



UNIFIED SAFEGUARDING POLICY

OF

BASMOM & COMPANIONS

Registered Charity No: 1103567

OSCR: Office of the Scottish Charity Register No: SC040124

-AND-

ORDER OF MALTA VOLUNTEERS

Registered Charity No: 1164242

-AND-

GRAND PRIORY OF BLESSED ADRIAN FORTESCUE OF THE ORDER OF MALTA TRUST

Registered charity no. 1166645

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1. **INTRODUCTION**

- 1.1 This safeguarding policy is applicable to and governs the activities and conduct of the each of the following organisations (referred to hereinafter separately and collectively as the Order) and all those persons who volunteer or otherwise work on behalf of the Order:
 - 1.1.1 British Association of the Sovereign Military Order of Malta (BASMOM) an incorporated charity registered under the name BASMOM and number 1103567 its committees and affiliates. BASMOM has sole charge of the hospitaller activity in England, Scotland & Wales of the Sovereign Military Order of Malta a lay religious order, including, for example, pilgrimages to Lourdes and Walsingham, care of the elderly, supporting the homeless, organising soup kitchens, contributing to international hospitaller initiatives and so forth.
 - 1.1.2 The Companions of the Order of Malta (the CoM) constituted as part of BASMOM and supported by subscriber members known as Companions. The CoM is dedicated to delivering the charitable work of BASMOM through the voluntary work of Companions and those who volunteer to work with us. The main aims of the CoM are the care of the marginalised and homeless, the poor and the elderly, as well as supporting BASMOM pilgrimages and religious services.
 - 1.1.3 The Order of Malta Volunteers (the OMV) an incorporated charity under the name OMV and number 1164242. The OMV is an organisation of young people who dedicate some of their time to helping disabled people and people with terminal illnesses. The OMV aims to help its volunteers (generally young people between 17 and 29) put Christian charity into action. The OMV also aims to ease the pain and hurt of people living with illness or those suffering from social exclusion by inviting them to take part as guests on OMV activities.
 - 1.1.4 The Grand Priory of Blessed Adrian Fortescue of the Order of Malta Trust, a registered charity under no.1166645, which has as its objects the advancement of the Roman Catholic Religion, of any charitable works of the Order, and the relief of poverty.
- 1.2 All four organisations named above work closely together and share the same Roman Catholic beliefs and mission to practise our faith and to practise charity.

2. **SAFEGUARDING POLICY STATEMENT**

- 2.1 The Order believes unreservedly in the personal dignity, fundamental freedoms and rights of all human beings. Trustees take seriously their special responsibility to protect and safeguard children, young people and vulnerable adults. They will do all in their power both to provide a safe and caring environment for all those in their care and with whom they work and to prevent abuse of any kind (see the definitions below).
- 2.2. Although no safeguarding procedures can eliminate safeguarding risks completely, when properly applied these procedures should ensure that all of users are safeguarded as far as they can be. Appropriate preparation in terms of safeguarding and risk management is absolutely vital; but the real value is in their proper application during the activities in question and across our activities as a whole. No failsafe procedure can protect against every eventuality; but all members and volunteers must do their utmost to apply these procedures to safeguard our people as far as possible.
- 2.3 The Trustees will liaise closely with all those in authority, reporting any act which they have reasonable grounds to think may breach the Order's Safeguarding Policy (as set out herein). The Order will co-operate with all relevant statutory authorities and agencies to ensure that any allegations are properly and expeditiously investigated and dealt with and, where appropriate, the perpetrators held to account including criminal prosecution and penalty.

3. **AIMS OF THIS SAFEGUARDING POLICY**

- 3.1. The primary aim of this policy (and all policies and procedures contained herein) is to prevent abuse (see the definitions below) by providing a safe environment for all children, young people and vulnerable adults who come into contact with the Order.
- 3.2 The policy outlines the duties and responsibilities of the Order including all members, volunteers, trustees or staff working on behalf of the Order in relation to safeguarding of children, young people and vulnerable adults.
- 3.3 The policy seeks to ensure that the Order undertakes its responsibilities with regard to the safeguarding of children, young people and vulnerable adults and responds to any concerns appropriately.
- 3.4 The policy establishes a framework to support all persons who volunteer or otherwise work on behalf of the Order in their practices and clarifies the Order's expectations in respect of safeguarding in order to give confidence to volunteers and those working on behalf of the Order and to allow healthy and supportive relationships to flourish without fear.

- 3.5 The Order will strive to achieve these aims in particular by the following measures:
- 3.5.1 The rigorous selection of suitable members, volunteers, trustees and staff and any other persons who volunteer or otherwise work on behalf of the Order.
 - 3.5.2 Raising awareness of safeguarding amongst all those who volunteer or otherwise work on behalf of the Order.
 - 3.5.3 Providing information which enables all persons who volunteer or otherwise work on behalf of the Order to recognise signs of possible abuse and the need for additional support/services and to respond appropriately to these issues.
 - 3.5.4 Describing the procedures to be followed when any person volunteering or working on behalf of the Order becomes aware that a child, young person or vulnerable adult may be experiencing abuse or is in need of additional support/services.
 - 3.5.5 Providing all persons who volunteer or otherwise work on behalf of the Order with appropriate guidance, to reduce risks by following safe practice guidelines.

4 LEGISLATION

- 4.5 The policies and procedures herein have been developed to comply with applicable legislation and best practice as contained in Westminster Archdiocese's safeguarding protocols and the wider Catholic Safeguarding Advisory Service's safeguarding procedures manual and are intended to be fully consistent therewith.
- 4.6 If and in so far as there is any conflict between applicable legislation and the policies and procedures stated herein, the former necessarily take precedence over the latter. For the avoidance of doubt, however, the signatories hereto are not aware of any such conflict as at the date of signature.

5 EQUALITY AND DIVERSITY POLICY

- 5.5 No one volunteering or otherwise working on behalf of the Order will be treated less favourably on the grounds of their skin colour, race, nationality, ethnic or national origin, gender, religious faith, disability, sexual orientation or socio-economic group.
- 5.6 All those persons volunteering or otherwise working on behalf of the Order are, however, expected to respect the beliefs and practice of the Roman Catholic faith and the traditions of the Order.

6 SCOPE OF THIS POLICY

6.5 The policies and procedures contained herein apply to all Order activities, regardless of location, and are therefore applicable to Order activities taking place in the UK and overseas.

6.6 For the avoidance of doubt these policies and procedures apply to members, trustees, volunteers, contractors and staff who may not necessarily be involved in service delivery directly.

7. STATEMENT OF INTENT

7.1 The Order is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults. It expects all persons volunteering or otherwise working on its behalf to share this commitment.

7.2 The Order has and accepts a duty of care to maintain the safety of all children, young people and vulnerable adults within the organisation and with whom any persons volunteering or otherwise working on its behalf come into contact when engaged in any activity of the Order.

7.3 This policy should act as a guide for all persons volunteering or otherwise working on behalf of the Order including members of BASMOM, Companions, Grand Priory and members of the OMV.

7.4 The Order recognises the additional vulnerability of those children, young people or vulnerable adults for whom a pilgrimage or other trip with the Order may be their first journey away from home or family.

7.5 The Order will collectively manage risks and reduce the possibility of abuse of any kind by:

- having robust and safe procedures for the selection of members and volunteers and all those work on behalf of the Order;
- implementing safer working practices;
- providing induction and on-going training for all volunteers;
- providing up to date safeguarding policies and procedures that reflect current safeguarding legislation and guidance in respect of safeguarding children and vulnerable adults;
- keeping and reviewing records in order to develop and maintain best practice; and,
- developing and maintaining a culture of risk awareness and management.

7.6 In particular the Order will implement this policy by means of the

following specific measures:

- 7.6.1 Induction and Training; in particular for the Order's Lourdes/Lebanese pilgrimages every first-time volunteer must attend an induction day which includes a section that is specifically tailored to first-time helpers. It must also include an accredited first aid course. An alternative for helpers unable to attend this "in house" course is an independent accredited first aid course. Volunteers will be asked to renew their training at least every three years.
- 7.6.2 Safeguarding; a safeguarding briefing will as a minimum be provided in respect of every activity where provision of personal care is involved (as on our pilgrimages). On such activities all volunteers will be required to have a safeguarding certificate at level 1, obtained either online and/or as part of the induction training. As a minimum this training will take volunteers through the Order's Health and Safety Policy guidelines. Each volunteer will be required to sign a form confirming that they fully understand and accept the guidelines and that they intend to abide by them.
- 7.6.3 DBS Disclosures and Barring Service; it is recognised that as of October 2009, when the criteria for Enhanced CRB Disclosures changed to be defined by "Regulated Activity" under the Safeguarding Vulnerable Groups Act 2006 (SVGA), there ceased to be "positions of trust," which were replaced by "specified positions of responsibility". These are particular roles and posts recognised in detail within the Appendices of the SVGA and consequently require disclosure. The CRB (Criminal Records Bureau) and ISA (Independent Safeguarding Authority) merged into the DBS from 28th February 2013. The Order requires all persons working as volunteers under its control to *undergo* the DBS vetting process, save for occasional volunteers on any activity of limited duration such as a soup run for the homeless or tea party for the elderly or similar which will be led in any event by DBS vetted personnel, including a nominated safeguarding officer as below in line with current DBS requirements.
- 7.6.4 Safeguarding Officers; each constituent part of the Order including but not limited to BASMOM, the Companions, Grand Priory and the OMV will have its own appointed safeguarding officer (SO). In addition, in the absence of the SO there will be a person nominated as the safeguarding activity lead (SAL) for the protection of children, young persons and vulnerable adults on each Order activity where such persons are present. The SO's contact details or SAL's contact details as the case may be will be given at the time to all participants.

8. DEFINITIONS

8.4 Safeguarding is about embedding practices throughout the Order to ensure the protection of children, young persons and vulnerable adults wherever possible all as further detailed and defined below.

8.5 In relation to children and young persons safeguarding means (i) ensuring they are safe and free from neglect maltreatment or abuse of any kind and (ii) preventing impairment of their health, wellbeing or development.

8.6 In relation to vulnerable adults safeguarding means (i) preventing abuse or neglect wherever possible (ii) preventing harm and reducing the risk of abuse or neglect to adults who have care and support needs (iii) promoting an approach that concentrates on improving life for the adults concerned (iv) addressing what has caused the neglect and (v) providing information and support in readily accessible ways to help adults at risk to make safe choices and stay safe.

8.7 Abuse almost always involves exploitation and manipulation by those in a position of authority; and it can be caused by those inflicting harm or those who fail to prevent harm from occurring. Abuse is not restricted to any socio-economic group, gender or culture. It can take a number of forms, including but not limited to the following:

8.7.1 **Physical abuse:** physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness to a child/ or adult at risk.

8.7.2 **Sexual abuse:** sexual abuse involves forcing a child or adult to take part in sexual activities, not necessarily involving violence, whether or not that person or child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse may also involve non-contact activities, for example involving children or adults at risk in the production of, or watching of sexual images, watching sexual activities or encouraging children to behave sexually (grooming) in preparation for abuse (including via the internet). These acts can be committed by both males and females as well as by other children or adults at risk.

8.7.3 **Emotional abuse:** emotional abuse is the persistent emotional maltreatment of children, young persons or adults at risk so as to cause severe and persistent adverse effects on their emotional development and well being. It may involve

conveying that they are worthless, unloved, inadequate or only valued in so far as they meet the needs of another person. It may include not giving the child, young person or adult at risk the opportunity to express their views, deliberately silencing them or making fun of what they say or how they communicate. It may involve seeing or hearing the ill treatment of another and doing nothing about it. It may involve serious bullying (including cyber bullying) causing children, young persons or adults at risk frequently to feel frightened or in danger, exploited or open to corruption. It may feature age or developmentally inappropriate expectations being imposed, as well as over- protection and limitation of exploration and learning or preventing the participation in normal social interaction.

8.7.4 **Neglect:** neglect is the persistent failure to meet a child or adult at risk's basic physical and/or psychological needs in a way that is likely to result in a serious impairment of their health or development.

8.7.5 **Domestic abuse:** domestic abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or conduct by someone who is or has been an intimate partner or family member regardless of gender or sexuality. It includes: psychological, physical, sexual, financial or emotional abuse; so called 'honour' based violence; Female Genital Mutilation; and forced marriage.

8.7.6 **Discriminatory abuse:** discriminatory abuse comprises harassment, insults or similar actions related to race, religion, gender, gender identity, age, disability, or sexual orientation.

8.7.7 **Financial (or material) abuse:** financial abuse ranges from failure to access benefits through inadvertent mismanagement and opportunistic exploitation of a person at risk to deliberate and targeted abuse for personal gain, often accompanied by threats or intimidation. It can take a number of forms including theft, misappropriation of money or property, or misuse of assets.

8.5 **Definition of a Child:** a child is any person under the age of 18 (as defined in the UN Convention on the Rights of a Child). A young person is also a child.

8.6 **Definition of a Vulnerable Adult:** a vulnerable adult (or adult at risk of harm or adult at risk) is a person who is 18 or more years old, and who: has a dependency on others, or a requirement for assistance from others, in the performance of basic physical functions or who is in need of community care services by reason of mental or other disability, age or illness; or who has a severe impairment in their ability to communicate with others or has an impairment in their ability to protect themselves from assault, abuse, neglect, harm or exploitation. This may include a person who is elderly and frail, is a substance abuser, is homeless or is

isolated with minimal interaction with friends and family. Further details may be found in the Safeguarding Vulnerable Groups Act 2006.

9. ROLES AND RESPONSIBILITIES

9.4 All Order members, volunteers, trustees or staff working on behalf of the Order have a responsibility to follow the guidance laid out in this policy and related policies, and to pass on any safeguarding concerns using the required procedures. The Order expects all its members, volunteers, trustees and staff to establish good practice by being excellent role models, contributing to discussions about safeguarding and positively involving people in developing safe practices, as appropriate.

9.5 In addition certain persons in the Order have specific additional safeguarding responsibilities:

9.5.1 The **BASMOM Trustees** have a responsibility to ensure that:

- a safeguarding policy is in place and is appropriate;
- sufficient overall resources (time, money and personnel) are in place to deliver an effective safeguarding policy;
- a robust monitoring and safeguarding practice audit is in place; and
- the policies are regularly reviewed and updated.

9.5.2 The **Hospitaller** has a responsibility to ensure that:

- sufficient resources (time, money and personnel) are allocated to deliver an effective safeguarding policy;
- The appointed BASMOM Safeguarding Officer has the requisite skills and competencies and is appropriately recruited, trained, supervised and supported;
- all safeguarding concerns are properly dealt with in the absence of the safeguarding lead;
- he/she is an effective interface between the BASMOM Trustees and the safeguarding team within BASMOM; and
- any 'internal' [i.e. within the BASMOM group] disputes regarding safeguarding matters are resolved through the dispute resolution procedures that have been agreed for the organisation as a whole;

9.5.3 The **BASMOM Safeguarding Officer** has a responsibility to:

- ensure that the safeguarding and related policies are properly disseminated and implemented, kept up to date throughout the Order and developed from sound practice and experience;
- ensure that safeguarding officers in the constituent parts of BASMOM and all nominated safeguarding activity leads, volunteers and helpers are properly recruited and vetted and have access to appropriate induction and ongoing training;
- ensure that the welfare of children, young person and vulnerable adults who come into contact with the Order is

- promoted;
- ensure that an appropriate safeguarding risk assessment is completed for each BASMOM activity involving children, young persons or vulnerable adults;
- respond appropriately and swiftly to any concerns about safeguarding received, notifying all those who need to know whilst ensuring proper compliance with data protection and confidentiality policies;
- keep up to date with local and national arrangements for safeguarding including guidance from the Westminster Diocesan Safeguarding Commission, local authority safeguarding officers and the Disclosure and Barring Service;
- develop and maintain effective links with all the above agencies and where necessary participate in initial case conferences and strategy meetings; and
- respond to requests by the BASMOM Trustees for monitoring and audit information.

9.2.4 The **Order's Safeguarding Officers** (other than the BASMOM SO) have a responsibility to:

- Work with the BASMOM safeguarding officer to raise awareness of, and deliver effective safeguarding, throughout their part of the Order in accordance with this Safeguarding Policy and its procedures;
- respond appropriately and swiftly to any concerns about safeguarding received, notifying all those who need to know while ensuring proper compliance with data protection and confidentiality policies;
- commit themselves to undertake regular safeguarding training.

9.1.5 The responsibilities of any nominated **Safeguarding Activity Lead** (see clause 7.6.4 above) for the duration of their nomination on the relevant activity are to:

- ensure they have a copy of this Safeguarding Policy and that they are aware of its contents, meaning and effect;
- respond appropriately and swiftly to any concerns about safeguarding received, notifying all those who need to know while ensuring proper compliance with data protection and confidentiality policies;

10 **RECOGNITION OF HARM**

10.1 It is vital (and obligatory) that all members of the Order and volunteers and those working with the Order read this policy and are briefed on (or attend the induction and training that is intended to provide an increased knowledge of) the categories of abuse and the signs to look for to recognise abuse.

10.2 On pilgrimages the members of the Medical Team (in addition to those specified above) are always available to listen to any concerns raised and are able to take all suitable action in response.

11 **SAFEGUARDING POLICY IMPLEMENTATION**

11.1 The scope of this Safeguarding Policy is broad-ranging and in practice will be implemented via a range of policies and procedures within the Order. These include:

11.1.1 Safer recruitment: the Order ensures safe recruitment by ensuring that all Order members, volunteers, trustees or staff working on behalf of the Order provide appropriate references. All members, volunteers, trustees, staff, and others working with the Order are subject to appropriate vetting via the Disclosure and Barring Service checks.

11.1.2 Establishing a culture in the Order of reporting without delay any abuse or suspicions or concerns about abuse or the risk of abuse by encouraging reporting ('If you suspect it, report it' in the words of the Metropolitan Police) and whistleblowing; by providing the means of reporting; and by responding appropriately with clear procedures in the event of a report (see below).

11.1.3 Responding appropriately to allegations of abuse or concerns about abuse, by amongst other measures ensuring that:

- whistleblowers are protected and supported so that Order members, staff and volunteers and any working with us can report on others or practices within the Order should they have any concerns;
- anyone making (or affected by) a report should be made aware that confidentiality is limited and that there may be a requirement or duty to disclose certain information given that confidentiality may conflict with the need to ensure the safety and welfare of any child, young person or vulnerable adult to which a report relates;
- all records of a personal nature and sensitive information are properly stored and accessed appropriately and in accordance with this policy and its procedures (see below) and any relevant data protection policy; and
- grievance procedures are in place to address any breaches in acceptable conduct or policy implementation.

12 COMMUNICATIONS AND SUPPORT

12.1 The Order is committed to making its safeguarding policy and procedures accessible to all within its own organization and externally via its various websites. In the same way, the Order's complaints procedures will be readily accessible via its website/s to those who wish to make a complaint about any aspect of the Order's activities.

12.2 All Order members, staff, volunteers and any other persons working on our behalf who through their roles are in contact with children, young people or vulnerable adults will have access to training at an appropriate level.

12.3 Safeguarding knowledge and issues will be communicated throughout the Order by a variety of means including:

- reports to the Board of Trustees;
- regular meetings between the BASMOM Safeguarding Officer, the Hospitaller and the safeguarding officers of the various parts of the Order;
- routine safeguarding debriefings after each Order activity; and
- written incident reports and the sharing of lessons learned in order to establish and promote best practice within the Order.

13 PROCEDURES IN THE EVENT OF A REPORT OF ABUSE

13.1 It is important for their protection that children, young persons and vulnerable adults have clear and direct means for reporting abuse issues. All such reports of abuse whether comprising an allegation of abuse or a complaint or concern regarding abuse or of a risk of abuse (hereinafter a 'report of abuse') will be taken seriously and dealt with appropriately.

13.2 The policy and the procedures set out herein must be followed whenever any report of abuse is made.

13.3 Any Order member, staff, volunteer or any other person working with us who receives a report of abuse should respond to that report as set out below (under Responding to a Report of Abuse) which includes informing their SAL or SO immediately of any report of abuse. If the SAL receives the report they must escalate the report to their SO immediately.

13.4 A full record of the report of abuse must be made and retained by the relevant SO as soon as possible, including details of the allegation, complaint or concern and all relevant information about

the reported abuse. The report will be stored safely and access thereto limited appropriately.

13.5 This record should include the date of the report and the name and age of the person making the report. In so far as it is known, the record should include: the date, time and place where the reported abuse happened (or risk of abuse arose): the name and age of the child, young person or vulnerable adult affected: the nature of the alleged abuse: a description of any injuries observed: the names of any persons present or witnesses to the reported abuse: and a full version of events relating to the reported abuse.

13.6 Any report of abuse must be escalated to the BASMOM Safeguarding Officer via the relevant Safeguarding Officer and/or Safeguarding Activity Lead who has received the report on the same working day wherever possible. The Hospitaller, Chair of the Companions, Chancellor of the Grand Priory or Chairman of the OMV, as the case may be, should also be informed (in compliant form) of the report of abuse as soon as practicable.

13.7 The relevant SO should investigate each report of abuse in accordance with the procedures below and the Order shall take all appropriate action.

14 RESPONDING TO A REPORT OF ABUSE

14.1 Upon receiving a report of abuse, any Order member, member of staff, volunteer or other person working with us should follow these steps (Source: Diocese of Westminster Safeguarding Service 2013):

1. Assure the person making the complaint that they will be taken seriously.
2. Listen to what is being said.
3. Stay calm.
4. Do not probe for detail.
5. Empathise but do not jump to conclusions.
6. Do not disturb anything that may be evidence.
7. Do not promise complete confidentiality but explain that they have a duty to report the concern to somebody.
8. Do not attempt to question the alleged abuser.
9. Ensure that the person affected is in a safe environment.
10. Inform their Safeguarding Activity Lead or Safeguarding Officer, whichever is more convenient, immediately (and in any event within four hours).
11. Tell all the facts that they have been told or observed. Try not to give their own interpretation.
12. Record accurately details of the report. Include the date and the time of the incident, the people involved and details of any observed injuries, as well as the appearance and behaviour of the victim and what they have said.

13. be prepared to co-operate, as requested, in any reasonable way with the subsequent safeguarding enquiry.
- 14.2 If an individual's concern involves any Order member, member of staff, volunteer or other person working with the Order, they have a duty to report their concern.
- 14.3 If an individual thinks that someone is being abused or that poor standards of care are making for conditions in which there is a risk of abuse, they have a duty to report this. They should write down what they have witnessed, including dates, times, places and people involved, and make a report to their Safeguarding Officer as soon as possible.

15

INVESTIGATION AND FURTHER ACTION

- 15.1 A report of abuse will be investigated by the relevant Safeguarding Officer working together with the Hospitaller, Chair of the Companions, Chancellor of the Grand Priory or Chair of the OMV Trustees, as appropriate.
- 15.2 Any child, young person or vulnerable adult who is the subject of or who is affected by a report of abuse will be removed to and kept in a place of safety.
- 15.3 The alleged abuser or any person implicated by a report of abuse will be removed from the relevant place or activity and suspended from the activity and all related duties with the Order until the report has been investigated and resolved.
- 15.4 All appropriate external authorities must be informed upon disclosure – e.g. Social Services, the Police, etc.
- 15.5 A report of abuse will be resolved by an investigation, a reasoned determination of the allegations made and a decision making any appropriate recommendation/s and/or imposing any appropriate sanction/s.
- 15.6 If the report of abuse is of a serious or significant nature and has been referred to Social Services or the Police, the investigation, determination and sanction will be delegated to the appropriate authority. In such cases the Westminster Diocesan Safeguarding Office shall also be notified.
- 15.7 The Order will implement all and any recommendations, sanctions and further action required by the SO, Hospitaller, Chair of the CoM, Chancellor of the Grand Priory or Chairman of the OMV or appropriate external authority.

16.1 The Order is committed to monitoring the following aspects of its safeguarding arrangements, including:

- safe recruitment practices
- DBS checks and barring disclosures undertaken
- personal references followed up on new appointments
- records of all supervision sessions
- training register or records kept of all training undertaken
- monitoring of how safeguarding concerns are being reported and actioned
- checks that policies are up to date and relevant
- reviewing the current reporting procedure in place
- the overall effectiveness of the safeguarding team and its work.

17 MANAGING INFORMATION

17.1 Information will be gathered, recorded and stored in accordance with the Order's Data Protection Policy.

17.2 All Order members, members of staff, volunteers and persons working with the Order will be made aware that they have a duty in certain circumstances to share information with other individuals (and/or agencies) in order to safeguard children, young persons and vulnerable adults.

17.3 The public interest in safeguarding vulnerable groups may override confidentiality interests. Information will only be shared, however, on a need-to-know basis, as judged by the Order's Safeguarding Officers.

18 POLICY REVIEW

18.1 BASMOM undertakes to review this safeguarding policy and related policies and procedures annually and to update them on the basis of developing best practice, learning and experience, and changes in relevant government legislation and guidance.

18.2 **How does the Order keep your information safe?** They take appropriate measures to ensure that the information that affiliates give them is kept secure and they will do our best to protect it from unauthorised access.

18.3 Affiliates can ask for a copy of the information the Order holds about them at any time. They will also correct any inaccuracies in their information at their request.

18.4 The above summary of our data protection policy should be read

subject to the applicable Data Protection Policy and in case of any conflict the latter should have precedence.

19. **OTHER POLICIES**

19.1 This policy should be read together with the following specific policies:

- Confidentiality Policy
- Conflicts of Interest and Integrity Policy
- Data Protection Policy
- Expenses Policy
- Money Laundering Policy
- Speak-Up Policy

POLICY COMMITMENT

WE THE UNDERSIGNED commit to and adopt this this policy and the procedures herein on behalf of all those whom we represent and who volunteer or otherwise work under our control.

Signed:

Signed:

Signed:

The President
of BASMOM

The Chair of
The Companions

The Chair of
The OMV

Signed:

The Grand Prior of the Grand Priory

Date:

This Policy will be reviewed in March 2019