UMAY PREVENTION CIC

Safeguarding Children, Young People and Adults Policy

(Combined Policy for Children, Young People & Adults at Risk)

Policy Version	1.1
Date of Implementation	15.10.2026
Approved By	Sinem Aksay, Pınar Cangir Ustun, Yunus Emre Berk
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1 · Purpose and commitment

- Umay Prevention CIC (UMAY) works to create safer conditions for migrant women, children and young people and to strengthen organisations to prevent harm, respond with care and build inclusive communities. Our work is preventative, trauma-informed, culturally responsive, linguistically accessible, safeguarding-led and partnership-based.
- UMAY is committed to protecting children, young people and adults at risk from abuse, neglect, exploitation and avoidable harm. Safeguarding is everyone's responsibility. This policy applies to directors, staff, volunteers, contractors, facilitators, interpreters and anyone acting on behalf of UMAY.
- UMAY provides prevention, learning, advice and signposting. It complements schools, local authorities and specialist services and does not replace their statutory safeguarding responsibilities or duplicate crisis provision.

2 · Scope and principles

- **Child or young person:** anyone under 18.
- **Adult at risk:** an adult who has care and support needs, is experiencing or at risk of abuse or neglect, and because of those needs may be unable to protect themselves.
- UMAY will act in the best interests of children and, for adults, follow the Care Act principles of empowerment, prevention, proportionality, protection, partnership and accountability. We will listen, respect wishes and identity, make reasonable adjustments and challenge discrimination. Culture, faith, language, family honour or immigration status never justify abuse.
- Safeguarding concerns may include physical, sexual, emotional or psychological abuse; neglect or self-neglect; domestic abuse and coercive control; financial abuse; child-on-child abuse; exploitation, trafficking or modern slavery; online abuse; harmful practices including FGM and forced marriage; radicalisation; discriminatory abuse; and organisational abuse.

3 · Roles and accountability

- **Designated Safeguarding Lead (DSL):** Sinem Aksay, Lead Director.
- **Deputy DSL:** Pınar Cangir Ustun, Director. Both can be contacted on 07932 456270 or at support@umay.org.uk.
- The DSL and Deputy support workers, coordinate referrals, keep secure records and review safeguarding practice. The Board retains oversight and approves this policy. If a concern involves the DSL, it must be reported to the Deputy and another non-implicated Director. If both are implicated, report directly to another Director and the relevant statutory service.
- All workers must follow this policy, complete appropriate training, maintain professional boundaries and report concerns promptly. They must not investigate or decide whether abuse has occurred.

4 · Partnership delivery and work in schools

- Before delivery, UMAY and the host organisation will agree on the activity, supervision, safeguarding contacts, reporting route, emergency arrangements, information sharing and any required checks. The host organisation retains responsibility for its premises, participants and statutory procedures. UMAY remains responsible for the conduct and suitability of its own workers.
- When UMAY works with children or young people in a school, a teacher or other authorised school employee will be present and responsible for the group. UMAY workers will follow the school's safeguarding, visitor, behaviour, online safety and emergency procedures. Any concern will be passed immediately to the school's DSL and UMAY's DSL. The presence of a teacher does not prevent an UMAY worker from taking emergency action or making a direct referral if a child may remain at risk.
- Activities will be age-appropriate, inclusive and risk-assessed. Facilitators will explain that confidentiality cannot be promised, avoid inviting public disclosure of personal experiences, and provide clear routes to support. UMAY will use light, optional and trauma-informed monitoring and will not collect more personal information than necessary.

5 · Recognising and responding to concerns

- If a child, young person or adult shares a concern, or a worker notices possible harm, the worker must:
- Listen calmly, take the person seriously and use their own words. Do not promise confidentiality, investigate, confront anyone or ask leading questions.
- Explain that information will be shared only with people who need it to help keep them or others safe.
- Call 999 if anyone is in immediate danger, seriously injured or a crime is in progress.
- Report the concern as soon as possible to the host safeguarding lead, where relevant, and to the UMAY DSL or Deputy. If a lead is implicated, bypass them.
- Make a factual, dated and signed record, including the person's exact words, observations, action taken and people informed.

- For a child, a concern about significant harm must be referred without delay to children's social care or police. The host school DSL will normally lead the referral in school settings. If the school cannot be reached or does not act and risk remains, UMAY will contact the relevant service directly.
- For an adult, UMAY will seek consent where safe and practicable and respect the adult's desired outcomes. Information may be shared without consent where there is immediate danger, a crime, coercion, risk to a child or other person, lack of capacity, or another lawful reason. Concerns meeting the Care Act threshold will be referred to the relevant local authority adult safeguarding service.

6 · Concerns about workers and whistleblowing

- Any allegation that a worker has harmed, may have harmed or may pose a risk to a child or adult must be reported immediately to the DSL and relevant host lead. The person raising the concern must not investigate or confront the worker. Where children are involved, UMAY and the host will seek advice from the Local Authority Designated Officer (LADO) when the threshold may be met. Police, adult social care, DBS, a professional regulator or commissioner will be contacted where required.
- Concerns about conduct below the allegation threshold, including boundary breaches or behaviour causing unease, must also be reported and recorded so that patterns can be identified. UMAY may restrict duties while a concern is considered. A DBS referral will be made where the legal criteria are met, including where a person leaves before action is completed.
- Workers may raise concerns with any non-implicated Director or directly with statutory services, police, the NSPCC Whistleblowing Advice Line or Protect if internal action is unsafe or ineffective. No one will suffer detriment for raising a concern in good faith.

7 · Safer recruitment, training and conduct

- UMAY will use proportionate safer recruitment, including role descriptions, identity and right-to-work checks, references, employment-history checks, safeguarding questions and DBS checks where the role is eligible. The required DBS level will be decided from the actual duties and current law, not solely from the presence of a teacher. Partners and contractors must provide suitable assurance for their workers.
- Workers will receive safeguarding induction and training proportionate to their role, with regular updates. CYP-facing workers will be briefed on the host setting's procedures before delivery. The DSL and Deputy will maintain role-appropriate knowledge and seek specialist advice when needed.
- Workers must maintain professional boundaries; avoid unnecessary one-to-one or lone contact; use approved organisational communication channels; never exchange personal social-media details with children; and follow agreed rules for touch, transport, photography, online delivery and use of personal data. Any unavoidable one-to-one contact or boundary concern must be reported.

8 · Consent, capacity and information sharing

- UMAY will presume that an adult has capacity unless there is reason to doubt it, support decision-making and act in the person's best interests where a lawful capacity assessment finds they cannot make the relevant decision. UMAY workers do not make formal capacity determinations unless qualified and authorised to do so.

- Safeguarding information will be shared on a need-to-know basis when necessary and proportionate to protect a person or support a statutory response. Data protection law does not prevent appropriate safeguarding information sharing. Consent is not required where another lawful basis applies or seeking it may increase risk or cause harmful delay.
- Records will be factual, secure, access-controlled and kept separately from routine monitoring information. UMAY will record what was shared, with whom, why and what action followed, and retain or destroy records in line with its data-protection and retention arrangements.

9 · Review and related arrangements

- This policy will be reviewed annually and sooner if law, guidance, delivery arrangements or learning from an incident changes. The DSL will report safeguarding themes and actions to the Board without unnecessary personal information.
- This policy operates with UMAY's risk assessments, code of conduct, safer recruitment, whistleblowing, complaints, data protection and information-sharing arrangements. For school delivery, the host's current safeguarding procedures and local referral contacts form part of the working arrangement.
- This policy reflects, as applicable, the Children Acts 1989 and 2004, Working Together to Safeguard Children 2026, Keeping Children Safe in Education 2026, Care Act 2014, Mental Capacity Act 2005, Domestic Abuse Act 2021, Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, UK GDPR and Data Protection Act 2018, and relevant local safeguarding partnership procedures.

Sign-Off

Director: Sinem Aksay

Date: 15.10.2026

Director: Pınar Cangir Ustun

Date: 15.10.2026

Director: Yunus Emre Berk

Date: 15.10.2026