

Order of Malta in Great Britain

Safeguarding Children, Young People and Adults at Risk Policy

1. Context and extent

- 1.1 This policy, hereinafter referred to as the Unified Safeguarding Policy is applicable to, and governs the activities and conduct of, each of the following organisations of the Sovereign Military Hospitaller of Order of St John of Jerusalem, of Rhodes and of Malta (**the Order**) in Great Britain (**GB**) and of all persons when they volunteer or otherwise work on their behalf:
- 1.1.1 The Association of British Members of the Sovereign Military Hospitaller Order of St John of Jerusalem, of Rhodes and of Malta (**BASMOM**) a company limited by guarantee (number 05039938) and charity registered under the name BASMOM with the Charity Commission (number 1103567) and Office of the Scottish Charity Regulator (number 05039938). BASMOM is the territorial organisation of the Order responsible for organising hospitaller activities in England, Scotland & Wales, including through the Companions of the Order of Malta. Such activities include 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 Order of Malta Volunteers (**the OMV**), a company limited by guarantee (number 0980194) and charity registered with the Charity Commission under the name OMV (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.
- 1.1.3 The Grand Priory of England (**GPE**). The GPE is the territorial organisation of the Order responsible for religious activities in England, Scotland & Wales: it does so through The Grand Priory of Blessed Adrian Fortescue of the Order of Malta Trust.
- 1.1.4 The Grand Priory of Blessed Adrian Fortescue of the Order of Malta Trust (**the Grand Priory Trust**), a company limited by guarantee and charity registered with the Charity Commission (number 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.

(together **the Order Entities**, referred to collectively below as **the Order in GB**).

- 1.2 As part of the Order, the Order Entities work closely together in pursuit of its charism of *Tuitio Fidei et Obsequium Pauperum*: defending and nurturing the Faith and service of the poor and the sick.
- 1.3 This Unified Safeguarding Policy is limited to the Order Entities, whose territorial extent is England, Wales and Scotland, and their activities, which may take place outside England, Wales and Scotland.

2. Statements and Aims

2.1 Policy Statement

The Order in GB believes unreservedly in the personal dignity, fundamental freedoms and rights of all human beings. We recognise that the welfare of all children, young people and adults at risk, is paramount and that *all* have equal rights of protection. We have a duty of care when they are in our charge, and we will do everything we can to provide a safe and caring environment for those in our care and with whom we work. We will:

- treat everyone with respect and celebrate their achievements,
- carefully recruit and select all staff and volunteers,
- respond to concerns and allegations appropriately.

2.2 Policy Scope

The scope of this Unified Safeguarding Policy is broad-ranging and in practice will also be implemented via the policies and procedures referred to herein, all of which apply to:

- all Order in GB activities, regardless of location (and are therefore applicable to Order in GB activities taking place in the UK and overseas); and
- to members, trustees, volunteers, contractors and staff who may not necessarily be involved in service delivery directly.

2.3 Compliance with safeguarding legislation and best practice

- 2.3.1 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.
- 2.3.2 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.

2.4 Policy review and communication

- 2.4.1 The Order in GB's policy is approved by the boards of trustees of BASMOM, the OMV and the Grand Priory Trust and the Chapter of the GPE and will be reviewed and updated annually.
- 2.4.2 We will publish and promote this policy to all members, staff, and volunteers through induction, training and supervision. We will endeavour to disseminate, as appropriate, this policy to all who come into contact with the Order in GB e.g., children, young people, adults at risk, their parents, carers, families and others, such as organisational partners and fundraisers.

2.5 Equal Opportunities Statement

- 2.5.1 The Order in GB recognises that anyone can become subject to discrimination, harassment or victimisation because of:
- age
 - culture
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race (including colour, nationality and ethnic or national origins)
 - religion or belief
 - sex
 - sexual orientation
- 2.5.2 Comments and actions that contribute to discrimination, harassment or victimisation are not acceptable and will be challenged. Such incidents will be recorded and shared with parents and carers, and the relevant agencies when necessary and appropriate.

- 2.5.3 All those persons volunteering or otherwise working on behalf of the Order in GB are, however, expected to respect the beliefs and practice of the Roman Catholic faith and the traditions of the Order.

2.6 Policy Aim

- 2.6.1 The Order in GB aims at all times to attain best safeguarding practice throughout all its activities with children, young people, adults at risk, their parents, carers and/or families. The Order in GB endeavours to provide a safe and friendly environment for all children, young people and adults at risk with whom it comes into contact. It will achieve this by adhering strictly to this policy, the policies, protocols and procedures referred to herein, guidance and risk assessments. The Order Entities hold current Public Liability Insurance in respect of their activities.
- 2.6.2 The policy establishes a framework to support all persons who volunteer or otherwise work on behalf of the Order in GB in their practices and clarifies the Order in GB's expectations in respect of safeguarding in order to give confidence to volunteers and those working on behalf of the Order in GB, and to allow healthy and supportive relationships to flourish without fear.

3. Safeguarding Personnel

3.1 Identities of Leads and Deputies for Safeguarding

- The identities of the Leads and Deputies for Safeguarding are set out at Appendix 1.
- The Leads for Safeguarding for each Order entity are responsible for informing the Company Secretary of BASMOM within 24 hours of any change of safeguarding personnel.
- The Company Secretary of BASMOM is authorised to update Appendix 1 as and when he or she is notified of changes to safeguarding personnel and must, within 24 hours of amending Appendix 1, circulate a copy of the amended Appendix to the Trustees for Safeguarding and the Leads and Deputies for Safeguarding of the Order Entities.
- The Leads for Safeguarding are responsible for ensuring that the identities of the Leads and Deputies for Safeguarding of their respective Order Entity are published on the website and updated within two working days of any changes being made.

3.2 Additional Deputies for Safeguarding for Order activities

The Order in GB will ensure that for each discrete activity at which children, young persons or vulnerable adults are present, a nominated Activity Safeguarding Deputy (**ASD**) is appointed. The Lead for Safeguarding, the Deputy for Safeguarding and the ASD will be identified to all participants in any such activity, and their contact details will be given.

3.3 Responsibilities of Leads and Deputies for Safeguarding and ASDs

- 3.3.1 The role of the Leads for Safeguarding is to oversee and ensure that this Unified Safeguarding Policy is fully implemented. In particular, their responsibilities are to:
- monitor and record concerns;
 - make referrals to social care, or police, as relevant, without delay
 - liaise with other agencies;
 - ensure that an appropriate safeguarding risk assessment is completed for each activity involving children, young persons or adults at risk;
 - ensure that Deputies, ASDs, volunteers and helpers are properly recruited and vetted;
 - respond to requests by trustees of their respective organisations for monitoring and audit information; and
 - arrange induction and ongoing Safeguarding training for Deputies and ASDs and to approve the training to be provided by ASDs.

3.3.2 The Deputy for Safeguarding should be available to support or cover for the Lead when the Lead is not available. S/he will also handle any complaints or allegations against the Lead for Safeguarding if appropriate. The Lead and Deputy for Safeguarding must not be connected persons as defined by ss. 252-254 of the Companies Act 2006.

3.3.3 The responsibilities of the Activity Safeguarding Deputies, for the activity for which they have been nominated to the role, are to:

- monitor and record concerns;
- make referrals to social care, or police, as relevant, without delay
- liaise with other agencies;
- ensure that volunteers and helpers are properly recruited and vetted; and
- arrange induction and ongoing Safeguarding training for members engaging in Order activities and volunteers.

3.3.4 The Leads and Deputies for Safeguarding and ASDs must have up to date training on adult and child safeguarding, online safety, and any other relevant matters, with the commitment and ability to develop knowledge, skills and expertise in safeguarding.

3.4 **Line of accountability for safeguarding**

3.4.1 All trustees of the boards of trustees of BASMOM, the OMV and the Grand Priory Trust and the members of the Chapter of the GPE share the legal responsibility for safeguarding in their respective organisations, and should be mindful of reporting notifiable safeguarding incidents. The Order recognises however that the role of Trustee for Safeguarding demonstrates the legal commitment for managing safeguarding under the Children Act 2004 and is also best practice for a charity working with adults and therefore each organisation will designate a trustee as Trustee for Safeguarding.

3.4.2 The Trustees for Safeguarding are responsible, in their respective organisations, for:

- overseeing and scrutinising all strategic arrangements for safeguarding for their organisation;
- ensuring that sufficient overall resources (time, money and personnel) are in place to deliver effectively this Unified Safeguarding Policy;
- ensuring that a robust monitoring and safeguarding practice audit is in place;
- ensuring that the Leads for Safeguarding have the requisite skills and competencies and are appropriately recruited, trained, supervised and supported;
- being an effective interface between their respective boards of trustees and the Leads and Deputies for Safeguarding and as appropriate, with one another;
- following up any serious concerns such as staff allegations or complaints quickly and on the same day (other specific and operational concerns about issues of individual beneficiary welfare, should be managed by the Leads or Deputies for safeguarding); and
- reporting back, in general terms, to the trustees of their respective organisations, as a regular standing agenda item.

3.4.3 The Trustees for Safeguarding should:

- be known by, contactable and accessible to everyone;
- not be connected (as defined by ss. 252-254 of the Companies Act 2006) to the Leads or Deputies for Safeguarding in their respective organisations; and
- have up to date training on adult and child safeguarding, online safety, and any other relevant matters, with the ability to develop knowledge, skills and expertise in safeguarding.

3.4.4 The Trustees for Safeguarding are:

- For BASMOM: the Chancellor of BASMOM (currently: Anton' de Piro)
- For the OMV: the Trustee for Safeguarding (currently: Tabitha Brenninkmeijer)
- For the GPE and the Grand Priory Trust: the Pro Chancellor of the GPE (currently: Thomas de Burgh)

3.5 **Safeguarding Committee**

To facilitate a coordinated and consistent approach to Safeguarding among the Order Entities, to provide a forum to share knowledge and best practice and to support the work of the Trustees for Safeguarding a committee will

meet at least twice a year (and otherwise as needed) comprising the Hospitaller of BASMOM (as the Trustee of BASMOM responsible for the works of the Order in Great Britain) and the Leads and Deputies for Safeguarding of the Order Entities (the Safeguarding Committee).

The Safeguarding Committee will at least annually review the safeguarding training records maintained by the Trustees for Safeguarding of the Order Entities.

The Trustees for Safeguarding of the Order Entities will be invited to attend the Safeguarding Committee as observers.

The BASMOM Lead for Safeguarding will chair the Safeguarding Committee and will otherwise be responsible for coordination of the Leads and Deputies for Safeguarding.

4. Why does the Order in GB need a Safeguarding Policy?

- 4.1 All organisations that work or come into contact with children, young people and/or adults at risk need to have safeguarding policies and procedures in place. Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall into the remit of this policy.
- 4.2 The Order in GB is committed to safeguarding and promoting the welfare of children, young people and adults at risk. It expects all members of BASMOM (including the Companions of the Order of Malta), the GPE, the OMV and persons volunteering or otherwise working on its behalf to share this commitment and to always comply with the United Safeguarding Policy and the policies and procedures referred to herein.
- 4.3 The Order in GB recognises the additional vulnerability of those children, young people or adults at risk for whom a pilgrimage or other trip with the Order may be their first journey away from home or family.
- 4.4 To undertake these responsibilities, we:
- have trustees committed to safeguarding;
 - are clear about peoples' responsibilities and accountability;
 - have a culture of listening to children, young people and adults at risk;
 - undertake safer recruitment practices for all staff and volunteers working with children and young people and adults at risk;
 - have procedures for safeguarding children and young people and adults at risk;
 - have procedures for dealing with allegations against, and concerns about, any staff;
 - make sure staff, paid and unpaid, have mandatory induction and further safeguarding training, supervision, reviews and support; and
 - have agreements about working with other organisations and agencies.

5. Definitions

See Appendix 2.

6. Related Policies and Procedures

The scope of this Safeguarding Policy is broad-ranging and in practice will also be implemented via the following policies and procedures:

6.1 Data Protection

The Order Entities will treat any personal information by which an individual can be identified, for example, name, address, and email, in accordance with the provisions of Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR). Within the context of safeguarding, the Order in GB recognises the need to strike a careful balance between protected children and adults at risk, and respecting data

protection principles. The Order Entities' data protection policies seek to strike that balance. It recognises that timely and accurate written records play an essential role in safeguarding individuals, who may have suffered, are suffering or at significant risk of suffering harm and that it is important that records are shared at the appropriate time when necessary, as required or permitted by law. Within the Order in GB, the decision to share written information, and with whom, will be undertaken by the relevant Lead or the Deputy for Safeguarding

6.2 Confidentiality

This Unified Safeguarding Policy is in line with government guidance about confidentiality within the context of safeguarding and data protection.

The Order in GB fully endorses the principle of the welfare of children, young people and adults at risk, overriding any obligations of confidence it may hold to others. The Order in GB's policy on confidentiality makes it clear that no one working, or involved, with our organisation can promise absolute confidentiality. Individual cases will only be shared or discussed on a "need to know" basis.

6.3 Whistleblowing

Whistleblowing is when someone raises a concern externally about a person or practice within an organisation, which will affect others in an illegal and / or harmful way.

The Order in GB promotes the sharing of any concerns regarding the safeguarding of children, young people and adults at risk as soon as possible with the Leads or Deputies for Safeguarding, or if appropriate, the Trustees for Safeguarding. 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 in GB should they have any concerns.

If however, individuals reporting their concerns within the Order in GB do not feel those concerns have been acted upon then we support their right to report these concerns to the Local Authority Designated Office (LADO) (England and Wales only) social care services, the police, and the Charity Commission (whistleblowing@charitycommission.gov.uk). They can also contact the NSPCC dedicated helplines and the charity Protect for advice and support.

All media enquiries will be handled by Philippa Leslie, the Director for Communications.

6.4 Safer Recruitment

6.4.1 The Order in GB is committed to safe recruitment in line with the relevant legislation and guidance from government and the Charity Commission for recruiting all staff, paid or unpaid.

6.4.2 The Order requires certain GB-resident staff and persons working or applying to work as volunteers under its control to undergo the vetting processes administered by the Disclosure and Barring Service in England and Wales (DBS) and by Protecting Vulnerable Groups (PVG) in Scotland:

- DBS checks will be made at "Enhanced" level where volunteer activities include "Regulated" activities for the purposes of the relevant legislation: for all pilgrims where they will or may undertake care for adults at risk and/or children and for leaders of all other activities. Volunteers who are not leaders of such other activities (for example, soup kitchens or visiting residents of care homes) do not undertake "Regulated" activities and are not, therefore, required to have an "Enhanced" level DBS check.
- PVG checks will be made on a similar basis in respect of activities undertaken in Scotland.
- Non-UK residents who volunteer in the Order in GB's activities.

6.4.3 Such DBS, PVG and other checks will ordinarily be repeated as a minimum every three years.

6.5 Recruitment of ex-offenders

The Order in GB's policy on the recruitment of ex-offenders seeks to safeguard children and adults at risk whilst not discriminating unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

6.6 Dealing with Complaints, Disciplinary & Grievance Procedures

The policies and procedures set out in this Unified Safeguarding Policy are in line with the statutory guidance and CCEW and OCSR guidelines, and our policies concerning, our disciplinary, complaints and grievance procedures (and vice versa). These will be made available to everyone.

Where a complaint or allegation has been made with regards to any inappropriate behaviour or poor practice that raises a safeguarding concern, the Lead or Deputy for Safeguarding will, in all cases, discuss the situation with social care services (the LADO with regards to children England and Wales only) and / or the police before making an open decision about the best way forward.

In the case where the Lead is implicated, the Deputy should be informed. In the exceptional circumstances that both are involved, the person concerned will inform the Trustee for Safeguarding. If there is a belief that the concern has not been taken seriously then anyone can “Whistleblow”

With regards to disciplinary and grievance procedures, we will take no steps until we have fully discussed and agreed a strategy with social care services and / or the police, (the LADO, with regards to children England and Wales only). Any investigation will override the need to implement any such procedures. The boards of trustees are responsible for making referrals to the relevant:

- criminal records service
- Regulatory Authority
- professional body

6.7 Bullying and Harassment

The Order in GB has in place a policy against bullying and harassment, which recognises that bullying and harassment can also raise safeguarding issues.

6.8 Working Practices

6.8.1 Members, trustees, staff, volunteers and contractors are required to abide by guidelines covering the following matters:

- Consent
- Staff ratios to children and adults at risk
- Lone and one-to-one working
- Home visits
- Young people working in the Order
- Photography and filming
- Transport
- Activities, Events and Visiting Speakers/Activity Leaders
- First Aid
- Buildings and venues
- Child, Young Person or Adult goes Missing
- The Late Pick Up of a Child, Young Person or Adult at Risk

6.8.2 Members, trustees, staff, volunteers and contractors are required to abide (so far as applicable for each individual Order Entity) by:

- Code of conduct
- Online safety code of conduct
- Code of conduct for Board Meetings

7. Induction and Training

7.1 Volunteers

- 7.1.1 All first-time volunteers must receive appropriate training, including material tailored for first time volunteers, before they are permitted to deliver care to children or adults at risk. Volunteers will be required to renew their training at least every three years.
- 7.1.2 A safeguarding briefing will as a minimum be provided in respect of every activity at which children, young persons or adults at risk are intended to be present. Where provision of personal care to such persons is involved, volunteers will be required to undertake appropriate safeguarding training, which will include an explanation of the contents of this document. Each volunteer will be required to sign a form confirming that they fully understand and accept the Unified Safeguarding Policy and will abide by it, have been given any relevant resources and that they understand the commitment to safeguarding training.

7.2 Trustees

- 7.2.1 All Trustees must upon appointment complete courses on leading on child and adult safeguarding and safeguarding for trustees and must renew this training at least once every two years.
- 7.2.2 It is the responsibility of the Trustees for Safeguarding for each Order Entity to keep a record of the training that each of his or her fellow trustees has received, to organise update training, with the assistance of the Company Secretary of BASMOM, and to ensure that at least a once a year, the safeguarding training records are reviewed.

7.3 Leads and Deputies for Safeguarding and Activity Safeguarding Deputies

- 7.3.1 Leads and Deputies for Safeguarding and Activity Safeguarding Deputies must have completed courses on leading on child and adult safeguarding and renew this training at least once every two years.
- 7.3.2 The Trustees for Safeguarding for each Order Entity are responsible for keeping a record of the training that their respective Leads and Deputies for Safeguarding and ASDs have received, to organise update training, with the assistance if required of the Company Secretary of BASMOM and to ensure that at least a once a year, the safeguarding training records are reviewed.

8. Handling Safeguarding Concerns

- 8.1 Any member, trustee, volunteer, employee, contractor or any other person who works on behalf of the Order in GB who has a safeguarding concern because:

- he or she has seen something;
- someone says they have been abused;
- he or she has been told by somebody else that they are concerned;
- there has been an allegation against a colleague;
- there has been an anonymous allegation;
- an adult has disclosed that they were abused as a child; or
- a child, young person or adult say they are abusing someone else,

must follow the **Safeguarding Reporting Protocol and Procedure**.

- 8.2 When a safeguarding concern has arisen because of a disclosure made by a child, young person or adult at risk, the person to whom the disclosure has been made must:

- take what he or she is being told seriously;
- assure the person making the complaint that they will be taken seriously;
- listen to what is being said;
- stay calm and reassure;
- not probe for detail;

- empathise but do not jump to conclusions.
- not disturb anything that may be evidence.
- not promise complete confidentiality, but explain that he or she has a duty to report the concern to somebody;
- not attempt to question the alleged abuser or investigate in any way; and
- ensure that the person affected is in a safe environment.

- 8.3 In the case of joint activities, say between BASMOM and the OMV, if a report of abuse is made involving only a person or persons from either the OMV or BASMOM, the Lead for Safeguarding for the respective organisation shall be the Lead responsible (**the relevant Lead**). If the report of abuse involves abuse across both organisations, the Lead from each organisation shall be jointly involved. If the Lead who is informed in the first instance is not the relevant Lead, they must immediately inform the relevant Lead, who will be responsible for the full written record and for the further actions. If the allegation of abuse has been made against the Lead then the references in this paragraph should be to the Deputy for Safeguarding of the relevant entity or entities. If the allegation involves both the Lead and the Deputy for Safeguarding, the reference in this paragraph should be to the Trustee for Safeguarding for the relevant entity or entities.
- 8.4 If the safeguarding concern does not amount to an allegation of abuse (e.g., if it concerns poor practice such as a breach of the Order's one-to-one working practice), it is for the Lead to decide how to deal with the concern. Such concerns may for example be dealt with by speaking to the persons involved and offering advice, support and training or monitoring and recording.
- 8.5 If the safeguarding concern does constitute an allegation of abuse, regardless of whether the abuse occurred recently or in the past, or whether the accused person is living or deceased, then in line with the policy of the Diocese of Westminster, the Lead must report the allegation to the relevant statutory authority. The Lead should refer the concern to the relevant adult's or children's social care service and/or the Police and follow up the referral in writing within 24 hours. **For England and Wales**, in cases of allegations against a "person of trust" with a "duty of care" towards a child, the Local Authority Designated Officer (LADO) will co-ordinate the next procedural steps. If the allegation of abuse has been made against the Lead then the references in this paragraph should be to the Deputy for Safeguarding of the relevant entity or entities. If the allegation involves both the Lead and the Deputy for Safeguarding, the reference in this paragraph should be to the Trustee for Safeguarding for the relevant entity or entities.
- 8.6 Safeguarding incident reports, in which the identity of the victim has been redacted, will be reviewed by the Lead(s) for Safeguarding together with the Trustee(s) for Safeguarding of the relevant entity or entities for legitimate purposes such as for example "lessons learned", informing insurers or referring a member to the joint disciplinary committee. If the safeguarding concern constitutes an allegation of abuse, the Trustee for Safeguarding will notify the Westminster Diocesan Safeguarding Office. 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.
- 8.7 At all times when required, and especially where there is a safeguarding concern, the Order is committed to keeping records which adhere to the **Safeguarding Reporting Protocol and Procedure**:
- 8.8 If the allegation is of abuse currently occurring during an Order in GB activity, any child, young person or vulnerable adult who is the subject of or who is affected by the allegation will be removed to a place of safety.
- 8.9 The alleged abuser or any person implicated by a report of abuse (a respondent) will be:
- treated with respect, courtesy, and sensitivity;
 - informed that they are the subject of an allegation and provided with details of the allegation, subject to (if relevant) the agreement of any other agency which may be involved;
 - Kept updated on the progress of the case and given the opportunity to participate in any investigation and to make full representation; and
 - Informed of the possible outcomes of any investigation and the implications.

- 8.10 No assumption will be made as to the guilt of the respondent, but he or she will be removed from the relevant place or activity and suspended from the activity and all related duties with the Order in GB until the report has been investigated and resolved. If the respondent so wishes, the relevant Lead shall appoint an appropriate person, not involved in the accusation, to provide pastoral service to the alleged abuser and provide them with liaison assistance during the initial investigation process.

9. Online Safety

9.1 Why do we need to include Online Safety?

Modern digital technology has made access to information and communication increasingly easy for everyone. This is especially so for those who cannot always go out to socialise and rely on websites for social networking, watching films, downloading music, buying lottery tickets, shopping etc. Government guidance is clear, that all organisations working with children, young people adults at risk, families, parents and carers have responsibilities. It is also important to remember, children, young people and adults at risk can also abuse and such incidents fall into the remit of this policy.

9.2 Online Safety Code of Conduct

We expect everyone in our organisation to agree and sign up to our Online Safety Code of Conduct to be introduced within six months of the date of this policy.

10. Monitoring

The Order in GB is committed to monitoring the efficacy of its safeguarding arrangements by introduction of a **Safeguarding Monitoring Protocol and Procedure** within six months of the date of this policy.

11. Policy Date

This policy is effective from 10 July 2026.

12. Policy Review

This document and related policies and procedures will be reviewed annually or when there are substantive organisational changes and updated on the basis of developing best practice, learning and experience, and changes in relevant government legislation and guidance.

Policy Review Date: 10 January 2027

13. Policy approval and commitment

- 13.1 This policy was approved as follows:

<i>Approving body</i>	<i>Date</i>
Council of BASMOM	9 July 2026
Trustee Board of OMV	9 July 2026
Chapter of the GPE	8 July 2026
Trustee Board of the Grand Priory Trust	8 July 2026

- 13.2 BASMOM, the OMV, the GPE and the Grand Priory Trust 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.

Appendix 1 – Safeguarding Personnel

BASMOM Lead and Deputy for Safeguarding

BASMOM's Lead for Safeguarding is: James Pavey

BASMOM's Deputy for Safeguarding is: Niall Keenan

BASMOM's Activity Safeguarding Deputy - Lourdes Pilgrimage is: [to be appointed before May 2027 Pilgrimage]

BASMOM's Activity Safeguarding Deputy - Walsingham Pilgrimage is: Esther Ibbs

BASMOM's Activity Safeguarding Deputy – Companions of the Order of Malta is: Jonathan Rawlings

The OMV's Lead and Deputy for Safeguarding

The OMV's Lead for Safeguarding is: Mark Haden

The OMV's Deputy for Safeguarding is: Cecilia Vorfeld

The GPE and Grand Priory Trust's Lead and Deputy for Safeguarding

The GPE and Grand Priory Trust's Lead for Safeguarding is: James Pavey

The GPE and Grand Priory Trust's Deputy for Safeguarding is: Hannah Jennings

Date: 10 July 2026

Appendix 2 - Definitions

Abuse

Abuse is the violation of an individual's human and civil rights by any other person or persons (Department of Health 2000). 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:

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

Domestic abuse: behaviour by one person (A) towards another (B) directly or indirectly via conduct directed at another person:

when A and B are both aged 16 or over; and

A and B are or have been married or in a civil partnership, or have agreed to marry or enter into a civil partnership (even if that agreement has been terminated), or are or have been in an intimate personal relationship, or have or have had a parental relationship with the same child, or are relatives; and

that is "abusive" in that it consists of physical or sexual abuse, violent or threatening behaviour or controlling or coercive behaviour, economic abuse or psychological, emotional or other abuse;

A child may also be a victim of domestic abuse if they see, hear or experience the effects of the abuse, and is related to A or B. Domestic abuse can include forced marriage and "honour"-based abuse, including breast-ironing and Female Genital Mutilation ("FGM").

Emotional or psychological abuse: harmful behaviours that target a person's mental well-being so as to cause severe and persistent adverse effects on their emotional development and wellbeing and psychological trauma. 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. Emotional and psychological abuse can take many forms, including spiritual or faith-based abuse, radicalisation, criminal exploitation (including gang membership, County Lines and other forms of criminal exploitation).

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.

Neglect: 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. Organisational abuse (or institutional abuse) is the neglect or poor care of individuals within a care setting such as hospitals, care homes, or in-home care.

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.

Self-neglect: 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 (e.g., hoarding)
- inability to avoid harm as a result of self-neglect
- failure to seek help or access services to meet health and social care needs
- inability or unwillingness to manage one's personal affairs

Although it differs from other abuse types as it often lacks a perpetrator, self-neglect is a safeguarding matter because of the severe risk to the individual.

Sexual abuse: 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 nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse may also involve non-contact activities, for example upskirting or 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.

Adult at risk

There is no single law that defines an adult at risk across the UK. An adult at risk is a person over the age of 18 years (16 in Scotland) and is:

- having needs for care and support, and
- experiencing, or is at risk of, abuse and neglect and
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Adult safeguarding

Safeguarding adults at risk is defined in the Care and support statutory guidance issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse and neglect
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult's well-being is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

Child/young person

There is no single law that defines the age of a child across the UK. The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child “means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier” (Article 1, Convention on the Rights of the Child, 1989).

A child is anyone who has not yet reached their 18th birthday (16th in Scotland).

Child safeguarding

Safeguarding children is defined in the government's statutory guidance, “Working together to safeguard children” (as at 18 March 2026) as:

- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes