United Synagogue Whistleblowing Policy

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The United Synagogue

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US WHISTLEBLOWING POLICY

Introduction

Employees, volunteers and everyone representing the United Synagogue (the Charity) are expected to always conduct the organisation's business with the highest standards of integrity and honesty. Everyone is therefore encouraged to report any wrongdoing that falls short of these principles. This policy enables employees, volunteers, trustees, council members and others acting on behalf of the Charity to raise concerns about wrongdoing in a confidential manner.

Statement of Principles

- The Charity is committed to achieving the highest standards of integrity, accountability and safeguarding, and expects the same commitment from everyone working or volunteering for the organisation.
- The Charity aims to provide an open environment in which employees, volunteers, trustees and council members feel able to raise genuine concerns, with the confidence that they will be taken seriously, investigated appropriately and handled sensitively.
- Individuals should feel able to speak up without fear of retaliation or disadvantage.
- Nobody needs proof before raising a concern. A reasonable belief is enough.
- Raising a concern about a risk to a child or adult at risk is always the right thing to do.

This procedure complies with the Public Interest Disclosure Act 1998, as amended, including by the Employment Rights Act 2025.

Purpose

This process is intended to assist individuals who believe they have discovered serious wrongdoing, misconduct, risk, unlawful conduct or failures in governance. It is not designed to question financial or business decisions taken by the United Synagogue, nor should it be used to reconsider any matters which have already been addressed under grievance, complaint, disciplinary, dignity at work, volunteer problem-solving or other procedures.

Scope

Who This Policy Applies To

This policy applies to:

- Employees
- Workers, including agency and casual workers
- Volunteers

- Trustees and council members
- Contractors and consultants
- Anyone acting on behalf of the United Synagogue

This applies irrespective of department, function, seniority, or length of service.

Employees and workers may have additional legal protections under the Public Interest Disclosure Act 1998 where the requirements for a protected disclosure are met. Nothing in this policy limits or removes those statutory rights.

Volunteers, trustees and others who are not employees or workers do not generally have the same statutory whistleblowing protections. However, the United Synagogue will apply the protections and safeguards set out in this policy to all individuals covered by it.

Concerns Covered

This policy is intended to address concerns that are in the public interest. They may at least initially be investigated separately, but might then lead to the invocation of other procedures, e.g. disciplinary. Concerns may relate to something that has happened, is happening or is likely to happen, and could include:

- Criminal offences
- Fraud, theft or financial misconduct
- Bribery or corruption
- Misuse of charity funds or assets
- Sexual harassment
- Failure to comply with the United Synagogue safeguarding, child protection and/or adults at risk policies
- Abuse of authority or position
- Dangers to health and safety, or the environment
- Serious breaches of law or regulation
- Serious breaches of United Synagogue policies
- Risks to members, beneficiaries, volunteers, staff or the Charity
- Attempts to conceal any of these

Matters Not Covered

This policy is not intended to deal with routine operational issues, interpersonal disagreements, dissatisfaction with decisions, or concerns relating primarily to an individual's own employment or volunteering experience. Such matters should normally be raised under the Grievance

Policy, the Volunteer Problem-Solving Policy, the Dignity at Work Policy, the Complaints Policy or other relevant procedures.

Where a concern is raised under this policy but is considered more appropriately addressed under another policy or procedure, the United Synagogue may refer the matter to the appropriate process and will normally inform the individual raising the concern. Where a concern contains aspects of both whistleblowing and a personal concern, the United Synagogue may determine the most appropriate procedure for dealing with each aspect.

This does not apply to safeguarding concerns, which will always be handled as set out below, however they are raised.

Safeguarding Concerns

Any concern that a child or adult at risk has been harmed, or may be at risk of harm, must be reported to the Safeguarding team without delay, whether or not it is also raised under this policy. The whistleblowing process must never delay a safeguarding referral.

- Report to Claudia Kitsberg, Director of Safeguarding and Welfare and Designated Safeguarding Lead, or the Safeguarding team on 0203 758 8440.
- If a child or adult is in imminent danger, call 999.
- Where the concern relates to the Director of Safeguarding and Welfare, report it directly to the Chief Executive.

Where a concern involves an allegation that an employee, volunteer or anyone else working with children has harmed a child, may have committed an offence against a child, or has behaved in a way that indicates they may pose a risk to children, it will be managed under the procedure in Appendix 2, including referral to the Local Authority Designated Officer (LADO). Concerns about harm to adults at risk will be referred to the relevant local authority adult social care team where required.

Sexual Harassment

From 6 April 2026, a disclosure that sexual harassment has occurred, is occurring or is likely to occur is a qualifying disclosure in its own right under the Employment Rights Act 1996, as amended by the Employment Rights Act 2025. Employees and workers who report sexual harassment, including harassment of someone else, are protected from detriment and dismissal where the legal tests are met.

Sexual harassment means unwanted conduct of a sexual nature which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment, as defined in section 26(2) of the Equality Act 2010. This includes harassment by third parties such as members, visitors or contractors.

Concerns about sexual harassment can be raised under this policy or under the Sexual Harassment Policy / Dignity at Work Policy. Whichever route is used, the individual will receive the protection set out below. Where sexual harassment also raises a safeguarding concern, the Safeguarding Concerns section applies.

Safeguards

Protection

Individuals who raise concerns will be protected under this policy, provided the concern is raised:

- In good faith.
- In the honest and reasonable belief of the individual raising it that wrongdoing, misconduct or a risk has occurred, is occurring or is likely to occur.
- To an appropriate person (see Making a Disclosure).

No employee, volunteer, trustee, council member or other individual covered by this policy will suffer retaliation for raising a genuine concern in good faith. Retaliation may include dismissal, disciplinary action, removal from volunteer duties, exclusion from activities, harassment, victimisation, intimidation or any other unjustified disadvantage. Any person who retaliates against someone for raising a concern, or discourages someone from raising one, may be subject to disciplinary or other appropriate action.

Volunteers who raise concerns in good faith under this policy will be treated fairly and respectfully. The fact that a volunteer has raised a concern will not, by itself, result in adverse treatment. This does not prevent the United Synagogue from taking appropriate action in relation to separate safeguarding, conduct, performance or operational matters.

Confidentiality

The Charity will treat all disclosures in a confidential and sensitive manner. Information relating to a disclosure will be shared only on a need-to-know basis and to the extent necessary for the assessment, investigation and resolution of the concern.

The identity of the individual raising the concern will be kept confidential, so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information, and the individual may need to provide a statement as part of the evidence required.

Where there is a safeguarding concern, information will be shared with statutory agencies such as the LADO, police or Local Authority where needed to protect a child or adult at risk. Confidentiality cannot override this.

Anonymous Allegations

The Charity encourages individuals to put their name to any concerns they raise, as this makes it easier to investigate and to provide feedback. Concerns expressed anonymously will still be considered, and factors taken into account will include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of being able to confirm the allegation from other attributable sources.

Anonymous safeguarding concerns will always be assessed by the Safeguarding team.

Untrue Allegations

Concerns raised in good faith will be treated seriously even if they are not ultimately substantiated. If an individual raises a concern in good faith which is not confirmed by subsequent investigation, no action will be taken against them. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary or other appropriate action may be taken against that individual.

Making a Disclosure

The Charity expects staff and volunteers to use the whistleblowing procedures in place rather than air their concerns outside the organisation, although nothing in this policy prevents anyone from making a disclosure to an external body where permitted by law (see Investigating Procedure). Safeguarding concerns may always be reported directly to the LADO, police or local authority.

Concerns should be raised following the flow set out in Appendix 1:

- Step 1: Report the concern to the Chief Executive.
- Step 2: If the matter is extremely serious or sensitive, or involves the Chief Executive, report it to the President.
- Step 3: At any stage, if the individual is not confident approaching the people above, they can contact the LADO, the NSPCC Whistleblowing Advice Line or another appropriate external body.

The steps do not have to be followed in order.

Any member of staff or volunteer who receives a concern must pass it to the Chief Executive as soon as possible, and immediately to the Safeguarding team if it involves a safeguarding issue.

On receiving a concern, the Chief Executive will appoint an investigating officer, normally the appropriate Director or a senior manager with no connection to the concern. Where the concern relates to the Chief Executive, the President will appoint an appropriate investigating officer. Nobody will investigate a concern about themselves or one in which they have a conflict of interest.

If an individual is unsure whether or how to raise a concern, they may approach the Chief People Officer or the Director of External and Legal Services, who can advise them on the implications of the legislation and the possible internal and external avenues open to them. Independent advice is also available from Protect, the whistleblowing charity, on 020 3117 2520.

If there is evidence of criminal activity, the investigating officer should inform the police. The United Synagogue will ensure that any internal investigation does not hinder a police investigation.

Timescales

Due to the varied nature of these concerns, which may involve internal investigators, the LADO and/or the police, it is not possible to lay down precise timescales for investigations. The

investigating officer should ensure that investigations are undertaken as quickly as possible without affecting their quality and depth.

The investigating officer should, as soon as practically possible and normally within five working days, send a written acknowledgement of the concern to the individual who raised it, and thereafter report back to them in writing on the outcome of the investigation and the action that is proposed. If the investigation is prolonged, the investigating officer should keep them informed in writing of its progress and when it is likely to be concluded. All correspondence should be sent to an address or email agreed with the individual.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the concern should be obtained.
- The involvement of the police, the LADO, the Charity's internal or external auditors or a regulator should be considered at the outset, in consultation with the Chief Executive or President, and with the Director of Safeguarding and Welfare on any safeguarding aspect. Where the LADO or police are involved, the internal investigation will only proceed as agreed with them.
- The investigating officer should inform the person against whom the concern is raised as soon as is practicable, unless doing so would compromise a safeguarding or police enquiry. They will be informed of their right to be accompanied by a trade union or other representative at any interview or hearing held under these procedures.
- The concern should be fully investigated by the investigating officer, with the assistance where appropriate of other individuals or bodies.
- A judgement concerning the concern and its validity will be made by the investigating officer. This will be detailed in a written report containing the findings of the investigation and the reasons for the judgement. The report will be passed to the Chief Executive or President as appropriate.
- The Chief Executive or President will decide what action to take. If the concern is shown to be justified, they will invoke the disciplinary or other appropriate internal procedures, and consider whether a serious incident report to the Charity Commission or a referral to the Disclosure and Barring Service is required.
- The individual who raised the concern should be kept informed of the progress of the investigation and, where appropriate, the final outcome. Some details may be withheld for confidentiality or legal reasons.

If appropriate, a copy of the outcome will be passed to the Charity's internal and external auditors to enable a review of procedures.

If the individual is not satisfied that their concern is being properly dealt with, they have the right to raise it in confidence with the Chief Executive, the President, or one of the advisers named in Making a Disclosure.

Nothing in this policy prevents an individual from reporting concerns to a regulator, law enforcement agency or other appropriate authority where permitted by law, including prescribed persons such as the Charity Commission and the Health and Safety Executive. Employees, workers and former employees may have additional rights under the Public Interest Disclosure Act 1998 in relation to protected disclosures. The United Synagogue encourages concerns to be raised internally where appropriate so that they can be addressed promptly and effectively. Safeguarding concerns may always be reported directly to the LADO, police or local authority.

Associated Policies

- Safeguarding and Child Protection Policy
- Adults at Risk Policy
- Safeguarding Code of Conduct
- Sexual Harassment Policy
- Dignity at Work Policy
- Volunteer Problem-Solving Policy
- Complaints Policy
- Disciplinary Policy (available from HR department)
- Grievance Policy (available from HR department)

Review

This policy will be reviewed periodically and updated where necessary to reflect changes in law, regulation, governance arrangements, organisational learning or operational practice.

Appendix 1 – Whistleblowing Flow

How to raise a concern

When raising your concern, it is advisable that you report it as early as possible. A significant delay in reporting the matter may make the subsequent investigation difficult to pursue.

Please note you do not have to work through these steps in order and can jump to Step 3 should you think this is appropriate.

If a child or adult is in imminent danger, call 999. For any concern about harm to a child or adult at risk, also contact the Safeguarding team immediately: 0203 758 8440.

Step 1

As a first step, you should report any concerns to the CEO.

Contact Details	
Jo Grose	CX@theus.org.uk

If you feel hesitant about putting your concerns in writing at this stage, you should speak to the CEO and arrange to meet with them. However, you may be asked to put the details in writing at a later stage.

Step 2

If you feel the matter is extremely serious, sensitive or involves the CEO, you may report the matter, in the manner set out in Step 1 above, to the President.

Contact Details	
Saul Taylor	president@theus.org.uk

Step 3

If you are not confident in approaching any of the named persons in Steps 1 or 2 then, to raise your concern**, YOU CAN AT ANY STAGE CONTACT**:

Contact Details	
Local Authority LADO	https://national-lado-network.co.uk/
NSPCC Whistleblowing Advice Line	0800 028 0285 or help@nspcc.org.uk
Protect	020 3117 2520
Other	https://www.gov.uk/whistleblowing/who-to-tell-what-to-expect

Appendix 2 – Managing Allegations Against Staff and Volunteers

Flowchart of managing a safeguarding allegation against a member of staff or volunteer

This flowchart sets out the process for allegations relating to children. Where an allegation relates to an adult at risk, the same steps are followed, but the case manager refers to the relevant local authority adult social care team (including its Person in a Position of Trust (PiPoT) lead where one exists) in place of the LADO, and informs the police where a crime may have been committed.

Allegation is made against a member of staff or volunteer. Staff or volunteers will share the information immediately with Claudia Kitsberg (Director of Safeguarding and Welfare). If the allegation concerns the Director of Safeguarding and Welfare, it is shared with Jo Grose (CEO).
⬇
The Director of Safeguarding and Welfare (case manager) will gather basic facts only, without investigating. Consider whether the individual needs to be moved to non-contact duties, or stood down from volunteering. Suspension is not automatic.
⬇
Review the 'Allegations threshold' and contact the LADO the same day where possible if the threshold has or may have been met (within one working day maximum). Follow all advice given by the LADO.
⬇
Ensure all relevant internal recording forms and external referral forms are completed.
⬇
Claudia Kitsberg (Director of Safeguarding and Welfare) will inform Jo Grose (CEO).
⬇
Inform the individual of the concerns or allegations and likely course of action, only once agreed with the LADO and police.
⬇
Inform the parents or carers of the child/children involved, as agreed with the LADO.
⬇
The case manager (Claudia Kitsberg) will attend the Allegations Strategy / Evaluation meeting if convened by the LADO. OR Complete internal investigation, where agreed with the LADO.
⬇
The case manager notifies the outcome of the investigation to: • LADO • Parents or carers *Make a referral to the DBS where the individual has been removed from regulated activity, or would have been had they not left, because they harmed or posed a risk of harm to a child or adult at risk. This applies to employees and volunteers, including those who resign. *Consider whether a serious incident report to the Charity Commission is required.
⬇
The case manager must ensure all record-keeping requirements are met.