



ICM

# Safeguarding Principles and Policy

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## Statement of Intent

ICM is committed to openness and accountability. In line with this commitment we expect employees, Learners, Examiners or those contracted to provide services to ICM who have serious concerns about any aspect of our work to come forward and voice those concerns with the knowledge that, if made in good faith, their action will be viewed positively.

A handwritten signature in black ink that reads "Adair Ford". The signature is written in a cursive style with a large initial 'A'.

Adair Ford  
**Chairman & CEO**

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## **1. <sup>1</sup>Safeguarding Principles and Policy Statement**

The main aim of ICM is to provide qualifications and support to meet the needs of Learners globally. In delivering these products and services, ICM have an influential role in ensuring the welfare of candidates taking their assessments. Behind each certificate issued there are a number of activities, products and services that are key to the delivery of courses and ultimately to candidates achieving their certificates. Some of these activities are undertaken by permanent staff employed by ICM; others by people who are contracted in a variety of ways. For the purposes of this policy, 'staff' who are not permanently employed by ICM are referred to as 'representatives'.

## **2. There are three key areas in which safeguarding issues may be raised in relation to the work of ICM:**

- the conduct of ICM permanent staff or representatives towards candidates, other children and vulnerable adults with whom they come into contact
- the appropriateness of assessment materials
- candidate disclosure of information regarding their personal welfare, or the welfare of one of their peers, to the permanent staff or representative of ICM, whether directly or through written responses

It is the responsibility of ICM and the ICM Approved Centre to ensure that all its permanent staff and representatives are aware of safeguarding issues for children and vulnerable adults, and procedures in their particular area of expertise and are trained accordingly. The ICM Approved Centre must have effective mechanisms in place to record and monitor safeguarding issues and ensure that appropriate action is taken.

**2.1 Cases not relating to the conduct of a member of permanent staff or representative** will involve formal reporting to the centre and/or the relevant protection authority for resolution. In these cases ICM must be satisfied that the issues have been acknowledged and will ask for confirmation of this from the organisation to which the referral was made.

**2.2 Cases involving the conduct of ICM permanent staff** will be formally investigated and dealt with in line with the documented disciplinary procedures, following discussion with the appropriate protection authorities.

**2.3 Cases involving the conduct of ICM representatives** will also be formally investigated, following discussion with the appropriate statutory protection authorities, and dealt with in line with the terms and conditions of their contracts.

## **3. Roles and Responsibilities**

A centre is the place where a Learner will undertake study, training and assessment. ICM are very conscious of safeguarding issues and will do all within their remit to ensure the safety of children and vulnerable adults. However, as centres have more direct contact with Learners, they have primary responsibility for the welfare of their Learners, progressing and resolving issues and raising awareness generally. ICM and Centres communicate directly with one another on an ongoing basis. Therefore, the contractual relationship which results in Learners taking assessments is between an ICM and a Centre. To maximise the effectiveness of all measures to protect children and vulnerable adults taking qualifications, ICM will work in partnership with centres.

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<sup>1</sup> Produced with reference to JCQ Child Protection Policy Standard - 2015.pdf

#### 4. Relevant Legislation and Guidance

The roles and responsibilities of centres **in England** are defined in keeping children safe in education – Statutory guidance for schools and colleges (Department for Education, April 2014) and Safeguarding of Vulnerable Groups Act 2006.

The roles and responsibilities of centres **in Wales** are defined in Safeguarding Children in Education <http://wales.gov.uk/consultations/education/revised-guidance-on-safeguarding-children-in-education/?lang=en>

The roles and responsibilities of centres **in Northern Ireland** are defined in the Department of Education's Publications on General Child Protection Issues – <http://www.deni.gov.uk/index/support-and-development-2/child-protection-safeguarding/publications-and-guidance-for-schools.htm> Northern Ireland only – Safeguarding Vulnerable Groups (NI) Order 2007, as amended by the Protection of Freedoms Act 2012. Disclosure and Barring Service (DBS) - [www.gov.uk/government/organisations/disclosure-and-barring-service](http://www.gov.uk/government/organisations/disclosure-and-barring-service)

The Children Acts and relevant guidance when working in schools, examination centres or otherwise with children – see the Department for Education's website <https://www.gov.uk/government/organisations/department-for-education> Please note that while the provisions of the Children Acts do not directly apply to ICM, they do form part of the Government's wider safeguarding framework for children. Accordingly, it is important for ICM to be aware of the overall scheme of those Acts and related guidance.

#### 5. Definitions

**A vulnerable adult** is defined as a person who is aged eighteen years or over to whom a 'regulated activity' relating to vulnerable adults (as set out in the Safeguarding of Vulnerable Groups Act 2006) is provided.

**A child** is defined as a person under the age of 18.

**Regulated activity** is a broad term which applies to:

1. specified unsupervised activities relating to children and vulnerable adults (e.g. teaching, training, instruction, care or supervision) which are carried out on a frequent (as a general rule at least once a week), or intensive (more than three days in any 30 day period) basis, or overnight (between 2am and 6am where the activity gives the person the opportunity to have face-to-face contact with children or vulnerable adults); **or**
2. certain work in a specified place which provides the opportunity for frequent contact with children or vulnerable adults (e.g. a school); **or**
3. certain specified positions (e.g. a school governor) and functions (e.g. early years child minding).

Employees of ICM may be engaging in 'regulated activity', if, for example, their role involves frequent visits to schools or examination centres

## **6. Specific Principles of Safeguarding for Children and Vulnerable Adults**

ICM have examined their working environments and regulated activities (including who they work with and how, when, where and under what circumstances permanent staff or representatives work with candidates and interact with them) and the products and services they offer and apply the ten principles of safeguarding for children and vulnerable adults.

### **6.1 Principle 1 A safeguarding policy**

ICM will have a safeguarding policy in place

### **6.2 Principle 2 Risk assessment**

ICM will assess the risk that harm will be caused to children or vulnerable adults as a result of and in the event of any regulated activities.

### **6.3 Principle 3 Procedures and systems**

ICM will have clearly defined reporting procedures and response mechanisms that ensure safeguarding responsibilities are met. At the same time, so far as this is possible given those safeguarding responsibilities, an ICM will ensure that obligations of confidentiality (re-assuring all concerned that the matter will be dealt with sensitively and appropriately) are respected.

### **6.4 Principle 4 Prevention**

ICM will adopt measures to minimise the risk of abuse by any person it retains to engage in 'regulated activity'.

### **6.5 Principle 5 Codes of behaviour**

ICM will have in place Codes of behaviour (Appendix B) that set out acceptable standards of behaviour and good practice for staff and representatives when engaged in 'regulated activity'.

### **6.6 Principle 6 Implementation in diverse contexts**

ICM will give clear guidance to permanent staff and representatives on how the safeguarding policy will be adapted and applied practically in different circumstances.

### **6.7 Principle 7 Equality and inclusion**

In accordance with equality legislation, in the exercise of its function of developing and awarding qualifications, ICM must have due regard to the need to combat discrimination and ensure procedures are equitably applied to all children and vulnerable adults.

### **6.8 Principle 8 Communication**

ICM will make their safeguarding policy publicly available (and in the handbook for Country Coordinators). The policy will be regularly reviewed taking into account comments from appropriate stakeholders.

### **6.9 Principle 9 Education and training**

ICM will provide appropriate initial and refresher training and development opportunities to staff and representatives who engage in 'regulated activity'.

### **6.10 Principle 10 Implementation and monitoring**

ICM will monitor the implementation of their safeguarding policy.

## **7. <sup>2</sup>Safeguarding Policy**

ICM qualifications are designed for Learners aged 17 years and over. It is not ICM's responsibility to investigate abuse. Nevertheless, it has a duty to act if there is a cause for concern and to notify the

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<sup>2</sup> This policy has been produced with reference to the British Council Guide to assist providers in writing a safeguarding policy (C1)

appropriate agencies so that they can investigate and take any necessary action. ICM takes seriously its duty of care and will be proactive in seeking to prevent children, young persons and vulnerable adults becoming the victims of abuse or neglect. It will do this through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds and by informing service users of their rights to be free from harm and encouraging them to talk to ICM staff if they have any concerns.

## **8. Recruitment and Selection of Staff**

All prospective staff, recruited to work with Learners, will complete an application form which asks for information about the applicant's post, a self-disclosure about any criminal record and an agreement to be checked by the Disclosure & Barring Service (DBS). The DBS check will be completed during the probationary period. Two references will be requested, either from their previous employer or from someone known to them personally, but not a relative. Evidence of identity will be required, such as a passport or a driving licence with a photograph. Senior staff working in ICM UK who travel to Centres in the UK and globally must have an enhanced DBS check prior to travel.

## **9. Reporting Procedures**

If the allegation or suspicion of abuse is discovered or disclosed by a service user then they should inform a senior member of ICM staff as soon as possible. A member of staff discovering an allegation or suspicion of abuse will, similarly, report it to the senior member of ICM staff. If the allegation is regarding a senior member of ICM staff then another member of senior staff and/or a member of the board of trustees should be informed.

The member of staff should make a written record (see relevant section below) of the allegation or suspicion of abuse and discuss with the ICM Chief Executive who will carry out a risk assessment and contact the local Social Services Team if appropriate. If a service user/staff member has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the service user to make a referral to another agency. However, the gaining of the consent is not essential in order for information to be passed on. Consideration needs to be given to the scale of the alleged abuse, the risk of harm to others and the capacity of the service user to understand the issues of abuse and consent. If there is any doubt about whether or not to report an issue to Social Services then it should be reported. In emergency situations (e.g. where there is the risk or occurrence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted. Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

## **10. Procedure for Allegations against a Member of ICM Staff**

- Record in full, as soon as possible, the nature of the allegation and any other relevant information.
- Report the allegation/incident to the Senior member of ICM staff (or a trustee if the allegation involves the Senior member of ICM staff) as soon as possible and within 2 hours.
- Inform the appointed board member if the Senior member of ICM staff is not available.
- Ensure the safety of the service user in question and any others who may be at risk.
- Report the matter to social services.

Consideration will be given on whether the member of staff should be suspended on full pay pending the investigation. Suspension should not necessarily be an automatic response to an allegation and all allegations should be dealt with quickly, fairly and consistently.

### **11. DBS Checks**

Currently all existing, newly recruited staff, directors and Country Coordinators who have contact with Centres and Learners are DBS checked (or a disclosure is undertaken). In the case of Country Coordinators, the risk is assessed by the ICM Chief Executive on a case by case basis.

### **12. Written Records Responding to an Allegation**

The member of staff who has cause for concern shall make a full record as soon as possible. The record should include the nature of the allegation and any other relevant information including:

- Date, time and place where the alleged abuse occurred
- Names of others present
- Name of the complainant and, where different, the name of the person who has allegedly been abused
- Nature of the alleged abuse
- Description of any injuries/incidents observed; and the account which has been given of the allegation

### **13. Confidentiality**

Staff must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary according to the policy.

- **React**

ICM qualifications may be delivered in Centres where Learners aged less than 17 years attend, therefore, ICM bring this guidance on handling a disclosure from a child as produced by the British Council to the attention of ICM Approved Centres and ICM Country Coordinators via in this policy. What should you do if a child comes to you and tells you that they are being abused? It's normal to feel overwhelmed and confused in this situation. Child abuse is a difficult subject that can be hard to accept and even harder to talk about. Children who are abused are often threatened by the perpetrators to keep the abuse a secret. Thus, telling an adult takes a great amount of courage. Children have to grapple with a lot of issues, including the fear that no one will believe them. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

- **Receive**

Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down. Accept what is being said without judgement. Take it seriously.

- **Reassure**

Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they



did nothing wrong and that you take what is said seriously. Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns. Tell the child that you will need to tell some people, but only those whose job it is to protect children. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions. Do ask open questions like "Is there anything else that you want to tell me?" Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English. Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to. Refer directly to the named child protection officer or designated person in your organisation (as set out in the organisation's child protection policy). Do not discuss the case with anyone outside the child protection team.

#### **14. Record**

Make some very brief notes at the time and write them up in detail as soon as possible. Do not destroy your original notes in case they are required by Court. Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang.

Record statements and observable things, not your interpretations or assumptions – keep it factual.

#### **15. Code of Behaviour for ICM Country Coordinators**

This code of conduct outlines the behaviour expected of staff and Country Coordinators from ICM who work in, visit or assist with projects involving children, young people and vulnerable adults. It has been informed by the views of children and young people and is based on best practice input from Safe network, the National Safeguarding Unit for the Third Sector, managed by the NSPCC. It should be used in conjunction with the ICM Safeguarding Policy. We hope that by following this code you will understand and maintain the standard of behaviour expected of you, help to protect the children and vulnerable adults that we work with from abuse and inappropriate behaviour, and reduce the possibility of unfounded allegations of abuse being made against you. When working in contact with children and vulnerable adults the ICM Country coordinators are likely to be seen as role models by children and young people, and must act in an appropriate manner at all times.

The following list provides a guide for what we consider to be important and appropriate:

- follow the guidance provided by ICM and any procedures that Centre Staff may have in place
- ensure your contact with children and vulnerable adults is only in direct pursuit of your role for ICM

- avoid favouritism and treat all children and adults fairly and without prejudice or discrimination
- listen to and respect children and vulnerable adults at all times
- value and take children's contributions seriously
- ensure your language is appropriate to age and ability, and not offensive or discriminatory
- provide examples of good conduct you wish children and young people to follow
- respect a person's right to personal privacy
- encourage young people and adults to feel comfortable enough to point out attitudes or behaviour they do not like
- recognise that special caution is required when you are discussing sensitive issues with children or young people
- Seek advice from your Coordinator on issues that require additional sensitivity locally, such as naming people with HIV in Kenya
- always ensure equipment is used safely and for its intended purpose
- ensure that whenever possible there is more than one adult present during activities with children and vulnerable adults or, if this isn't possible, that you are within sight or hearing of other adults, some behaviours that are considered acceptable in the country you are visiting may not be acceptable to us
- Seek advice from the centre or ICM UK if you are uncomfortable with something you have experienced
- Appropriately challenge unacceptable behaviour and report allegations/suspensions of abuse
- report any breaches of this code of conduct promptly so that these can be appropriately investigated

The following list provides a guide for what you must **not do** under any circumstances:

- develop inappropriate relationships such as contact with children and vulnerable adults that is not a direct part of your role as an ICM Coordinator
- do things of a personal nature for a child or vulnerable adult
- administer any medication
- patronise young people or adults
- let children and vulnerable adults have your personal contact details (mobile number or address)
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and adults
- act in a way that can be perceived as threatening or intrusive
- make inappropriate promises to children and young people, particularly in relation to confidentiality
- jump to conclusions about others without checking facts
- either exaggerate or trivialise abuse issues
- conduct a personal or sexual relationship with a child, young person or vulnerable adult
- allow allegations about abuse or misconduct to go unreported
- rely on your reputation or that of the ICM to protect you

All members of staff and Country Coordinators are expected to abide by these guidelines and report any observed breaches of this code to the ICM Chief Executive, Adair Ford [adair.ford@icm.education](mailto:adair.ford@icm.education). Country Coordinators who breach this code of behaviour may be asked to leave their role with immediate effect. Staff may be subject to ICM's disciplinary procedures. Where it is reported that a local member of staff or the manager of a project are in breach of this code then the Directors of ICM will investigate the breach and support for the project may be withdrawn. Any serious breaches may result in a referral being made to a statutory agency such as the police or an independent safeguarding authority.