



Safeguarding Children Procedure

Last review: 12.6.26

Reviewed by: Amy Holgate, DSL

Approved by: Board Safeguarding Lead, Katherine Conlon

Next review: 12.6.27

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

This procedure should be read alongside NeonDaisy's:

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

1. Purpose and scope

The Children's Safeguarding Procedure sets out the practical steps all adults must follow to recognise concerns, respond safely, record accurately and report promptly. It translates the Safeguarding Children Policy into clear, operational actions for use in all NeonDaisy contexts.

This procedure applies to:

- In-person groups in community venues
- One-off workshops and longer programmes
- Online spaces used by NeonDaisy, including moderated communities
- Editorial and creative contribution processes
- Sessions co-delivered with partners
- Public and semi-public spaces where NeonDaisy activities take place

It applies to all adults connected to NeonDaisy, including:

- Directors, employees, freelancers and volunteers
- Sessional workers
- Co-delivery partners
- External practitioners
- Adults accompanying a child (parents, carers, support workers, interpreters)

This procedure must be followed whenever a concern arises about:

- A child's safety or wellbeing
- An adult's behaviour, including low-level concerns
- Early indicators
- Contextual risks in community or co-delivery partner environments
- Online or digital interactions, alongside the Digital Safeguarding Policy

It ensures safeguarding practice is consistent, proportionate, neuro-affirming and aligned with the sensory and communication needs and intersectional risks of neurodivergent girls and gender non-conforming young people, including those from the Global Majority.

2. Key contacts

Designated Safeguarding Lead (DSL)

Amy Holgate - Managing Director
amy@neondaisy.org.uk / 07842 737933

Deputy Safeguarding Lead (DDSL)

Ellayah Woodward-Lindsay, Non-Executive Director
hello@ellayahmay.com / 07934 924571

Board Safeguarding Lead

Katherine Conlon, Non-Executive Director and Chair
katherineneondaisy@gmail.com

Local authority children's safeguarding contacts

- Bristol First Response: 0117 903 6444
- South Glos ART: 01454 866000
- North Somerset SCP: 01275 888808
- Emergency Duty Team (all areas): 01454 615165
- NSPCC Helpline: 0808 800 5000

Emergency response - Police: 999

3. Definitions (summary)

- **Child:** Anyone under 18.
- **Abuse:** Physical, emotional, sexual, neglect, exploitation, domestic abuse, online harm, harmful sexual behaviour, trafficking, FGM.
- **Prevent:** Concerns about extremist influence, coercive control, ideology or radicalisation. NeonDaisy is not a Prevent-specified authority, but adults remain alert to signs of extremist influence or radicalisation.
- **Vulnerabilities:** Sensory overwhelm, shutdowns, meltdowns, masking, fawning, communication differences, difficulty identifying unsafe adults, misinterpretation of distress.
- **Low-level concern:** 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.
- **Disclosure:** When a child communicates - directly or indirectly, in person or online - that they are unsafe.

See Children's Safeguarding Policy for full definitions.

4. Roles and responsibilities

Designated Safeguarding Lead (DSL)

- Leads safeguarding across NeonDaisy.
- Makes decisions about referrals.
- Liaises with local authority and Prevent teams.
- Oversees training, staff DBS checks, record-keeping and reflective practice.
- Ensures specific vulnerabilities and contextual risks are understood.

Deputy DSL

- Acts when the DSL is unavailable.
- Supports day-to-day safeguarding practice.
- Contributes to decision-making, record-keeping and liaison with external agencies as directed by the DSL.

Board Safeguarding Lead

- Provides governance oversight of safeguarding across NeonDaisy.
- Reviews safeguarding reports and ensures accountability at Board level.
- Oversees the DSL's DBS check.
- Ensures policies and procedures are reviewed and approved annually.

Session Safeguarding Officer

- First point of contact in the room for concerns during a session
- Supports delivery team to complete safeguarding log
- Ensures coordination with co-delivery partners and follows their processes and logs when required.

Employed staff, freelancers, volunteers, directors

- Follow this procedure.
- Report concerns immediately.
- Maintain safe boundaries.
- Never work alone with a child unless part of a planned, risk-assessed activity approved by the DSL.

Co-delivery partner facilitators

- Receive a safeguarding briefing before joining a session.
- Must follow supervision and reporting expectations.

Other adults

Visiting professionals who support creative or technical aspects of group workshops on a one-off basis (eg a graphic designer visiting a workshop to gather art contributions for our magazine) 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.

Adults accompanying a child (parents, carers, support workers, interpreters) must follow NeonDaisy's safeguarding expectations and are never left alone with other children.

Young Peer Mentors and Youth Design Team members

Young Peer Mentors and Youth Design Team members contribute to co-design, creativity and group culture, but they are children and young people, not staff. They are not responsible for supervision, behaviour management, conflict resolution or safeguarding decisions. They are supported and supervised as participants at all times, with their sensory, communication and wellbeing needs prioritised. Adults ensure they understand that their involvement is voluntary.

5. Safer working practice – preparation for in-person sessions

5.1 Information gathering

Before a young person attends a group session, adults gather essential information from parents/carers and young people (where appropriate), including communication needs, sensory profile, known triggers, regulation strategies and patterns of shutdown, masking or fawning. Information is collected in clear, flexible and accessible ways.

Where NeonDaisy becomes aware of a known offender or person who may pose a risk, the DSL completes a proportionate risk assessment and puts safety measures in place.

Young leaders turning 18: If a Young Peer Mentor or Youth Design Team member turns 18 during a programme, the Adult Safeguarding Procedure applies from that date. A short handover is completed with the young person and staff to clarify boundaries, expectations and support. They do not become staff or volunteers and are not placed in positions of responsibility for children or left alone with them unsupervised.

5.2 Risk assessments

NeonDaisy completes venue-specific, activity-specific and cohort-specific risk assessments. These are reviewed before each project, updated when new information emerges and shared with facilitators in accessible formats.

- Adults continually assess risk during sessions, including sensory triggers, peer dynamics, environmental changes and contextual factors.
- Any new risks identified during a session are recorded and shared with the DSL so risk assessments can be updated.
- Where sessions involve creative/editorial processes, digital and contextual risks are included in the risk assessment.

5.3 Alignment with co-delivery partners

Before delivery, NeonDaisy and partner staff hold a practical safeguarding discussion to agree individual needs, communication requirements and risks for the group; clarify reporting routes and processes; confirm supervision arrangements; and ensure shared understanding of thresholds and escalation routes.

5.4 Preparing external practitioners

External practitioners visiting groups on a one-off basis receive a safeguarding briefing, understand supervision arrangements, and understand how to escalate any concerns rather than attempting to manage themselves.

5.5 Preparing young Peer Mentors

Before each programme or session, Young Peer Mentors receive training and support tailored to their needs, along with an appropriate NeonDaisy safeguarding briefing covering boundaries and expectations.

6. Safer working practice – during in-person sessions

6.1 Supervision rules

- Sessions take place in open, observable environments.
- A minimum of two adults are present at all times. Staffing ratios increase where group needs require it.
- Line-of-sight supervision is maintained throughout.
- Doors remain open unless there is a safeguarding reason to close them.
- Young Peer Mentors and Youth Design Team members are supervised in the same way as all children.
- Co-delivery partners must follow pre-agreed supervision and reporting expectations.
- External professionals visiting the group on a one-off basis are never left alone with children, and are supervised at all times by NeonDaisy's DBS-checked staff. They receive a safeguarding briefing before a session and understand how to escalate any concerns rather than attempting to manage themselves.
- Any other adults accompanying a child (parents, carers, support workers, interpreters) are never left alone with other children and supervised at all times by NeonDaisy's DBS-checked staff.

6.2 One-to-one contact

Adults do not work one-to-one with a child in any space, ie any situation where the staff member is the only responsible adult present and the interaction is not visible or supervised by others.

If privacy is needed, adults move to a space in sight but out of earshot.

If an emergency makes brief one-to-one contact unavoidable, only an enhanced-DBS staff member responds. Staff ensure the situation is visible or time-limited, prioritise the young person's immediate safety, and notify the DSL as soon as possible. The incident is recorded as per the steps in **Section 9**, including the reason and duration.

No digital one-to-one contact is permitted, including messaging, private chat, WhatsApp. This includes Young Peer Mentors – all contact is through parents/carers or in person as per supervision rules.

6.3 Unexpected children

If an unregistered child enters the space, they come under this procedure immediately. Two adults maintain line-of-sight. Staff establish identity, ensure safety, contact parents if known and inform the DSL.

6.4 Young leaders in sessions

Young Peer Mentors and Youth Design Team members do not lead activities independently, supervise peers, provide 1:1 support or manage behaviour. Adults monitor their wellbeing and offer regular breaks and check-ins. Adults ensure they are never left alone with other children and never placed in a position where they could be perceived as responsible for another child's safety. Their participation is always supported by two DBS-checked adults.

6.5 Movement around venues

Children move in supervised groups. No child moves alone through public or semi-public areas. Toilets are checked before sessions and adults wait outside.

Adults also consider contextual risks in:

- Corridors, stairwells and shared spaces
- Open public spaces
- Mixed-age environments
- Journeys to and from sessions
- Online spillover affecting in-person safety
- Adults adapt supervision in real time if environmental risks change (e.g., increased footfall, unexpected adults in shared spaces, noise spikes or layout changes).

If a child goes missing during a session:

- Enhanced DBS adult to take the lead
- Alert the Session Safeguarding Officer immediately.
- Ensure the rest of the group remains supervised by two adults.
- Search the immediate area, including toilets, corridors and exits.
- Consider whether the child may be hiding due to sensory overwhelm or distress
- If the child is not found within minutes, contact parents/carers.
- If there is any concern for safety, call 999.
- Inform the DSL as soon as possible.
- Record the incident as per steps in **Section 9**

6.6 Arrival and dismissal

Children are signed in and out by a parent/carer or agreed adult. Unexpected arrivals are managed safely. Late collections require two-adult supervision. No child leaves without an agreed adult unless written consent is in place.

6.7 Transporting young people

NeonDaisy staff and volunteers do not transport children. Any exceptional circumstance requires DSL approval, parental consent and a recorded risk assessment.

6.8 Residentials

NeonDaisy does not run residentials or overnight stays. If this changes, a separate safeguarding protocol will be created.

6.9 Safe touch

Touch must be necessary, consent-based, brief and visible to another adult.

Principles

- Only when needed for safety, regulation or first aid.
- Obtain consent first and explain purpose of the touch
- Keep it minimal and brief.
- Adults should never ask for touch for their own comfort.
- Always visible to another adult.
- Never between waist and mid-thigh or near the chest (except first aid).
- Adults remain aware that some neurodivergent young people may experience touch as painful, overwhelming or confusing, even when consent is given.

Examples of appropriate touch

- Offering a hand to help someone stand.
- A brief side-hug only if initiated by the child.
- Guiding a child away from danger.
- First aid.

Examples of unsafe touch

- Any touch that could be misinterpreted as intimate.
- Touch used to control behaviour.
- Touch without consent (except emergencies).
- Prolonged touch.

Appropriate and unsafe touch to be discussed in NeonDaisy project-specific training for longer programmes to ensure all facilitators have a chance to check their understanding and assumptions about touch through concrete examples rather than abstract terms.

Adults follow the same boundaries with each other.

Emergency touch

In situations where a child is at immediate risk of harm and consent cannot be obtained, adults may use the minimum physical contact necessary to keep the child safe. Emergency touch must be:

- Proportionate: Only what is needed to prevent harm
- Brief: Released as soon as the danger has passed
- Non-restrictive where possible: Guiding rather than holding
- Visible: Another adult present wherever possible
- Explained: Clear, concrete language
- Recorded: Logged afterwards and passed to the DSL

Where emergency touch is required during meltdowns, shutdowns or aggressive behaviour, adults act in line with NeonDaisy's practice handbook and project-specific training. Physical contact is always the minimum necessary for safety, used only to prevent harm, and followed by calm regulation support once the child is safe.

Intimate care

NeonDaisy does not provide routine intimate care and does not recruit young people to groups where intimate care needs are anticipated. If an emergency arises, intimate care is provided only to keep a child safe, with two adults present, doors open where possible, and with dignity, clear communication and minimal exposure. The incident is recorded and shared with the DSL.

6.10 Regulation strategies to de-escalate

Adults recognise early signs of dysregulation and provide early, calm support to prevent escalation. Because NeonDaisy gathers clear information about each young person's communication needs, sensory profile and the most effective regulation strategies for them, adults can use approaches that are more likely to help that individual feel safe and regain control.

Support includes reducing sensory load, offering clear and concrete communication, moving with the young person to a safe space, allowing recovery time and informing parents/carers as needed. Adults understand that distress may present as shutdown, overwhelm, masking, fawning or sudden changes in behaviour.

Where physical safety is at risk, adults act in line with NeonDaisy's practice handbook and training on supporting dysregulation and crisis behaviour, using only the minimum

contact necessary to keep young people safe and communicating with parents/carers and recording the incident afterwards.

6.11 Supporting adults during sessions

NeonDaisy's neurodivergent facilitator team may occasionally experience overwhelm or difficulty regulating in busy or unpredictable environments, despite proactive supports and accommodations in place. NeonDaisy puts mitigations in place to support adults to maintain safe, consistent practice at all times while modelling self-regulation and self-care.

To maintain safe sessions:

- Facilitators complete an access rider before sessions, so the team understands each others sensory and communication needs, and what helps each adult maintain safe, regulated practice over time.
- Adults remain aware of their own regulation and use established team support to stay calm, consistent and boundaried, communicating needs clearly as required.
- Adults work collaboratively and proactively, so that children always receive calm, regulated and predictable support.
- Adults use self-disclosure thoughtfully and only when it supports safe, professional practice.
- Adults seek guidance from the Session Safeguarding Officer or DSL if they need additional support or adjustments.
- In longer programmes, the team lead checks in with each member on the day of each session via WhatsApp, and using concrete tools like decision-making flowcharts to support them to check their own capacity; and arranges the facilitation team structure accordingly.

6.12 Positive risk-taking

In sessions facilitators support autonomy and confidence of young people through planned, proportionate positive risk-taking, using approaches that reflect each young person's communication and sensory needs. This includes:

- Trying new activities
- Navigating social situations
- Making choices
- Developing independence

Positive risk-taking is always grounded in safety, clear boundaries and an understanding of what helps each young person feel secure.

6.13 Digital boundaries

Filming/photos: Adults do not use their personal devices for photos, filming or communication with young people in any NeonDaisy space (in person or online). Photos and film are taken only on NeonDaisy devices as pre-arranged, with advance consent from both parents/carers and young people. We avoid asking for consent in the moment, as young people may feel pressured to agree on the spot.

The comfort and safety of young people always take priority over promotion or content creation. Images are stored securely on NeonDaisy server and deleted from devices in line with NeonDaisy's Data Protection policy.

Young people's devices: For one-off events, we share expectations with young people for phone use safety, including sensory needs, mixed-age considerations, self-care and respectful boundaries. A simple flowchart helps young people to decide when and how to use their phones safely and appropriately in a concrete way. For longer term programmes, young people and facilitators will work together to define this shared agreement for device use throughout the programme.

Digital communication: NeonDaisy does not use digital platforms to communicate directly with young people. All communication with young people occurs in person as per supervision arrangements or via their parent or carer. This includes Young Peer Mentors and Youth Design Team members.

- Refer to the Digital Safeguarding Policy for more information.
- Any digital concern is recorded and reported as per the steps in **Section 9** in the same way as in-person concerns.

7. Identifying concerns

Adults share concerns immediately, however small. This includes, but is not limited to:

- Changes in behaviour
- Signs of distress or dysregulation
- Sensory discomfort
- Unsafe adult behaviour
- Disclosures
- Child-on-child harm
- Concerns about extremist influence or radicalisation
- Bullying, exclusion or repeated unkind behaviour
- Concerns about sexual or criminal exploitation

Adults use their knowledge of each young person's communication and sensory profile to recognise when something feels 'off', even if the signs are subtle or masked. Our practice handbook provides additional examples of indicators and safe, proportionate

responses, and is used in training and induction to support facilitator judgement. It does not replace this procedure or statutory safeguarding requirements.

Specific vulnerabilities:

Adults remain alert to the ways neurodivergent girls may be more vulnerable to exploitation, including masking or fawning that hides distress, difficulty recognising unsafe adults, literal communication, compliance, social naivety, sensory overwhelm, or adultification of young people from the Global Majority.

Cultural or religious practices are respected, but they cannot be used to explain or excuse behaviour that places a child at risk of harm.

Digital safeguarding concerns:

Digital safeguarding concerns (including concerning messages, posts, emails, direct messages, unsafe content, or contact from young people or adults-at-risk) are recognised in the same way as in-person concerns. Adults remain alert to online coercion, sextortion, grooming indicators, child-on-child harm and contextual risks arising in digital spaces.

Partner organisations:

When delivering with partner organisations, adults follow NeonDaisy's expectations for identifying concerns.

Exploitation:

Signs may include grooming, coercion, unexplained absences, sudden changes in behaviour, fear of certain peers or adults or involvement in risky groups.

Concerns about young leaders:

Any safeguarding concern involving a Young Peer Mentor or Youth Design Team member is recorded and reported in the same way as for any child. Adults avoid assumptions about maturity or capability and record factual observations only.

8. How to handle a disclosure from a child or young person

When a child discloses information that indicates they may be unsafe, adults respond calmly, clearly and without judgement.

Adults may refer to the practice handbook for examples of how disclosures may appear indirectly or through behaviour, writing or creative work, though this document does not replace this Procedure.

Immediate response

- Move to a space in sight but out of earshot.
- If not DBS-checked, ask a trained adult with appropriate DBS to join and take the lead.
- Listen without interruption or judgement.
- Reassure the child they have done the right thing and that it is not their fault.
- Use clear, concrete language.
- Do not ask leading questions
- Do not question the alleged abuser.
- Explain sensitively that you might need to share the information proportionately to help keep them safe.
- Explain what will happen next in simple steps.
- Record and report to the DSL as soon as possible.
- If there is immediate danger, call 999.

Self-harm or suicidal thoughts:

- Treat as a safeguarding concern.
- Listen without judgement.
- Reduce sensory load if the child is distressed.
- Explain sensitively that you might need to share the information proportionately to help keep them safe.
- Record and report to the DSL immediately.
- If there is immediate danger, call 999.

Online harm:

If a disclosure relates to online harm, refer to the Digital Safeguarding Policy and follow the same steps in this Procedure as for in-person disclosures.

If a child withdraws, minimises or changes their disclosure

- Adults do not pressure the child to continue.
- Adults reassure the child they are believed.
- Explain sensitively that you might need to share the information proportionately to help keep them safe.

If the adult responding to the disclosure becomes overwhelmed: If the adult becomes overwhelmed or needs support, they should ask another trained adult to join to ensure the child receives calm, regulated support.

9. Responding to other concerns

Adults respond to other concerns by:

- Recording observable behaviour only, using clear, factual language – they do not investigate concerns themselves.
- Avoiding interpretation or assumptions about what the behaviour means.
- Reporting the concern to the DSL as soon as possible.
- Following the DSL's direction on next steps.
- Challenging unsafe practice by colleagues where safe to do so and reporting it to the DSL.
- Using our practice handbook to support understanding of subtle indicators or patterns. The handbook guides practice but does not replace this procedure.

9.1 Responding if a child is not in immediate danger

- **Record the concern immediately** using the safeguarding log
- **Notify the DSL within 24 hours** (email plus same-day phone call).
- **Provide clear, factual information** without interpretation.
- **Follow the DSL's direction** on next steps.
- **Ensure the rationale for decisions is recorded** by the DSL.

Recording digital concerns

If the concern arises online, digital concerns are reported to the DSL via the safeguarding log in the same way as in-person concerns. Adults record on the safeguarding log:

- Platform
- Date and time
- Username (if known)
- A factual description of what was seen or disclosed
- Immediate actions taken

Digital evidence handling follows the Digital Safeguarding Policy. Adults do not screenshot or delete digital content unless directed by the DSL.

Recording concerns when co-delivering with partners

Adults report concerns immediately to the Session Safeguarding Officer, who ensures the concern is logged in NeonDaisy's safeguarding log and DSL as per our procedure.

Where the concern relates to a child attending through a partner organisation, a partner facilitator, or a partner venue, the Session Safeguarding Officer also shares the concern with the partner organisation's DSL so both systems remain aligned. Differences in process must never delay reporting a concern

9.2 If a child is at immediate risk

- Call 999.
- Inform the DSL as soon as possible.
- Ensure two-adult supervision until emergency services arrive.
- Record the incident as soon as it is safe to do so.
- Parents or carers are informed **only when this does not increase risk** and after advice from emergency services or the DSL.

9.3 If the DSL and Deputy DSL are unreachable

- Contact the local authority First Response team or the police.
- Inform the DSL as soon as possible afterwards.
- Record the incident as soon as it is safe to do so.
- Parents or carers are informed **only when this does not increase risk** and after advice from First Response or police.

10. Low-level concerns & early indicators of risk

Low-level concerns relate to adult behaviour that feels ‘off’, causes unease or is inconsistent with expected boundaries, even if it does not meet the threshold for an allegation. This includes the behaviour of staff, freelancers, volunteers, co-delivery partners, visitors and parents/carers present in the space. These concerns help identify early signs of poor judgement, blurred boundaries or emerging risk.

Alongside low-level concerns about adults, NeonDaisy also recognises early indicators of risk relating to a child’s life outside the group and to peer relationships.

All NeonDaisy staff receive project-specific training to support clear identification of subtle or emerging concerns. They do not need to decide whether the behaviour is harmful or evaluate level of risk, just report it.

Digital low-level concerns are recorded and reviewed in the same way as in-person concerns.

Record observable behaviour only and log as per the steps in Section 9.

10.1 Adult behaviour in the space - low-level concerns

Professionals, eg:

- Repeatedly seeking time alone with a child
- Using personal disclosures that feel too intimate or emotionally charged
- Ignoring or overriding a child’s sensory or communication needs
- Showing irritation, frustration or emotional volatility
- Touching a child in ways that are not necessary, brief or consent-based

- Crossing boundaries with other adults in the space

Parents/guardians/carers, eg:

- Speaking harshly, shaming or belittling their child
- Attempting to engage other children in private conversation or physical contact
- Overriding a child's sensory or communication needs in ways that cause visible distress
- Displaying emotional volatility, unpredictability or hostility in front of children

10.2 A child's life outside the group – early indicators of risk

Examples include:

- Being left alone for long periods
- Adults shouting, arguing or being unpredictable at home
- Physical discipline or fear of someone at home
- Hunger, exhaustion or unmet physical needs
- Unsafe adults online or in the community
- Pressure to keep secrets
- Self-harm, suicidal thoughts or extreme distress
- Unexplained marks, bruises or injuries, or sudden sensitivity to touch

These may be early indicators of neglect, emotional or physical harm or contextual risk.

10.3 Peer relationships – early indicators of risk

Peer dynamics can be complex, especially for neurodivergent young people who may mask distress, miss social subtext or feel overwhelmed by group interactions. Adults consider each child's sensory, communication and processing needs when observing peer interactions, as these can affect how distress, imbalance or discomfort is expressed or recognised.

Examples include:

- Consistent exclusion or isolation of another child
- Fear, anxiety or withdrawal around a particular peer
- Pressure to share personal information
- Teasing about sensory needs, communication differences or identity
- Following, touching or crowding that causes distress
- Online spillover affecting safety in the session
- Sudden avoidance of a peer after physical contact, or unexplained minor injuries linked to peer interactions

These may indicate emerging bullying, coercion, harmful dynamics or early signs of physical harm.

11. Child-on-child harm

Child-on-child harm sits above low-level concerns and peer-relationship concerns. It refers to actual incidents of harm that require immediate intervention. Child-on-child harm includes physical, emotional, sexual or online harm caused by one child to another. It may be a single incident or a pattern of behaviour.

Adults present in the session who are responsible for children must follow protocol as per training, safeguarding procedures and practice handbook and:

- Intervene immediately to ensure safety
- Separate children calmly and without blame
- Reduce sensory load where needed
- Avoid asking leading questions or investigating
- **Record observable behaviour only and log as per the steps in Section 9**

The DSL assesses whether the behaviour is:

- Conflict
- Bullying
- Relational harm
- Contextual risk
- Harmful sexual behaviour
- Child-on-child abuse

They will decide next steps, including whether to inform parents or the local authority.

12. Unsafe parent or carer collection

If a parent or carer arrives in a state that may place the child at risk, the child remains on site under two-adult supervision. Adults:

- Inform the DSL immediately
- Keep the child in a calm, safe space
- Reduce sensory load if the child is distressed
- Avoid confrontation with the parent/carer
- Follow local authority advice

The child is not released until the DSL confirms it is safe to do so. If immediate risk is present, adults call 999.

Record observable behaviour only and log as per the steps in Section 9.

13. Creative contributions

When young people contribute artwork, writing, interviews or lived-experience content, adults ensure the process is safe, adults:

- Only liaise with parents/carers to coordinate contributions, not young people directly.
- Ensure young person knows participation is voluntary and can be withdrawn at any time
- Offer choice on the format for interviews (email, voice note or in person)
- Use clear, non-therapeutic questions
- Check emotional readiness with parents/carers
- Offer breaks and sensory adjustments
- Agree boundaries in advance
- Use plain-language consent forms
- Anonymise contributions unless explicit consent is given
- Avoid identifiable or risky content
- Avoid re-traumatisation by not revisiting unwanted experiences
- Remain alert to masking or fawning that may hide distress or pressure to please

In person interviews or artwork creation sessions are run with the same supervision and DBS rules as group sessions in this procedures.

Creative contributions are stored securely and deleted if consent is withdrawn, unless anonymised and no longer identifiable.

Digital submissions follow the Digital Safeguarding Policy and this Procedure.

Safeguarding indicators in creative production

Adults remain alert to safeguarding concerns that may arise through the content or the process of creating. Observable indicators may include:

- Drawings or writing showing violence, fear or distress
- References to unsafe adults, secrecy, threats or coercion
- Sexualised content that is not age-appropriate
- Depictions of self-harm or suicidal themes
- Repeated themes of isolation, hopelessness or danger
- Content showing bullying, peer pressure or harmful dynamics
- Visible distress, shutdown, overwhelm or panic during the process
- Masking, fawning or people-pleasing that hides discomfort
- Pressure from peers or adults to share personal content
- Withdrawal of consent accompanied by fear or anxiety

Any safeguarding concern arising from the content or the process is **recorded and reported as per Section 9**, using observable information only.

14. Concerns about adults

Concerns about adults include any behaviour that may pose a risk to children, breach boundaries, or indicate that an adult is struggling to maintain safe practice. Concerns may relate to NeonDaisy facilitators, co-delivery partners, visiting professionals or volunteers.

Concerns about adults may include:

- Harm to a child or behaviour that may be harmful
- Possible criminal offences
- Breaches of the behaviour code
- Repeated low-level concerning behaviour
- Distress, dysregulation or emotional volatility that affects safe practice
- Over-identification with a child or blurred boundaries
- Ignoring or overriding a child's sensory or communication needs
- Seeking time alone with a child
- Inappropriate personal disclosures

These behaviours may indicate poor judgement, boundary issues or early signs of risk.

14.1 Reporting concerns about adults

- Report to the DSL immediately.
- If the concern is about the DSL, report to the Deputy DSL.
- Concerns about co-delivery staff are reported to the DSL, who informs the venue's safeguarding lead and the local authority as required.
- Do not question the adult or child involved.
- **Record the concern as per the steps in Section 9.**

14.2 LADO involvement

The DSL or Deputy DSL contacts the Local Authority Designated Officer (LADO) when:

- An adult has harmed a child
- An adult may have committed a criminal offence
- An adult's behaviour indicates they may pose a risk to children
- There are repeated low-level concerns that, taken together, raise the threshold for LADO involvement

The DSL/Deputy DSL records the rationale for contacting (or not contacting) the LADO on the Safeguarding log, **as per Section 9**.

14.3 Serious incidents

A serious incident may require reporting to external bodies such as:

- Local authority children's services
- The police
- Companies House for CIC governance issues
- Funders or commissioners

The DSL or Managing Director holds responsibility for external reporting.

The rationale for any external report is recorded on the Safeguarding log, **as per Section 9.**

15. Whistleblowing and concerns about safeguarding practice

Whistleblowing allows adults to raise concerns about safeguarding practice within NeonDaisy, especially when they feel unable to use normal reporting routes or believe those routes have not kept children safe.

Concerns may relate to:

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

Adults can raise concerns with:

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

Adults are encouraged to raise concerns early, including when masking, fawning or uncertainty makes it difficult to speak up in the moment. No one will be penalised for raising a concern in good faith.

Whistleblowing concerns are recorded by the DSL or Board Safeguarding Lead on the safeguarding log, **as per Section 9.**

16. Information sharing

Information is shared:

- Proportionately
- On a need-to-know basis
- Using secure channels
- In line with UK GDPR

Parents/carers are informed unless doing so increases risk. If information cannot be shared, the DSL records the rationale on the safeguarding log, **as per Section 9**.

Information shared with external agencies follows the same principles and is limited to what is necessary to protect the child.

Co-delivery partners/host

NeonDaisy keeps its own safeguarding record even if the co-delivery partner or host organisation also logs the concern. The Session Safeguarding Officer ensures the concern is recorded in NeonDaisy's safeguarding log and, where relevant, shared with the partner organisation's DSL so their system is updated where required. This prevents information being lost between systems. Any information shared with partner venues is proportionate, on a need-to-know basis, and recorded on the safeguarding log as **per Section 9**.

17. Recording and UK GDPR

All concerns must be recorded using the safeguarding log. Records must be:

- Factual
- Timely
- Securely stored
- Free from interpretation or assumption
- Written using the child's exact words where possible

Safeguarding records are stored in the secure, restricted-access safeguarding folder on the NeonDaisy server.

Retention

Safeguarding records are kept in line with statutory guidance (usually until the child is 25) unless legal advice indicates otherwise. The DSL reviews retention schedules annually.

Data breaches

A data breach includes information that is:

- Lost

- Sent to the wrong person
- Accessed without authorisation
- Insecurely stored

Adults inform the DSL immediately. The DSL:

- Records the breach on the safeguarding log
- Takes remedial action
- Escalates to the ICO if required

18. Monitoring, implementation and review

NeonDaisy maintains proportionate but robust oversight of safeguarding practice. This procedure is:

- Reviewed annually or sooner if guidance changes or new risks emerge
- Led by the DSL, with oversight and approval from the Board Safeguarding Lead
- Informed by feedback from staff, volunteers and young people

Safeguarding is implemented through:

- Training
- Supervision and reflective practice
- Safer recruitment
- Proportionate risk assessment
- Clear reporting routes

The DSL ensures that learning from incidents, near misses and low-level concerns is incorporated into updates of this procedure and into staff training and practice development. Monitoring includes regular review of safeguarding logs to identify patterns, themes or emerging risks.

Safeguarding log

Safeguarding concerns are recorded using the Children's Safeguarding Log, held as a separate document and reviewed annually.