unavailable.

### **Session Safeguarding Officer**

The session lead for each in-person group and the first point of contact for concerns.

### **Employed staff, freelancers, volunteers, directors:**

- Follow this policy
- Report concerns immediately
- Maintain safe boundaries

- Do not work alone with a child

### **Co-delivery partner facilitators**

- Receive a short, practical safeguarding briefing before joining a session
- Provide appropriate DBS evidence where their role involves direct work with children

### **Other adults**

- Adults accompanying a child (parents, carers, support workers, interpreters) must follow NeonDaisy's safeguarding expectations and are never left alone with other children.
- Some external practitioners (e.g., publication designers supporting creative content sessions) may not require a DBS because their presence in the group is one-off. These adults are always supervised, never have unsupervised access to children, and do not undertake any safeguarding decision-making.
- Volunteer moderators in digital spaces are not safeguarding decision-makers and escalate all concerns, however small, to the DSL.

### **DBS oversight**

The DSL oversees DBS checks for staff, freelancers, volunteers and co-delivery partners. The Board Safeguarding Lead oversees the DSL's DBS.

## **7. Safeguarding young people in leadership roles**

### **Young Peer Mentors and Youth Design Team members**

NeonDaisy supports young people to take part in leadership, co-design and creative roles through the Young Peer Mentor pathway and the Youth Design Team. These young people are children and young people, not staff, and are therefore safeguarded under this Childrens Safeguarding Policy.

NeonDaisy ensures that young leaders:

- Are never responsible for the safety, supervision or behaviour of other children
- Do not provide 1:1 support, manage conflict or make safeguarding decisions
- Participate on a voluntary and flexible basis
- Have support to prioritise their own sensory, communication and wellbeing needs
- Are always supervised by two DBS-checked adults in all in-person and online spaces
- Are protected from adultification, over-responsibility and blurred boundaries
- Adults remain responsible for all safeguarding decisions and supervision

### **Young leaders turning 18**

Young Peer Mentors or Youth Design Team members who turn 18 move under the Adult Safeguarding Policy from their 18th birthday. They do not become staff or volunteers and are not placed in positions of authority over children. A short handover is completed with the young person to ensure clarity of boundaries, expectations and support.

## 8. Safer culture

NeonDaisy builds a safer culture through predictable routines, clear communication and neuro-affirming practice. Our aim is to create environments where young people feel understood and adults feel confident to act when something is not right.

We create environments where:

- Communication is clear, concrete and inclusive
- Expectations are predictable and transitions are explained
- Sensory needs are understood and supported
- Adults model calm, respectful behaviour
- Young people can express needs without fear
- Staff can raise concerns without judgement
- Reflective practice is normal and used to improve safety
- Masking and fawning are recognised as safety strategies rather than misinterpreted as “coping”
- Wellbeing check-ins are routine for both young people and adults

**Practice guidance:** NeonDaisy uses our developing practice handbook, ‘What’s Under the Surface’ as the foundation for our bespoke facilitator training and induction. The handbook supports adults to understand the internal processes, sensory factors and contextual pressures that may influence how a young person presents, and offers examples of indicators of distress, dysregulation and sensory discomfort, and proportionate responses. It is used alongside this policy and does not replace professional judgement or statutory safeguarding requirements.

**Facilitator wellbeing:** NeonDaisy supports facilitator wellbeing and ensures adults can access guidance or support where needed, particularly during or after safeguarding incidents, so that practice remains safe and consistent.

**Self-harm and suicidal thoughts:** These are treated as safeguarding concerns. Adults respond calmly and report immediately to the DSL, who follows local authority guidance.

**Digital:** Digital safeguarding, photography, filming and media use follow the Digital Safeguarding Policy and the 'Creative contributions' section of the Children's Safeguarding Procedure.

**Positive risk-taking:** NeonDaisy supports young people to build autonomy and confidence through planned, proportionate positive risk-taking, grounded in safety, clear boundaries and an understanding of each young person's communication and sensory needs.

**Supporting dysregulation and preventing escalation:** NeonDaisy recognises that dysregulation, overwhelm, shutdowns, meltdowns and sudden changes in behaviour are a form of communication.

Adults respond early, reduce sensory load, use clear and concrete communication and offer calm co-regulation to prevent escalation. Because we gather clear information about each young person's communication needs, sensory profile and regulation strategies, adults can use approaches that are more likely to help that individual feel safe.

Where behaviour becomes unsafe, adults act proportionately to keep everyone safe, using the minimum physical contact necessary only in emergencies and in line with NeonDaisy's meltdown support guidance and training. Behaviour is never managed through punitive responses.

## 9. Safer recruitment

NeonDaisy follows safer recruitment practices proportionate to a small CIC and aligned with statutory guidance. We retain recruitment records, references and DBS evidence in line with UK GDPR and statutory guidance.

### DBS checks

- Enhanced DBS with barred list check for regulated activity
- Enhanced DBS for supervised contact
- No one without a DBS is ever alone with a child
- The Board Safeguarding Lead oversees the DSL's DBS

Co-delivery partners and external practitioners must meet NeonDaisy's safeguarding expectations. Where their role involves direct work with children, they must provide appropriate DBS evidence.

Visiting professionals who support creative or technical aspects of group workshops (eg a graphic designer visiting a workshop to gather art contributions for our magazine) do not require DBS checks when their contact with young people is incidental and time-limited. They are never left alone with children, and are supervised at all times by NeonDaisy's DBS-checked staff. They receive a safeguarding briefing and understand how to escalate any concerns rather than attempting to manage themselves.

### **References**

Two references are required for all staff and freelancers.

### **Induction**

Induction covers safeguarding, behaviour code, accommodations and needs, contextual risks and reporting routes. Co-hosting partner facilitators receive a practical briefing before joining a session.

### **Workforce suitability and boundaries**

Workforce checks ensure facilitators can maintain professional boundaries, model safe relational practice and work in ways that support children's wellbeing.

Facilitators receive support to maintain appropriate professional distance and reflective practice. Self-disclosure is used thoughtfully and only when it supports safe, bounded practice.

## **10. Training and competency**

NeonDaisy ensures that everyone working with children receives safeguarding training appropriate to their role, proportionate to their level of contact with young people and aligned with statutory guidance.

### **Baseline training**

- Core safeguarding training (delivered by an external, accredited provider)
- Refresher training every two years
- Induction briefing on NeonDaisy's safeguarding policy, procedures, behaviour code and reporting routes

### **Enhanced training**

Enhanced training is provided for the DSL and Deputy DSL.

### **Project-specific training**

Project-specific training led, informed by our practice handbook and run by NeonDaisy's Session Safeguarding Lead/s, prepares facilitators for:

- Specific vulnerabilities and needs
- Group-specific scenarios
- Low-level concern scenarios
- Co-regulation
- Crisis and meltdown support
- Sensory and communication needs
- Contextual risks
- Boundaries and expectations
- Conflict protocols
- Safe relational practice

Training is delivered by an adult with lived experience in neuro-affirming, accessible formats using visual tools, concrete examples and co-created flowcharts to support decision-making. Regular check-ins help identify assumptions, misunderstandings or areas needing clarification.

### **Partner venues**

When delivering with partners, NeonDaisy ensures alignment on safeguarding expectations and reporting processes so that all adults understand their responsibilities.

## **11. Safer working practice**

Pre-session information gathering ensures adults understand communication needs, sensory profiles, triggers and regulation strategies. Risk assessments are completed for venues, activities and cohorts.

### **Supervision and contact rules**

These rules apply in all NeonDaisy spaces with children and young people:

- Staffing levels are planned to ensure safe supervision and to meet the needs of the group, taking account of the profiles and needs of young people and contextual risks.
- Sessions take place in open, observable environments
- Line-of-sight supervision is maintained
- Doors remain open unless there is a clear safeguarding reason to close them
- Visitors and external practitioners whose roles do not require a DBS are supervised at all times and are never left alone with a child

**One to one contact:** NeonDaisy avoids one-to-one situations between staff and young people, ie any situation where a staff member is the only responsible adult present with a young person and the interaction is not supervised or visible to others. In the rare event of an emergency where brief one-to-one contact is unavoidable, the staff member involved must hold an enhanced DBS check. The incident is recorded and reported to the DSL.

### **Creative contributions submitted by young people**

NeonDaisy welcomes creative and editorial contributions from young people for our print magazine and digital platforms. All submissions are handled in line with our Children's Safeguarding Procedure. Staff receiving contributions remain alert to any content that may indicate a safeguarding concern, including disclosures, distress or identity-based harm. Any concerns are immediately escalated to the DSL or Deputy DSL. Young people do not submit content directly to individual staff members' personal accounts or devices.

### **Digital and communication boundaries**

Digital boundaries, platform rules and digital-specific risks are set out in the Digital Safeguarding Policy. A summary of key boundaries is listed here:

- Adults do not use personal devices for photos or filming - only NeonDaisy devices to be used and consent approved by parents/guardians and young people in advance.
- Storage of images / film in accordance with NeonDaisy's UK GDPR and Data Protection policies
- Adults will not take the numbers of or private message young people under any circumstances.
- Contact from young people or adults-at-risk via digital channels is handled in line with the Digital Safeguarding Policy.
- Any safeguarding concern arising in a digital space follows the Children's Safeguarding Procedure.

### **Adults who pose a risk**

Where NeonDaisy becomes aware of a known offender or person who may pose a risk, a proportionate risk assessment is completed, in consultation with the local authority where appropriate, and safety measures are put in place.

### **Transporting young people**

NeonDaisy staff and volunteers do not transport children except in exceptional circumstances with DSL approval, parental consent and a risk assessment.

## **Residential**

NeonDaisy does not run residential; if this changes, a separate protocol will be created.

## **12. Information sharing and confidentiality**

NeonDaisy shares information in ways that protect children and respect privacy. We share information:

- Proportionately
- On a need-to-know basis
- In line with UK GDPR
- Using clear, concrete language

We follow the principle that safeguarding overrides confidentiality. Adults do not promise confidentiality and explain clearly when information must be shared.

### **When we share information**

Information is shared when:

- A child is at risk of harm
- A pattern of low-level concerns emerges
- A partner organisation needs information to keep a child safe
- The DSL judges that sharing is necessary

Parents are informed unless doing so increases risk. Young people are supported to understand what will be shared and why.

### **Co-delivering with partner organisations**

When delivering with partner organisations, NeonDaisy keeps its own safeguarding record. The Session Safeguarding Officer and DSL ensure concerns are shared with the partner organisation's DSL only where relevant, so that both systems remain aligned.

Differences in recording processes must never delay reporting a concern.

## **13. Record keeping**

We use a safeguarding log to ensure concerns are recorded consistently and reviewed effectively. Logs are:

- Factual
- Timely
- Securely stored
- Reviewed by the DSL

- Used to inform decisions and identify patterns

Low-level concerns are logged and monitored. When working with partners or in their spaces, we follow their recording expectations in addition to our own to ensure information is not lost between systems.

All records include date, time, context, who was present, and the exact words used where relevant. Records are stored securely in line with NeonDaisy's Data Protection procedures.

Digital evidence handling follows the Digital Safeguarding Policy, including not screenshotting or deleting content unless directed by the DSL.

Data breaches are reported immediately to the DSL and the Managing Director, who follow NeonDaisy's Data Protection procedures.

#### **14. Whistleblowing and escalation**

NeonDaisy maintains a culture where concerns about safeguarding practice can be raised without fear. Adults can raise concerns with:

- The DSL
- The Deputy DSL
- Board Safeguarding Lead
- The Local Authority Designated Officer (LADO)
- The NSPCC Whistleblowing Helpline

Concerns may relate to:

- Unsafe practice
- Breaches of the behaviour code
- Repeated low-level concerns
- Unsafe adult dynamics
- Failures to follow safeguarding procedures
- Concerns about the DSL or organisational leadership

If adults disagree about whether a concern should be escalated, they may raise it directly with the DSL, Deputy DSL or Board Safeguarding Lead, and if still concerned, escalate to the LADO.

Adults may escalate outside the organisation at any point if:

- They believe a child is at risk of harm
- There is a conflict of interest

- The concern involves the DSL or leadership
- Internal responses are inadequate or delayed

No one will be penalised for raising a concern in good faith.

## **15. Managing allegations**

An allegation is any concern that a staff member, volunteer, freelancer or partner facilitator has:

- Harmed a child
- May pose a risk of harm to children
- Behaved in a way that indicates they may be unsuitable to work with children
- Behaved in a way that could bring the organisation into disrepute

All allegations are reported immediately to the DSL. If the allegation concerns the DSL, it is reported to the Deputy DSL or Board Safeguarding Lead.

The DSL or Board Safeguarding Lead will:

- Make no internal investigation
- Contact the Local Authority Designated Officer (LADO) for advice
- Follow LADO and police guidance
- Ensure the adult is informed of the process
- Ensure children are protected during the process

NeonDaisy cooperates fully with statutory agencies. Records are kept securely and separately from general HR files.

## **16. Low-level concerns**

A low-level concern is any behaviour by an adult connected to NeonDaisy that does not meet the threshold for an allegation but may cause unease, indicate a lapse in professional judgement, or suggest a pattern of emerging risk. Low-level concerns help identify issues early and prevent escalation.

Low-level concerns may relate to:

- Adults facilitating groups
- Parents or guardians in NeonDaisy spaces
- Moderators or members of the online community
- Freelancers, partners or external practitioners
- Adults representing NeonDaisy in person or online

- Family members of adults connected to NeonDaisy where behaviour may indicate risk

Examples include:

- Boundary-blurring
- Over-familiarity or inconsistent behaviour
- Poor professional judgement
- Repeated minor breaches of the behaviour code
- Interactions that feel uncomfortable, confusing or out of character
- Patterns of behaviour that may indicate increased risk

Low-level concerns are reported to the DSL. They are recorded in the safeguarding log and reviewed regularly to identify patterns or changes in behaviour. Patterns of low-level concerns may be escalated if they indicate increased risk or meet the threshold for an allegation.

Digital low-level concerns are outlined in more detail in the Digital Safeguarding Policy. They are treated in the same way and are recorded and reviewed by the DSL.

Adults will not be penalised for raising low-level concerns in good faith.

## **17. Early indicators of risk**

NeonDaisy recognises that safeguarding includes noticing early indicators of risk in a child's presentation, home context, peer relationships or interactions with adults. These indicators may be subtle and may not meet a statutory threshold, but they help identify emerging patterns of concern.

Early indicators may include:

- Changes in behaviour, mood or engagement
- Signs of distress, fear, withdrawal or overwhelm
- Peer dynamics that cause discomfort or exclusion
- References to unsafe adults, secrecy or coercion
- Indicators of unmet needs, instability or contextual risk

Adults record observable behaviour only and report early indicators to the DSL so patterns can be identified and responded to proportionately.

## **18. Responding to disclosures**

Adults respond to disclosures in line with the Children's Safeguarding Procedure. They listen without interruption, avoid leading questions, reassure the child, and record and report promptly.

## **19. Immediate danger and emergencies**

If a child is in immediate danger, adults take action to keep them safe and contact emergency services. Immediate danger includes situations where:

- A child is at risk of serious harm
- A child discloses current or imminent danger
- An adult poses an immediate threat
- A medical emergency occurs
- A child goes missing or cannot be accounted for

Adults must:

- Prioritise the child's safety
- Contact 999 if urgent help is needed
- Alert the DSL as soon as possible
- Follow instructions from emergency services
- Ensure other children are supervised and safe

A factual record is made after the incident and passed to the DSL. The DSL will follow NeonDaisy's safeguarding and critical incident procedures, including notifying statutory agencies where required.

## **20. Governance and oversight**

NeonDaisy maintains proportionate but robust safeguarding governance. Oversight focuses on learning, accountability and alignment with statutory guidance.

Governance includes:

- Annual safeguarding report to the Board
- Policy reviewed annually
- Learning from incidents shared proportionately
- DSL oversight of training, logs and reflective practice
- Serious incidents notified to statutory agencies
- Reflective practice for facilitators
- Partner alignment on safeguarding expectations

Where a safeguarding concern involves a senior leader, the matter is escalated directly to the Board Safeguarding Lead.

The DSL leads the annual review of this policy, with oversight and approval from the Board Safeguarding Lead, and the policy is updated sooner if legislation, guidance or organisational practice changes.