



**UNIFIED SAFEGUARDING POLICY AND PROCEDURES**

OF

**BASMOM (including the COMPANIONS OF THE ORDER OF MALTA)**

Registered Charity No: 1103567 OSCR: Office of the Scottish Charity Register No: SC040124  
Craigmyle House, 13 Deodar Road, London, SW15 2NP  
Telephone: (0044) (0) 20 7286 1414 Fax: (0044) (0) 20 7289 3243

-AND-

**ORDER OF MALTA VOLUNTEERS**

Registered Charity No: 1164242  
Craigmyle House, 13 Deodar Road, London, SW15 2NP  
Telephone: (0044) (0) 20 7286 1414 Fax: (0044) (0) 20 7289 3243

-AND-

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

Registered Charity no. 1166645  
67 Castletown Road, London W14 9HG Telephone: (0044) (0) 207 380 8247

## **1. INTRODUCTION**

1.1 This Unified Safeguarding Policy is applicable to, and governs the activities and conduct of, each of the following organisations (referred to hereinafter separately and collectively as the Order), and of all persons when they 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, and its committees. BASMOM is responsible for the hospitaller activities 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 hospitaller work of BASMOM through the voluntary work of Companions and those who volunteer to work with it. 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 (the Grand Priory), a registered charity under no.1166645, which has as its objects the advancement of the Roman Catholic Religion, of any hospitaller works of the Order, and the relief of poverty.

1.2 All the organisations named above work closely together and share the same Roman Catholic beliefs and mission to practise their 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. Its various 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 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 Order seeks to familiarise itself and keeps itself up-to-date with relevant legislation. Its procedures are designed to ensure that any act or omission which is found to breach its Safeguarding

Policy (as set out herein) is properly and expeditiously investigated and dealt with. The Order will consider whether each and any such act or omission is such that it is required to be reported to the relevant statutory authorities; if it is considered to be required to be reported, the Order will report it in timely fashion and in compliance with relevant legislation. The Order will where necessary co-operate with all relevant statutory authorities and agencies to help ensure that any such instances are properly and expeditiously investigated and dealt with.

### **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, employees or contractors 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 seek to achieve these aims in particular by the following measures:

3.5.1 The careful selection of suitable members, trustees, volunteers, employees and contractors and any other persons who work on behalf of the Order.

3.5.2 Raising awareness of safeguarding amongst members, trustees, volunteers, employees and contractors and any other persons who work on behalf of the Order.

3.5.3 Providing information which enables members, trustees, volunteers, employees and contractors and any other persons who 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 a member, trustee, volunteer, employee or contractor or any other person who works 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 members, trustees, volunteers, employees and contractors and any other persons who work on behalf of the Order with appropriate guidance, to reduce risks by providing safe practice guidelines.

#### **4. COMPLIANCE WITH SAFEGUARDING LEGISLATION AND BEST PRACTICE**

4.1 The policies and procedures herein have been developed to comply with applicable UK legislation and with best practice as contained in Westminster Archdiocese's safeguarding protocols and the "best practice" "Guidance for arranging pilgrimages involving children, young people and adults at risk" issued jointly by the Catholic Safeguarding Advisory Service and the National Catholic Safeguarding Commission, and are intended to be fully consistent therewith. The Order considers that the protocols and guidance referred to above are also consistent with the Safeguarding Standards set out in the "In God's Image" policy document published by the Bishops' Conference of Scotland.

4.2 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**

5.1 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.

5.2 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 DOCUMENT**

6.1 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.

6.2 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 document 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 who work on behalf of the Order;
- implementing safe working practices;
- providing induction and on-going training for all volunteers and staff;
- providing up to date safeguarding policies and procedures that reflect current safeguarding legislation and guidance in respect of safeguarding children, young people 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 required 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). As a minimum this training will take volunteers through the contents of this document. Each volunteer will be required to sign a form confirming that they fully understand and accept the contents of this document and that they intend to abide by it.

7.6.3 **DBS Disclosure and Barring Service ("DBS") and Protecting Vulnerable Groups ("PVG")** - the DBS is a government body which facilitates records checks by police, etc, for organisations such as the Order to ascertain whether an applicant may be unsuitable to work with children, young people or vulnerable adults: PVG is the scheme run by Disclosure Scotland, an executive agency of the Scottish government, which has aims and processes similar to those of the DBS. The Order has appointed a DBS co-ordinator to process and monitor applications and status, and who reports to and is under the supervision of the Hospitaller, who is responsible for ensuring that the Order's policy in this area is operated in line with the law. In summary, in line with current DBS requirements, the Order requires all UK-resident staff and persons working, or applying to work, as volunteers under its control to undergo the DBS vetting process, at the "Enhanced" level where their activities would include "Regulated" activities in terms of the DBS legislation, 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. Non-UK residents are required by us to undergo similar police checks in their jurisdiction of residence. In relation to activities of the Order in Scotland, Scottish residents would be required to undergo similar vetting in accordance with the PVG scheme.

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 the SAL's contact details as the case may be, will be given at the time to all participants.

## **8. DEFINITIONS**

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

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

8.3 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 abuse or neglect and (v) providing information and support in readily accessible ways to help adults at risk to make safe choices and stay safe.

8.4 Abuse almost always involves exploitation and manipulation by someone 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:

8.4.1 **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.

8.4.2 **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.

8.4.3 **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 wellbeing. 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 participation in normal social interaction.

8.4.4 **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.

8.4.5 **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.

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

8.4.7 **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**

9.1 **ALL** members, volunteers, trustees, employees or contractors working on behalf of the Order have the following responsibilities:

- to follow the guidance laid out in this policy and related policies; and
- to pass on any safeguarding concerns using the required procedures,

and the Order expects all its members, volunteers, trustees, employees or contractors to establish good practice by being excellent role models, contributing to discussions about safeguarding and positively involving people in developing safe practices, as appropriate.

9.2 In addition, certain persons in the Order have specific additional safeguarding responsibilities as a result of agreement that BASMOM will take the lead in relation to safeguarding in Great Britain:

9.2.1 The **BASMOM Trustees** have responsibilities to ensure that:

- a unified safeguarding policy for the entire Order 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.

9.2.2 The **Hospitaller** has responsibilities 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;
- he/she is an effective interface between the BASMOM Trustees and the safeguarding team within BASMOM and, as necessary or appropriate, with the Trustees of the OMV and of the Grand Priory; and
- any disputes within the Order regarding safeguarding matters are resolved through the dispute resolution procedures that have been agreed for the organisation as a whole.

9.2.3 **The BASMOM Safeguarding Officer** has responsibilities 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 respond to any concerns about safeguarding received, notifying all those who need to know while ensuring proper compliance with data protection and confidentiality policies;
- keep up to date with local and national (including where relevant Scottish) arrangements for safeguarding including, insofar as is consistent with national guidance, guidance from the Westminster Diocesan Safeguarding Commission, local authority safeguarding officers and the Disclosure and Barring Service (and Protecting Vulnerable Groups);
- 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 and, as necessary or appropriate, the Trustees of the OMV and of the Grand Priory for monitoring and audit information.

9.2.4 The **Order's Safeguarding Officers (other than the BASMOM SO)** have responsibilities 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;

- ensure that an appropriate safeguarding risk assessment is completed for each activity in their part of the Order involving children, young persons or vulnerable adults;
- 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; and
- commit to undertake regular safeguarding training.

9.2.5 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 document and that they are aware of its contents, meaning and effect; and
- to 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.

9.2.6 The **Safeguarding Scrutineer** reports to the BASMOM Trustees and has a responsibility to ensure that the BASMOM Trustees, the Hospitaller and the BASMOM Safeguarding Officer undertake their responsibilities at clauses 9.2.1 to 9.2.3 above.

## **10. SAFEGUARDING POLICY IMPLEMENTATION**

10.1 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:

10.1.1 Safe recruitment: the Order ensures safe recruitment by ensuring that all Order members, trustees, volunteers, employees and contractors and any other persons who work on behalf of the Order provide appropriate references. Members, trustees, volunteers, employees and contractors who work on behalf of the Order are subject to appropriate vetting via the Disclosure and Barring Service checks.

10.1.2 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).

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

- whistleblowers are protected and supported so that Order members, staff and volunteers and anyone 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.

## **11. COMMUNICATIONS AND SUPPORT**

11.1 The Order is committed to making its safeguarding policy and procedures accessible to all within its own organisation 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.

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

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

- regular reports by the Hospitaller to the BASMOM Trustees and, as appropriate or necessary, to the Trustees of the OMV and of the Grand Priory;
- regular meetings between the BASMOM Safeguarding Officer, the Hospitaller, the Safeguarding Scrutineer 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.

## **12. PROCEDURE IN THE EVENT OF A REPORT OF ABUSE**

12.1 It is important to the Order that, for their protection, children, young persons and vulnerable adults have and are aware of 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.

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

12.3 Any members, trustees, volunteers, employees and contractors and any other persons who work on behalf of the Order who receives a report of abuse should

- respond to that report as set out in the Appendix to this document (under **Responding to a Report of Abuse**); and
- inform their SAL or SO immediately of the report of abuse.

12.4 If the SAL receives the report, which for the benefit of doubt and in the interests of alacrity may be in oral form in the first instance, they must escalate the report to their SO immediately.

12.5 A full written 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.

12.6 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.

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

12.8 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 a place of safety.

12.9 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.

12.10 Any report of abuse (in relation to any arm of the Order) 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 and, as the case may be, the Chair of the Companions, or the Chancellor of the Grand Priory, or the OMV Chairman and the Chair of the OMV Trustees of the OMV, must also be informed of the report of abuse as soon as practicable.

### **13. FURTHER REVIEW AND ACTIONS**

13.1 A report of abuse will be reviewed by the relevant Safeguarding Officer working together with the Hospitaller and the BASMOM Safeguarding Officer; and with the Chair of the Companions, or the Chancellor of the Grand Priory, or the OMV Chair and Chair of the OMV Trustees, as appropriate.

13.2 If the report of abuse is considered upon disclosure to the Hospitaller and the BASMOM Safeguarding Officer and the relevant SO to be of a serious or significant nature such that it must be reported to appropriate external authorities (for example Social Services or the Police), the Hospitaller or the relevant SO must inform all the appropriate external authorities at the earliest opportunity. In such cases the Westminster Diocesan Safeguarding Office shall also be notified. In cases involving Scotland, the Archdiocesan Safeguarding Advisor for the Archdiocese of St Andrews and Edinburgh should be notified, rather than the Safeguarding Office of the Diocese of Westminster.

13.3 If the report of abuse is of a serious or significant nature and has been referred to the appropriate external authorities, any investigation, determination and sanction will be delegated to the appropriate authority, and the Order will provide appropriate support.

13.4 If it is not considered that the report of abuse should be referred to the external authorities, the review of the facts by the persons mentioned in clause 13.1 above will be resolved by a reasoned determination of the allegations made and a decision making any appropriate recommendation/s and/or imposing any appropriate sanction(s).

13.5 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 OMV Chair and Chair of the OMV Trustees, or by any appropriate external authority.

## **14. MONITORING**

14.1 The Order is committed to monitoring its safeguarding arrangements, including:

- safe recruitment practices;
- DBS (and PVG and, for residents of overseas jurisdictions, similar) 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;
- checking 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.

## **15. MANAGING INFORMATION**

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

15.2 All Order members, trustees, volunteers, employees and contractors 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.

15.3 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.

**16. POLICY REVIEW**

16.1 BASMOM undertakes to review this document 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.

**POLICY COMMITMENT**

**WE THE UNDERSIGNED** commit to and adopt 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

Date:

Date:

Date:

Signed

Signed:

Chair of the OMV Trustees

The Procurator of the Grand Priory

Date:

Date:

This Policy will be reviewed in October 2021.

**Approved by all signatories 1 October 2020**

## **APPENDIX**

### **RESPONDING TO A REPORT OF ABUSE (clause 12.3 above)**

Upon receiving a report of abuse, any Order member, member of staff, volunteer or other person working with us should follow these steps:

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 you 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 your Safeguarding Activity Lead or Safeguarding Officer, whichever is more convenient, immediately (and in any event within four hours).
11. Tell all the facts that you have been told or observed. Try not to give your 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. If an individual's concern involves any Order member, member of staff, volunteer or other person working with the Order, the concerned individual has a duty to report their concern.
15. 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. They should write down what they have witnessed, including dates, times, places and people involved, and make a report to their Safeguarding Activity Lead or Safeguarding Officer as soon as possible.

*(Source: Diocese of Westminster Safeguarding Service 2013)*