

## **UOHC Closing Submission**

**04/09/2020**

In our closing submission to the Inquiry, the Union of Orthodox Hebrew Congregation (UOHC) reiterates our commitment to protecting children in the Charedi community from harm.

We know that there are child predators across all parts of society and walks of life. Religious settings are not exempt. We are deeply aware of the devastation caused by child abuse, and its lifetime impact on victims. Even though the UOHC does not operate synagogues or run services for children, as a religious leadership organisation we will take every appropriate measure to protect the children in our communities and keep them safe.

From our witness statements and oral testimony, along with the testimony of other organisations working in the Charedi community, the Inquiry has heard how in recent years child safeguarding in our communities has been strengthened. The Inquiry has heard about the extensive collaboration between Interlink and local authorities, the provision of safeguarding training to hundreds of people working with children every year, the support available to Charedi organisations to put in place strong Safeguarding Policies and Procedures, and the improved support for victims. This work has been vast, and should not be undermined or, when a weakness is at times identified, mischaracterised as 'disguised compliance'.

The Inquiry has also heard the UOHC's Rabbinate's unambiguous position on reporting child abuse; there is no religious justification for allowing perpetrators to go unchecked in the community. Neither the rules of mesirah, nor any other tenets of Orthodox Judaism, are grounds to refrain from disclosing incidents of child abuse.

The Inquiry has provided the UOHC with the opportunity to pause and take stock, and to consider what additional steps we and our community should be taking in relation to safeguarding. This is not a one-off exercise but will continue over time and we set out below how our thinking has developed so far. We also set out matters for the Inquiry to consider when formulating its recommendations for keeping children safe in the future, and we thank the Inquiry for this opportunity.

### **1. A Safeguarding Policy**

In the past the UOHC has not had a Child Safeguarding Policy on the premise that we do not run synagogues or work directly with children.

Going forward, the UOHC intends to develop a Child Safeguarding Policy, to set out clearly our position and expectations in relation to child protection and to address situations that could arise. We believe that this will provide greater clarity and remove any ambiguity, and will also send a signal in our community about the importance of safeguarding.

### **2. DBS Checks**

Many members of the UOHC Rabbinate and Executive already have DBS checks because of other roles they hold. Going forward, we will implement DBS checks for all people holding positions of authority directly via the UOHC.

The UOHC has not experienced some of the challenges identified by other organisations in interpreting the definitions of regulated activity or in carrying out DBS checks. But we would welcome any clarification and simplification in this process to ensure there is no room for confusion.

### **3. Promoting strong safeguarding policies and training in Charedi settings**

There is considerable safeguarding expertise in the Charedi community, resting particularly in the Interlink Foundation and in Shema Koli. These organisations support compliance and good practice among other organisations, and promote awareness generally. The UOHC does not seek to duplicate the work of these organisations, but will give them the fullest support and encouragement. If UOHC members or other community organisations seek support or information relating to safeguarding, we will signpost them to these organisations.

Having followed the Inquiry closely, we reiterate our position on the following matters:

- It is very important to undertake targeted and culturally specific safeguarding work for religious minority groups. This applies across all types of initiative such as victim support, advice services, training and awareness-raising. Targeted work ensures that safeguarding initiatives reach the required audience and have relevance to the particular circumstances and risks in minority communities. A universal generic approach will not achieve this.
- We do not believe that standardisation across all religious settings, for example training materials or documentation, would be of value. There are, as was clear from the evidence given to the Inquiry, too many differences between individual faiths – including different denominations within the same faith - for this to be of use. We believe that different faith groups should all be working on the basis of national guidance and implementing this in a tailored way in their own community.

### **4. Victim support**

Victims of abuse seek support in different ways. Some turn to a rabbi, others to a trusted friend or relative. Still others turn to formal services, such as the Shema Koli helpline for abuse victims. To have a broader range of options is to offer better support for victims.

Rabbi Baumgarten testified that the UOHC's own helpline has been rarely used. The UOHC appreciates that one reason for that may be that some people will prefer to speak to an organisation such as Shema Koli which is focused on providing victim support, as opposed to UOHC which has a much wider remit.

The UOHC will now consider whether it should persist in offering its helpline or whether it should instead focus on supporting knowledge and awareness of Shema Koli.

## **5. Engaging positively with the local authority**

There are many Charedi organisations and representatives that work collaboratively with the authorities and secular organisations. This is essential for community cohesion. The Inquiry has seen extensive evidence from the Interlink Foundation about positive engagement, particularly in respect of safeguarding. It was therefore troubling to hear from the Chair of City and Hackney Children's Safeguarding Partnership and from Ofsted about the perceived refusal of the Charedi community, and the UOHC in particular, to work with external bodies.

We reiterate the UOHC's commitment to good partnership working across the community and the authorities.

The UOHC was interested to note the positive work in other local areas, for example Bradford Child Safeguarding Board and its work with the Council of Mosques, which demonstrates how a trusting and collaborative approach can work to the benefit of all.

The UOHC does not consider that the recommendations made by Mr Gamble to give local authorities powers of enforcement, would have the desired results. Greater bureaucratic enforcement is unlikely to result in greater engagement. On the contrary it may contribute to the negative spiral of disengagement that is already in evidence. Disengagement does not promote child safeguarding. This is unfortunate particularly because there is no difference of opinion between the different organisations about the importance of keeping children safe, and working together is entirely possible as evidenced by the many examples of collaboration.

Further to the Inquiry, the UOHC will encourage and support yeshiva representatives to reopen local discussions about safeguarding children and will seek out positive partners. We recommend that these discussions focus specifically on safeguarding and avoid conflation with other areas such as the curriculum in yeshivas.

## **6. Increasing regulation**

We are concerned about whether increased regulation, designed to capture settings currently below the registration threshold, would result in an overall positive impact on children. It is preferable to improve safeguarding through creating greater awareness and real cultural change, rather than the imposition of regulation. We are concerned that increased regulation could have unintended negative consequences on provision as it might lead to the loss of valuable provision by smaller organisations. This would impact on children of all faiths and none, while not providing real safeguarding benefits.

We are also doubtful about the need or value of a scheme for registration and regulation specifically of religious settings. It is unclear what the kaleidoscope of religious settings in the UK have in common that sets them apart from children's settings generally, why there should be

a different set of standards for religious settings, or how a scheme for regulation of religious organisations would differ from the general regulation of settings for children.

The voluntary code of practice for out-of-school-settings, published for consultation by the Department of Education, has been a useful guide and further co-ordinated guidance of a similar nature, possibly produced by the Dept of Education and the Charity Commission working together would be beneficial.

## **7. Mandatory Reporting**

We have concerns about the widening of mandatory reporting for people in religious roles. This could have a stifling effect on vital pastoral support that victims need. Victims should be able to open up about their experiences before they have made courageous decisions about disclosure, and without foreclosing their choices. People need to have the confidence to share their experience of abuse without this inevitably resulting in their allegation being reported.

## **8. Positions of Trust Definition**

We would welcome the extension of the definition of positions of trust. Should there be any amendment to the Sexual Offences Act 2003 to extend the definition of position of trust to include faith leaders, this should be suitably defined to ensure that in the context of the Jewish community it refers to “ordained rabbis” or people appointed to a position of leading a congregation.