



Chartered
Institute
of Credit
Management

Safeguarding policy

Our commitment

CICM commits to safeguarding and promoting the welfare of those working in collections and credit management, in particular CICM learners and mentees.

CICM understands the crucial role of managers, teachers and mentors in shaping lives and their unique opportunity to inspire.

This document relates in particular to contact with young people under the age of 18 and adults at risk, however the principles apply to all professional relationships. The policy focuses on safeguarding, and together with CICM policies on equality and diversity and preventing terrorism, CICM aims to establish a safe and responsive professional environment which reduces the risk of you being unjustly accused of improper and unprofessional conduct.

Objectives

The policy aims to:

- Raise your awareness of safeguarding issues
- Build understanding of your responsibilities and that of others
- Explain CICM procedures for reducing risks and investigating issues.

Key contacts

Lead Safeguarding Officer

Tanya Clegg – safeguarding@cicm.com

Safeguarding Officers – 01780 722909

Mary Delahunty – Lead Teacher and Education Adviser
safeguarding@cicm.com

Deidre Berridge – Education Co-ordinator
safeguarding@cicm.com

Hilary Lewis – Corporate Member Co-ordinator
safeguarding@cicm.com

Alison Wisden – Learning Co-ordinator
safeguarding@cicm.com

What does safeguarding relate to?

Safeguarding relates to procedures to protect the health, well-being and human rights of individuals in a way that allows people, **especially children under the age of 18 and adults at risk** to live a life free from abuse, neglect and harm.

Potential risks include:

- Abuse (physical, emotional, sexual, organisational, financial)
- Bullying including cyberbullying
- Discrimination
- Radicalisation
- Faith abuse
- Mental health concerns
- Gender based violence
- Domestic abuse
- Forced marriage
- Child sexual exploitation
- Substance misuse
- Fabricated or induced illness
- Teenage relationship abuse
- Gang and youth violence
- Sexting
- Private fostering
- Trafficking and modern slavery.

See guidance at the end of this policy on indication of abuse.

Adults can become at risk of abuse or neglect due to personal circumstances or their particular need for support. This may be identified by situations such as:

- Receipt of any form of health care or a service due to disability or age
- Receipt of a welfare service such as care in their own home or to support their need to live independently
- Living in sheltered housing or residential accommodation
- Being an expectant or nursing mother living in residential care
- Being supervised by the probation services.

The government regulates activity involving young people who are under the age of 18 and adults at risk. This means that some people are barred from carrying out work which involves regular, unsupervised contact, i.e. more than three times a month, if activity relates to these groups. This policy aims to control this regulated activity.

Our responsibilities

Our responsibilities are to:

- Raise awareness of safeguarding issues.
- Protect people from harm, in particular young people under the age of 18 and adults at risk, by building understanding of potential risks to their welfare and how to seek help.
- Deal with any concerns in a timely and appropriate manner.
- Minimise the risk of allegations against you.

Our code of conduct

In order to meet the above responsibilities CICM will:

- Make this policy widely available on CICM Knowledge Hub and raise awareness of safeguarding issues in a range of ways.
- Provide training for new teachers and mentors on safeguarding, prevent, equality and diversity issues and related CICM policies.
- Encourage CICM learners to complete training on safeguarding, prevent, equality and diversity issues so that they understand how to keep safe and seek help.
- Carry out appropriate recruitment checks for all involved in regulated work, e.g. apprenticeship teaching, because they are likely to have contact with young people under the age of 18 or adults at risk.
- Deal with any safeguarding related concerns in a timely and appropriate manner,
- Review arrangements and policies related to these issues annually.

Our methods

Raising awareness

CICM will make this policy widely available and raise awareness of safeguarding issues in the following ways:

- Publish CICM policies on safeguarding, prevent, equality and diversity on CICM Hub Knowledge Hub.
- Include messages about knowing your rights on equality and diversity matters, safeguarding and prevent risks, and how to get help in monthly Study Updates.
- Encourage employers who are CICM Members and the CICM HQ team to complete elearning on safeguarding, prevent, equality and diversity on CICM Hub Knowledge Hub by promoting these courses.

- Encourage learners to complete elearning on safeguarding, prevent, equality and diversity issues so that they understand how to keep safe and seek help.

Training

CICM protects people from harm by:

- Training all new teachers and mentors on safeguarding, prevent, equality and diversity issues and related CICM policies.
- Requiring teachers who undertake regulated work to confirm that they understand and commit to the CICM Safeguarding Code of Conduct.
- Encouraging all teachers and the CICM Learning and Development team to complete elearning on safeguarding, prevent, equality and diversity.

Support

CICM supports CICM members including tutors, mentors, learners and mentees by having trained safeguarding officers who can be reached through a dedicated email address - safeguarding@cicm.com for advice and support on safeguarding matters.

Recruitment

CICM has specific recruitment procedures for persons who are in regular and/or unsupervised contact with young people (under 18 years of age) or adults at risk as follows:

- CICM requires any persons in regulated roles or who are applying for such roles to declare any convictions, including those normally considered as spent, cautions or reprimands which are relevant to working with young people or adults at risk. CICM regards failure to disclose these matters as a breach of trust and confidence and considers such omission as gross misconduct which would result in a disciplinary hearing with the potential outcome of instant dismissal.
- CICM recruits for roles following standard recruitment procedures, however an offer of employment could be withdrawn depending on the nature and circumstances of any criminal activity.
- CICM contacts the Disclosure and Barring Service (DBS) on recruitment to such roles to make an Enhanced DBS check which includes a children's barred list check. This supplies details about an individual's convictions, cautions, reprimands or warnings recorded on police central records and held locally by police including 'spent' and 'unspent' convictions. See roles which apply in the following table and how CICM stores securely, retains and disposes of DBS information at the end of this policy

The process involves:

- CICM sends application form to the applicant to fill in.
 - The applicant returns the completed form with required documents providing their identity.
 - CICM sends the completed application form to a DBS 'umbrella body'¹.
 - DBS sends a certificate to the applicant (process takes around 8 weeks).
 - CICM asks the applicant to show the certificate to check it is genuine and records date of review and reference number.
- All discussions related to convictions take place after the selection process has been completed and normally involves meeting the individual to gain more information about the nature and circumstances of any conviction.
- The CICM Head of Learning and Development, in consultation with the Head of Human Resource, carefully considers any information in the DBS check and makes a decision about recruitment for regulated work on the basis of:
- The seriousness of the offence and relevance to the safety of others
 - Length of time since the offence occurred
 - Relevant information offered by the person about circumstances that led to the offence(s) being committed, e.g. influence of domestic or financial difficulties.
 - The degree of remorse or otherwise expressed by the person and their motivation to change.
 - Whether the offences was a one-off, or part of a history of offending
 - Whether a person's circumstances have changed since the offence(s) was committed, making re-offending less likely.
 - Whether the offence has since been decriminalised.

Also the decision to about allocation of work depends on the following job-related factors:

- How much direct contact with learners or the public
 - Level of supervisions the post-holder will receive
 - Level of trust involved, i.e. level of risk that post-holder will reoffend at work
 - If post involves direct responsibility for finance or items of value
 - If post involves any contact with young people under 18 years or adults at risk.
- CICM supervises newly appointed personnel pending results of DBS check, i.e. person is not left completed alone with learners and never in a one-to-one situation.
- If appropriate CICM may seek further information from relevant bodies when reaching a decision. If the decision is not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

¹ CICM must use a company known as an 'umbrella body' because fewer than 100 checks are made a year.

Ongoing monitoring

CICM requires those involved in regulated activity to complete and return to the CICM Credit Academy an annual 'Safeguarding regulated activity annual declaration (See form at end of policy) to:

- Ensure that the person appointed by CICM is at all times suitable to be engaged in the role, by requiring disclosure of certain matters, such as criminal convictions or bankruptcy which may render a person unsuitable for work with regulated groups or some companies.
- Confirm understanding and commitment to the CICM Safeguarding Code of Conduct.

In the event of a criminal conviction coming to light after the formal offer of employment has been made or during employment, CICM will follow the process above to consider the circumstances. In such cases, CICM reserves the right to withdraw the offer of appointment where appropriate or terminate employment in line with CICM's Disciplinary Policy (or probationary policy if in probationary period).

Posts requiring DBS and Barring list check

	No check	Standard DBS check	Enhanced DBS check and children's barred list check (after recruitment)	Annual safeguarding and regulated activity declaration
In-company or virtual teachers involved in regular tuition of a child or adult at risk			✓	✓
Learning support tutors (email and telephone contact) of a child or adult at risk			✓	✓
Regulated volunteers, e.g. mentors of a child or adult at risk			✓	✓
Moderator of an online chatroom or online media which could involve a child or adult at risk (if ≥ 3 times a month)			✓	✓
In-company, virtual or learning support tutors for companies with stringent security arrangements (special arrangement)		✓		✓

End-point assessment professional discussion assessors (face-to-face) of a child or adult at risk			√	√
End-point assessment professional discussion assessors (remote) of a child or adult at risk	√			
CICM administration team (no regular face-to-face contact)	√			
Other in-company, virtual or learning support tutors (non-regulated work)	√			
Account managers (occasional site visit) – never left in one to one situation with child or adult at risk	√			
Non-regulated volunteers, e.g. adult mentors	√			

CICM uses the online government tool to assess the type of DBS check required which is found at <https://www.gov.uk/find-out-dbs-check>.

Handling concerns

CICM takes all safeguarding concerns and allegations seriously and will report these to a CICM Safeguarding Officer regardless of the agreement of the person concerned.

In all circumstances you must not pass any information to other parties or try to investigate a concern yourself. All concerns should be reported to safeguarding@cicm.com in the first instance.

The following give examples of how to handle concerns:

■ If a person raises a concern/allegation with you

- If a person has concern over their own personal welfare and wellbeing, listen to and record all information, making no judgement or assumptions.
- Take any actions required to secure the immediate safety of the person, this may involve staying with them in the case of a young person under 18 or adult at risk until a responsible adult can be located.
- The incident will only be raised with a manager, if the person agrees but you must report the issue to a CICM Safeguarding Officer regardless of the agreement of the person concerned. This person will decide the appropriate course of action and if referral outside CICM is appropriate.

■ If you have a concern about another person

This may be through observation, alleged by others or in discussions. Follow the procedure above if a person raises an issue/allegation.

■ **If a person has a concern/allegation about a CICM team member**

CICM advises all to contact a CICM Safeguarding Officer if they have a concern over their own personal wellbeing. Contact details are at the beginning of this policy.

■ **If a parent contacts you to report a concern about their child**

Listen and record details as explained the first scenario and ensure you collect contact details for the parent. You must report the issue to a CICM Safeguarding Officer. This person will decide the appropriate course of action and if referral outside CICM is appropriate, liaising with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above and of employed status are deemed to be adults and therefore no information should be passed to parents or carers without prior consent to do so from a learner.

■ **If you observe a safeguarding issues in working practices of a company**

This might involve somebody hitting a young person under 18 or observation of an inappropriate restraint technique.

- Take action to stop the activity immediately
- Inform the individual of your concerns, ask them to remove themselves for the area and advise them that you will inform their senior manager.
- Take any actions to secure the safety of the young person or adult at risk, this may involve staying with them until a responsible adult can be located.
- Inform a CICM Safeguarding Officer.
- Be aware of differences between poor practices and a safeguarding issue and therefore respond appropriately.

■ **If a person reports unsafe practices or safeguarding issues in their working environment**

- Advise the person to follow in-house reporting or whistle blowing procedures - you may support the person in speaking to the appropriate senior team members.
- Report the incident to a CICM Safeguarding Officer they will offer the person additional guidance and signposting, and will monitor the situation.

Please note that CICM Safeguarding Officers may not be available outside of normal working hours and so in circumstances where a person is in immediate danger, who should report the incident to the police on 999.

A CICM Safeguarding Officer will endeavour to make initial contact about concerns within 72 hours. This will involve making an assessment if the individual is at risk of significant harm and decide on the next course of action which may involve the following:

- Signposting to support agencies.
- Referral to the police and local safeguarding authorities.
- Passing information to the DBS.

The Lead Safeguarding Officer keeps a record of all safeguarding concerns, action taken and information, advice and guidance given.

Reviewing policy

CICM Safeguarding Officers review the policy annually or as required in response to feedback from stakeholders, including the CICM Credit Academy Board.

The following pages includes CICM Credit Academy's safeguarding and regulated activity declaration and course of advice and support contact information.

Other CICM related policies are: data protection policy, equality and diversity policy, health and safety policy, and prevent policy.

CICM Credit Academy

Safeguarding and regulated activity declaration

Name _____

Job title **CICM Tutor**

In order to ensure that the person appointed as a CICM Tutor is at all times suitable to be engaged in the role, CICM requires you to disclose below any of the following which may render you unsuitable for work with regulated groups or some companies:

- a) any criminal convictions.
- b) any finding by a court or any professional, regulatory, or government body where you have breached a provision of any legislation or any regulatory obligation to which you are subject.
- c) any proceedings in bankruptcy or any individual financial arrangement to which you have been subject.
- d) any disqualification from holding the directorship of a company or from public office.
- e) any finding of malpractice or maladministration, in relation to a qualification (whether a regulated qualification or a qualification which is not regulated), to which you have been subject.

Declaration

Sign below to confirm that:

- a) the information that you have provided above is correct.
- b) you understand that in the future you must disclose to a senior manager of the CICM Credit Academy if any of the above applied because it may render you unsuitable for the role.
- c) You understand and commit to the CICM Safeguarding Code of Conduct overleaf.

Signed _____

Date _____

CICM Safeguarding Code of Conduct

CICM commits to safeguarding and promoting the welfare of those working in collections and credit management, in particular CICM learners and mentees. CICM understands the crucial role of managers, teachers and mentors in shaping lives and their unique opportunity to inspire.

This code of conduct aims to establish a safe and responsive professional environment which reduces the risk of you being unjustly accused of improper and unprofessional conduct.

- Although you will naturally build rapport through CICM work and people may see you as a confident and support, be sure to maintain professional boundaries when working for CICM.
- Be respectful and appreciate that you are in a position of trust. Listen to their concerns and support them, following CICM policy guidance.
- Uphold confidentiality when required by the situation, within limits and be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone in a closed environment with a young person or adult at risk. If this is unavoidable, for example during an assessment, ensure another person on site is aware of where you are and monitors this.
- Be careful when giving advice because this is based on your opinion and instead focus on information (facts) and guidance (signposting).
- If at any time you feel unsafe in another person's company, inform the site manager, your main CICM contact, a CICM Safeguarding Officer and leave the premises.
- In order to maintain others and your safety, understand that the following is strictly prohibited:
 - Personal relationships with learners or mentees, beyond that appropriate for a normal teacher/learner or mentor/mentee relationship.
 - Befriending learners or mentees on social media sites or engaging with a young person or vulnerable adult by personal electronic means e.g. Facebook email or text, unless through official CICM channels.
 - Spend time along outside of the normal tutorial/mentoring environment.²
 - Visiting a learner or mentee at home or transporting them to and from locations (this includes travelling in a car with a learner driving) without another CICM team member or volunteer present.³
 - Distribution of personal telephone numbers.

² If you find yourself alone in these circumstances, make sure you can be clearly seen by others

³ Also it is essential that you have adequate vehicle insurance to cover transporting young people or adults at risk as part of the business of your work. In extreme emergencies, if you have to transport young people or adults at risk on their own, you must notify another CICM teacher, officer or parent immediately.

- Use of sarcasm, insults or belittling comments.
- Use of sexually suggestive comments to or within earshot of another person
- Inappropriate touching of any kind.
- Physical restraint unless the restraint is to prevent physical injury to the person, other people or yourself.
- Doing any things of a personal nature that a person cannot do for themselves or their parent could do for them

Secure storage and disposal of personal information

CICM uses the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust. The following explains our policy for the secure storage, use, retention and disposal of personal information, in particular disclosure information.

Storage and access

CICM never keeps disclosure information on an applicant's personnel file. We always keep this separately and securely in a lockable, non-portable storage container and limit access to those who are entitled to see it as part of their duties.

Handling and use

We abide with Section 124 of the Police Act 1997 and only pass disclosure information to those who this policy states are required to receive this information as part of their duties. The Head of Governance is responsible for maintaining a record of all those who have had disclosures revealed. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

Disclosure information is only used for the specific purposes for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment or other relevant decision has been made, CICM does not keep disclosure information for any longer than necessary. This is generally for a period of up to 6 months to give an opportunity to resolve any disputes. For exceptional circumstances CICM will consult with the DBS to check if the records can be retained for a longer period.

Disposal

Once the retention period has elapsed, CICM will dispose of the information immediately by secure means, i.e. shredding or confidential waste disposal. CICM will not keep a photocopy of the disclosure or leave the information in an insecure receptacle pending disposal. However CICM will keep a secure record of the disclosure's date of issue, name of subject, unique reference number type of disclosure requested, position for which the disclosure was requested and details of the recruitment decision taken.

Types and indicators of abuse

The following guidance from Social Care Institute for Excellence (SCIE)⁴ helps identify different forms of abuse.

Type of abuse	Possible indicators
<p>Physical</p> <ul style="list-style-type: none"> • Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing. • Rough handling. • Scalding and burning. • Physical punishments. • Inappropriate or unlawful use of restraint. • Making someone purposefully uncomfortable (e.g. opening a window and removing blankets). • Involuntary isolation or confinement. • Misuse of medication (e.g. over-sedation). • Forcible feeding or withholding food. • Unauthorised restraint, restricting movement (e.g. tying someone to a chair). 	<ul style="list-style-type: none"> • No explanation for injuries or inconsistency with the account of what happened. • Injuries are inconsistent with the person's lifestyle. • Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps. • Frequent injuries. • Unexplained falls. • Subdued or changed behaviour in the presence of a particular person. • Signs of malnutrition. • Failure to seek medical treatment or frequent changes of GP.
<p>Domestic</p> <ul style="list-style-type: none"> • Psychological • Physical • Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck. • Torn, stained or bloody underclothing. • Bleeding, pain or itching in the genital area. • Unusual difficulty in working or sitting. • Foreign bodies in genital or rectal openings. • Infections, unexplained genital discharge, or sexually transmitted diseases. • Pregnancy in a woman who is unable to consent to sexual intercourse. • The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude. • Incontinence not related to any medical diagnosis. • Self-harming. • Poor concentration, withdrawal, sleep disturbance. • Excessive fear/apprehension of, or withdrawal from, relationships. • Fear of receiving help with personal care. • Reluctance to be alone with a particular person. 	

⁴ <https://www.scie.org.uk>

[Accessed 13/02/2018]

<p>Psychological or emotional</p> <ul style="list-style-type: none"> • Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends. • Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance. • Preventing someone from meeting their religious and cultural needs. • Preventing the expression of choice and opinion. • Failure to respect privacy. • Preventing stimulation, meaningful occupation or activities. • Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse. • Addressing a person in a patronising or infantilising way. • Threats of harm or abandonment. • Cyber bullying. 	<ul style="list-style-type: none"> • An air of silence when a particular person is present. • Withdrawal or change in the psychological state of the person. • Insomnia. • Low self-esteem. • Uncooperative and aggressive behaviour. • Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person. • Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house. • Unnecessary property repairs.
<p>Modern slavery</p> <ul style="list-style-type: none"> • Human trafficking. • Forced labour. • Domestic servitude. • Sexual exploitation, such as escort work, prostitution and pornography. • Debt bondage – being forced to work to pay off debts that realistically they never will be able to. 	<ul style="list-style-type: none"> • Signs of physical or emotional abuse. • Appearing to be malnourished, unkempt or withdrawn. • Isolation from the community, seeming under the control or influence of others. • Living in dirty, cramped or overcrowded accommodation and/or living and working at the same address. • Lack of personal effects or identification documents. • Always wearing the same clothes. • Avoidance of eye contact, appearing frightened or hesitant to talk to strangers. • Fear of law enforcers.
<p>Discriminatory</p> <ul style="list-style-type: none"> • Unequal treatment based on age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion and belief, sex or sexual orientation. • Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic. • Denying access to communication aids, not allowing access to an interpreter, signer. • Few social, recreational and education activities. • Public discussion of personal matters. 	

<ul style="list-style-type: none"> • Unnecessary exposure during bathing or using the toilet. • Absence of individual care plans. • Lack of management overview and support. 	
<p>Neglect/acts of omission</p> <ul style="list-style-type: none"> • Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care. • Providing care in a way that the person dislikes. • Failure to administer medication as prescribed. • Refusal of access to visitors. • Not taking account of individuals' cultural, religious or ethnic needs. • Not taking account of education, social and recreational needs. • Ignoring or isolating the person. • Preventing the person from making their own decisions. • Preventing access to glasses, hearing aids, dentures, etc. • Failure to ensure privacy and dignity. 	<ul style="list-style-type: none"> • Poor environment – dirty or unhygienic. • Poor physical condition and/or personal hygiene. • Pressure sores or ulcers. • Malnutrition or unexplained weight loss. • Untreated injuries and medical problems. • Inconsistent or reluctant contact with medical and social care organisations. • Accumulation of untaken medication. • Uncharacteristic failure to engage in social interaction. • Inappropriate or inadequate clothing.
<p>Self-neglect</p> <ul style="list-style-type: none"> • Lack of self-care to an extent that it threatens personal health and safety. • Neglecting to care for one's personal hygiene, health or surroundings. • Inability to avoid self-harm. 	

Sources of advice and support contact information

Adult learning – Learning and Work Institute – www.learningandwork.org.uk

Autistic Society – www.autism.org.uk

Bereavement – www.cruse.org.uk

Blind and deaf – see Deaf and blind below

Bullying and child abuse – www.bullying.co.uk and www.kidscape.org.uk

Carers – www.carers.org and youngcarers@carers.org

Child exploitation and online protection centre – www.ceop.police.uk

Counselling

National Association for Counselling and Psychotherapy - www.bacp.co.uk

NHS service search – www.nhs.uk

Deaf and blind support – www.sense.org.uk

Domestic abuse – www.ncdv.org.uk

Drugs – talk to Frank for help and support – www.talktofrank.com

Elder abuses – provides support to prevent abuse of vulnerable older adults – www.elderabuse.org.uk

Employment advice – Jobcentre plus – www.direct.gov.uk/en/employment
And www.acas.org.uk

Financial – for free financial advice – www.financialadvice.co.uk and www.stepchangedebtcharity.co.uk

Housing benefits

Housing and homelessness charity – Shelter – www.shelter.org.uk

Government assistance – www.direct.gov.uk

Internet safety – www.thinkuknow.co.uk and www.chatdanger.com

Learning difficulties

Respond – supporting people with learning difficulties – www.respond.org.uk

Legal

www.citizensadvice.org.uk

Medical assistance and health issues - www.england.nhs.uk

Mental health – www.mind.org.uk

Parent support – www.familylives.org.uk

Personal safety – key advisor on personal safety, safety policies and safety at work – www.suzylamplugh.org

Relationship problems – www.relate.org.uk

Samaritans – www.samaritans.org

Sexual abuse – childhood and adult survivors of sexual abuse and rape - www.thesurvivorstrust.org

Sexuality – www.stonewall.org.uk

Victim support - www.victimsupport.org.uk

Whistleblowing – Public Concern at Work (Whistleblowing charity) - www.pcaaw.co.uk

Young person's support

Childline – www.childline.org.uk

Child rights – www.crae.org.uk

NSPCC - www.nspcc.org.uk

Prince's Trust – www.princes-trust.org.uk

Young people in care – Coram Voice - www.coramvoice.org.uk