



Safeguarding Adults 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 adults 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:

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

Safeguarding statement

NeonDaisy is committed to safeguarding adults at risk and creating safe, respectful neuro-affirming environments. Many adults who interact with NeonDaisy are neurodivergent - including our facilitators, contributors and parents/carers - and may have diverse sensory, communication or processing needs. Our approach supports autonomy, clarity and dignity. We recognise that many adults may experience racialised or gendered misinterpretation or minimisation of distress, and safeguarding responses take these structural factors into account.

NeonDaisy does not run adult groups or adult-facing programmes, nor are we a crisis service. Adults in immediate crisis are signposted to emergency services or specialist helplines; staff do not provide therapeutic or crisis interventions.

Safeguarding applies in all contexts where adults interact with NeonDaisy, including children's sessions, online spaces, partner venues, the community and at home (via our publications).

All adults representing NeonDaisy share responsibility for safeguarding and must follow this policy and the Adults' Safeguarding Procedure to recognise concerns, respond proportionately, record accurately and report promptly.

1. Purpose and scope

This policy sets out NeonDaisy's commitment to safeguarding adults at risk and maintaining safe, respectful, neuro-affirming environments.

Who this policy applies to

These are the adult roles that come into contact with NeonDaisy and are therefore covered by this policy:

- Directors and employees
- Freelancers and sessional workers
- Parents/carers present in or near children's in-person sessions
- Parents/carers in our private Facebook community
- Volunteer moderators of our private Facebook community
- Adults contributing lived-experience content (digital or print), consultancy or co-design
- Co-delivery partners running events
- Any other adults present in a NeonDaisy children's session or online space

What safeguarding adults covers

These are the types of safeguarding situations this policy addresses:

- Adults who may be at risk in their own lives
- Adults whose behaviour may affect the safety of children's groups
- Adults who interact with NeonDaisy online
- Adults who contribute lived experience
- Adults in our workforce who may need safeguarding support

NeonDaisy does not run adult groups or adult programmes.

When a young person turns 18 during a programme, NeonDaisy completes a short handover with the young person and staff to ensure continuity, clarity and safe boundaries. From that point, the Adults' Safeguarding Procedure applies.

Operational steps, including how to recognise, respond, record and report concerns, are set out in the Adults' Safeguarding Procedure. Digital safeguarding concerns arising in email, social media, WhatsApp or the parent Facebook group are treated in the same way as in-person concerns, via the Safeguarding Adults Procedure.

2. Safeguarding principles

NeonDaisy is committed to:

- Person-centred practice
- Neuro-affirming practice
- Trauma-informed practice
- Proportionate, achievable systems
- Cultural safety
- Safer culture
- Anti-adultification
- Safe online practice
- Partnership working
- Equality, dignity and non-discrimination

Making Safeguarding Personal (MSP)

Safeguarding responses are aligned with MSP. Adults are supported to express their wishes, views and desired outcomes. These are recorded and revisited unless there is overriding risk to the adult or others.

3. Legal and guidance framework

This policy is informed by:

- Care Act 2014
- Mental Capacity Act 2005
- Working Together 2026 (for transitions at 18)
- Human Rights Act 1998
- Data Protection Act 2018
- Domestic Abuse Act 2021
- Modern Slavery Act 2015

NeonDaisy follows the safeguarding adults procedures of the local Safeguarding Adults Boards (Bristol, South Gloucestershire and North Somerset). Where a concern meets the threshold for a safeguarding enquiry under Section 42 of the Care Act 2014, the DSL cooperates fully with Adult Social Care, the police and other agencies.

We also draw on NSPCC Learning, the National Autistic Society, the Anna Freud Centre and the Contextual Safeguarding Network.

4. Definitions

Adult: Anyone aged 18 or over.

Adult at risk:

An adult at risk is a person over the age of 18 years and is:

- having needs for care and support, and
- experiencing, or is at risk of, abuse and neglect and
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Safeguarding

Protecting a person's health, wellbeing and human rights so they can live free from abuse, harm and neglect.

Abuse categories (Care Act 2014)

Physical, emotional, sexual, financial, neglect, domestic abuse, discriminatory abuse, organisational abuse, self-neglect, exploitation, coercion, modern slavery and trafficking.

Financial abuse may include:

Pressure to hand over money, misuse of benefits, coercion to pay for services, online scams, exploitation through 'support' arrangements or unauthorised use of bank accounts or digital wallets.

Prevent / radicalisation

Concerns are escalated to the DSL, who may seek advice from local Prevent teams and record the rationale for decisions.

Specific vulnerabilities

Neurodivergent adults may experience sensory differences, masking or fawning, communication differences, difficulty identifying unsafe adults, increased vulnerability in unfamiliar environments, racialised or gendered misinterpretation, normalising unsafe behaviour due to past trauma, socialised compliance and delayed help-seeking.

Carer-related risk

Some adults may be at risk from partners, family members or carers. Carer stress, coercion, controlling behaviour, financial abuse or neglect may increase vulnerability.

Domestic abuse and coercive control

Many adult safeguarding concerns relate to domestic abuse or coercive control, including post-separation abuse.

Mental capacity

NeonDaisy follows Mental Capacity Act principles: assume capacity unless proven otherwise; support decision-making; respect unwise decisions; act in best interests where capacity is lacking; choose the least restrictive option.

Adults choosing risk

Adults may make choices that involve risk. NeonDaisy supports adults to make informed decisions unless there is overriding risk.

Advocacy

Adults may be supported by an advocate, family member or friend when making safeguarding decisions.

5. Roles and responsibilities

Board Safeguarding Lead

Provides oversight, receives annual safeguarding reports, oversees the DSL's DBS and acts when the DSL is unavailable.

Designated Safeguarding Lead (DSL)

Leads adult safeguarding, makes safeguarding decisions, oversees online safeguarding, liaises with adult safeguarding teams, oversees training and record-keeping and supports facilitator wellbeing.

Deputy DSL / Board Safeguarding Lead

Acts when the DSL is unavailable.

Session Safeguarding Officer

Acts as first point of contact in children's sessions, monitors adult-child dynamics, supports adults to maintain safe practice and escalates concerns.

Facilitators and volunteers

Follow policy and procedure, maintain boundaries, model safe relational practice, communicate support needs and escalate concerns.

Team Leads

Provide supervision and reflective check-ins and support facilitators to work safely and sustainably.

Moderators

Follow digital safeguarding policy, apply group rules, escalate concerns immediately, do not provide advice or crisis support and operate under daily DSL oversight.

Co-delivery partners' safeguarding leads

Receive concerns about their staff, liaise with the DSL, follow their own safeguarding procedure and agree escalation routes before work begins.

Co-delivery partner practitioners

Receive a safeguarding briefing before joining a children's session and follow NeonDaisy's safer working practice.

Visitors/other adults

Are supervised and do not have unsupervised access to children or adults at risk.

6. Safer culture

NeonDaisy builds a safer culture through predictable routines, clear communication and neuro-affirming practice. We create environments where:

- Communication is clear, concrete and inclusive
- Expectations are predictable and transitions are explained
- Sensory needs are understood and supported
- Adults can express needs without fear
- Staff can raise concerns without judgement
- Reflective practice is routine
- Masking and fawning are recognised as safety strategies
- Wellbeing check-ins are routine

Self-harm and suicidal thoughts are treated as safeguarding concerns. Adults respond calmly and report immediately to the DSL.

Digital safeguarding, photography, filming and media use follow the Digital Safeguarding Policy.

Concerns that NeonDaisy's systems, routines or culture may be causing harm or restricting rights are treated as potential organisational abuse and escalated to the DSL and Board Safeguarding Lead.

7. Safer recruitment

NeonDaisy follows safer recruitment practices proportionate to a small CIC and aligned with statutory guidance.

- Enhanced DBS with barred list check for regulated activity
- Enhanced DBS for supervised contact
- Basic DBS or no DBS for roles with no direct contact, based on risk assessment
- No one without a DBS is ever alone with an adult at risk

- The Board Safeguarding Lead oversees the DSL's DBS

Facebook community moderators are not vetted because they do not work with children or adults at risk and operate under daily DSL oversight.

Two references are required for all staff and freelancers.

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

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

8. Training and competency

NeonDaisy ensures that adults involved in delivery receive safeguarding preparation that is proportionate to their role, aligned with statutory guidance and grounded in neuro-affirming practice.

All adults working with NeonDaisy complete adults' safeguarding training so they understand how to recognise and escalate concerns about adults-at-risk, contextual risks in partner or community spaces, online communities, and any adult behaviour that may impact children's safety.

For longer projects or roles with additional responsibilities, project-specific preparation includes adult safeguarding considerations, digital safety expectations and contextual risks relevant to the work, led by our neurodivergent team leaders.

The DSL and Deputy DSL receive enhanced adults safeguarding training appropriate to their responsibilities.

Neurodivergent facilitators are supported through reflective practice, supervision and appropriate accommodations. Support may include communication, sensory or processing adjustments, regular wellbeing check-ins and a flexible approach to team structure that takes account of fluctuating capacity while maintaining safe boundaries and decision-making.

9. Safer working practice with adults

Adults working with NeonDaisy must:

- Maintain clear, respectful and professional boundaries
- Use concrete, accessible communication
- Avoid over-identification or blurred roles
- Avoid inappropriate self-disclosure
- Avoid dual relationships
- Avoid offering therapeutic advice or crisis support

- Communicate their own support needs when relevant to safe practice
- Seek guidance from the DSL or team lead if additional support or adjustments are needed
- Escalate concerns about adults-at-risk or unsafe adult behaviour promptly

Adults working with NeonDaisy are never responsible for children's supervision unless this forms part of a planned, risk-assessed activity under the Children's Safeguarding Procedure.

Communication with parents/carers

Adults may communicate with parents/carers by email where this is part of agreed programme delivery, using organisational accounts only. No communication takes place via social media messaging or personal accounts. All communication maintains professional boundaries, protects personal data, and follows NeonDaisy's expectations for safe, respectful and secure communication.

Adults present in or near children's sessions

These expectations relate to adult safeguarding duties when adults are present in or near children's spaces. They ensure adults are protected, supported and boundaried, and prevent adult behaviour from creating risk for children.

NeonDaisy commits to:

- Maintaining safe adult-child boundaries
- Supporting adults to communicate sensory or regulation needs
- Ensuring adults do not discipline other people's children
- Ensuring adults do not join private conversations with young people
- Ensuring adults do not take photos or videos
- Providing calm, safe spaces for adults who become distressed
- Informing the DSL when adult distress affects safety or supervision

These expectations protect adults from blurred roles or unsafe situations and ensure predictable, safe environments for everyone.

Adults who pose a risk

Where NeonDaisy becomes aware of a known offender, an adult-at-risk, or any adult whose behaviour or presence may create risk, the DSL completes a proportionate risk assessment and puts safety measures in place. Safety measures may include supervision arrangements, boundaries, restricted access or liaison with partner organisations or statutory agencies.

Decisions are made on a need-to-know basis and recorded in line with NeonDaisy's safeguarding and data protection procedures.

10. Adults in online spaces

Online adults safeguarding is governed by this policy and the Digital Safeguarding Policy.

Public-facing channels are not used for crisis support or safeguarding reporting. Adults receive clear signposting for alternative and urgent support services when they contact us online.

Online concerns, including coercion, harassment, unsafe contact, extremist content or digital exploitation, are treated in the same way as in-person concerns and follow the Adults' Safeguarding Procedure.

Adults who pose a risk online (eg harassment, extremist content and coercive behaviour) are managed in line with the Adults' Safeguarding Procedure and may require removal or reporting.

10.1 Private parent/guardian Facebook community

Some parent/guardians in the online community may themselves be adults at risk. Safeguarding applies equally to adults who engage only online and have no in-person contact with NeonDaisy.

Volunteer / freelance / employed moderators receive a short, role-specific induction covering digital safeguarding, recognising concerns, escalation routes and boundaries. Moderators follow a weekly rota and use a shared communication channel, which includes the DSL, to raise posts of concern, request cover and ensure proportionate oversight. The DSL provides regular guidance and reviews emerging themes.

Moderators of NeonDaisy's private Facebook group for parents/guardians do not provide advice, crisis support or private communication. They escalate concerns immediately, do not investigate and operate under daily DSL oversight.

Parents posting about distress

If a parent posts about significant distress, crisis or concerns about their wellbeing, moderators escalate immediately to the DSL. Moderators do not provide emotional support, reassurance or crisis intervention. Parents are signposted to appropriate services. The DSL decides whether the post meets the threshold for an adult safeguarding concern and records the rationale.

Signposting and crisis information

NeonDaisy maintains a mental-health signposting page on our website, reviewed at least quarterly to ensure accuracy. This page is used when adults share distress, crisis or wellbeing concerns online. Adults receive signposting only; moderators and staff do not provide emotional support, reassurance or crisis intervention.

High-risk online concerns involving adults or children

Moderators may see posts indicating significant risk to an adult or child. These include suicidal feelings because of worry about their young person's wellbeing and lack of support, own unmet neurodivergent needs, chronic illness, carer stress, being a lone parent without support, domestic abuse, coercive control, or a child's behaviour creating danger for the adult. These concerns are escalated immediately to the DSL. Moderators do not provide emotional support, reassurance or crisis intervention. The DSL determines whether the concern meets adult safeguarding thresholds, child safeguarding thresholds, or both.

Use of information from the parent Facebook community

Volunteer, freelancers or employed moderators may see personal information, contextual family details or the identity behind anonymous posts.

This information is not used in children's sessions, programme delivery or relational practice unless it indicates a safeguarding concern. Moderators do not refer to, act on or disclose information gained through moderation unless there is risk of harm. Anonymous posts are not de-anonymised unless required for safeguarding.

11. Low-level concerns

A low-level concern is any behaviour by an adult - in any NeonDaisy context - that:

- May indicate a pattern
- May affect relational safety
- May affect boundaries
- May undermine safe culture
- Is not a safeguarding allegation
- Does not meet the threshold for referral

Examples include:

- Inconsistent boundaries
- Inappropriate tone or communication
- Repeated difficulty maintaining boundaries
- Blurred professional or relational boundaries
- Disrespectful or dismissive communication
- Minor breaches of safer working practice
- A moderator applying rules inconsistently
- A parent/carer behaving in a way that causes discomfort or undermines safety

Low-level concerns are recorded factually, noting observable behaviour only, and reviewed by the DSL. Patterns are monitored and addressed proportionately. Low-level concerns may relate to adults who may be at risk or adults who may pose a risk.

Historic or non-recent abuse is taken seriously, and adults are supported to report concerns regardless of when they occurred.

12. Concerns about adults working for NeonDaisy

Concerns about the behaviour, conduct or suitability of NeonDaisy staff, freelancers, volunteers or partner facilitators are treated as safeguarding concerns. This includes concerns that an adult may be at risk or may pose a risk in their own life.

All concerns are reported immediately to the DSL. The DSL may remove individuals from duties while enquiries take place to maintain a safe environment. Concerns are recorded factually and proportionately. Where a concern indicates abuse, neglect, exploitation or criminal behaviour, the DSL contacts Adult Social Care or the police. Concerns about the DSL are escalated to the Board Safeguarding Lead.

NeonDaisy cooperates fully with statutory agencies and keeps records securely and separately from general HR files.

13. Safeguarding in lived-experience work

NeonDaisy works with adults who contribute lived experience, through facilitation of groups, creative work, consultancy or co-development of services.

Participation is by informed agreement. Consent processes are neurodivergent-friendly, using clear, concrete language and predictable steps. Adults are supported to assess their emotional readiness before sharing lived experience or sensitive material.

NeonDaisy does not provide therapeutic support; adults are signposted to appropriate services if needed.

The DSL reviews any content or contribution that may involve risk, including domestic abuse, immigration issues or disclosures relating to children. The DSL ensures no adult is placed at risk through participation, publication or public attribution.

Material is anonymised by default unless explicit, informed consent is given for attribution.

14. Responding to disclosures

Adults respond to disclosures in line with the Adults' Safeguarding Procedure. They listen without interruption, avoid leading questions, reassure the adult and record and report promptly. They do not investigate, interpret or offer therapeutic advice.

15. Immediate danger and emergencies

If an adult is in immediate danger, adults take action to keep them safe and contact emergency services.

Adults must:

- Prioritise the adult's safety
- Contact 999 if urgent help is needed
- Alert the DSL as soon as possible
- Follow instructions from emergency services
- Ensure other adults and children are supervised and safe
- Avoid offering crisis counselling or therapeutic support

A factual record is made after the incident and passed to the DSL.

16. Information sharing

We commit to:

- Sharing information proportionately
- Using clear, concrete language
- Using neuro-affirming communication
- Sharing on a need-to-know basis
- Using secure systems
- Complying with UK GDPR
- Prioritising safeguarding over confidentiality

Consent is not required to share information where a crime may have been committed, where there is risk of serious harm, where others may be at risk or where an adult lacks capacity.

Adults are informed when information must be shared unless doing so would increase risk.

17. Record keeping

We commit to:

- Maintaining accurate, factual safeguarding records
- Recording observable behaviours
- Storing records securely
- Monitoring patterns of concern
- Ensuring the DSL reviews records regularly
- Retaining safeguarding records in line with statutory retention periods
- Keeping safeguarding records separate from general HR or operational files

Operational steps and templates are set out in the Adults' Safeguarding Procedure.

18. Governance and oversight

NeonDaisy maintains proportionate but robust safeguarding governance.

We commit to:

- Annual safeguarding reporting to the Board
- Annual review of this policy and the Adults' Safeguarding Procedure
- Reflective practice for neurodivergent staff
- Alignment with partner organisations
- DSL oversight of lived-experience contributions
- Escalation to the Board Safeguarding Lead where needed
- Monitoring patterns of adult-related safeguarding concerns

NeonDaisy cooperates with Safeguarding Adults Reviews and implements learning from SARs, local learning reviews and multi-agency audits.

Concerns about service quality or dissatisfaction with provision are managed through NeonDaisy's complaints process. Concerns that indicate abuse, neglect, exploitation or significant risk are treated as safeguarding concerns.

19. Thresholds for referral

The DSL decides when concerns meet the threshold for referral to Adult Social Care or the police. Threshold decisions are recorded with a clear rationale. Adults reporting concerns or disclosures do not make threshold decisions or conduct enquiries themselves.

20. Implementation

NeonDaisy implements this policy through:

- Training
- Supervision
- Safer recruitment
- Proportionate risk assessment
- Clear reporting routes
- Daily oversight of online spaces
- Partnership alignment
- Maintaining clear adult safeguarding boundaries
- Neuro-affirming communication and predictable processes that support adults to engage safely

Where adults have substantial difficulty engaging in safeguarding processes, the DSL encourages access to independent advocacy and provides clear, concrete communication to support understanding and decision-making.

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