

Independent Lessons Learned Review (incorporating an Audit of Safeguarding Arrangements)

Concerning Jonathan Fletcher and
Emmanuel Church Wimbledon

Published: 23 March 2021

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Acknowledgements

The Reviewers wish to express sincere gratitude to all participants and to the Independent Advisory Group who have contributed to this review. For many, this came at a cost and demonstrated great courage as insights and experiences were shared. The team would like to recognise the great value these contributions have made towards the findings and recommendations of this report.

It is recognised that some of the content of this report may be distressing. There are a range of services where support can be sought. These services and organisational contact details are outlined on the final page of this report.

Executive Summary

Thirtyone:eight was commissioned to undertake an independent Lessons Learned Review by Emmanuel Church Wimbledon (ECW) in December 2019 in response to the growing number of concerns and allegations being made in relation to its previous Vicar Jonathan Fletcher (JF) and the prevailing culture within the church.

An Independent Advisory Group (IAG) was established to provide guidance and scrutiny of the Review process and Dr Lisa Oakley and Mr Simon Plant were appointed as the Reviewers. The scope of the Review was developed by thirtyone:eight and finalised by the IAG. Calls for participation in both the IAG and the Review were advertised from 5th December 2019.

A Lessons Learned Review is not a formal fact-finding investigation but is to provide an external individual or organisation the opportunity to gather and analyse information from a range of sources in relation to an event or series of events in order to draw evidence-based conclusions and make recommendations.

The methodology adopted largely followed a systems approach for case reviews¹. This approach allows for exploration of why and how behaviours develop and importantly requires reflection on both failings and good practice of individuals, cultures, and systems.

98 participants provided information to the Review. Participation was via interview or providing written answers to questions or written submissions. 59 participants were members or former members of ECW², 33 were role holders or former role holders and 27 were victims or those who had experienced the behaviours focused on in this report³.

JF was directly invited to participate in the review through letters sent from the Reviewers. Five letters were sent to JF between May 2020 and December 2020 expressing the commitment of the Reviewers to his inclusion in the interests of fairness and transparency.

¹ <https://www.scie.org.uk/publications/guides/guide24/introduction/learning.asp>

² The definition of member used by the Reviewers includes those who were regular attendees for at least a year

³ It is important to note that some of those who experienced the behaviours stated this was consensual and not abusive and did not identify as victims

He did not take up the offers to participate by phone, online or written questions and therefore did not contribute to the Review process.

The Reviewers spoke to participants with a variety of experiences of JF including many who contacted them to inform the Review of deeply harmful behaviours experienced from JF. Others contacted the Review to request that their positive experiences were included. The positive experiences reported dispel the myth that people with positive attributes are not capable of committing abusive behaviours. The positive experiences also acted against disclosure, it being difficult to disclose in a context where the individual and their ministry is perceived positively by many. This is one of the reasons why it took so long for abuse allegations to come to light and not to be disclosed at ECW. The Review evidences that a person who possesses positive characteristics and is widely highly-regarded, could nonetheless display entirely inappropriate, abusive and harmful behaviours which render them unfit for their office.

Various forms of harmful behaviour from JF were reported by participants. These included coercion and control, bullying, and some referred to their experiences as spiritual abuse (See C 1.1). There were reports of naked massages and saunas, forfeits including smacking with a gym shoe, and ice baths. These behaviours are already in the public domain as a result of press coverage in 2019 and 2020.

In addition to the behaviours set out above, during the review a serious incident of a sexual nature was reported. One participant reported that JF told him to perform a sex act in front of him and when he did not, JF performed the act instead. This behaviour demonstrates a gross abuse of power and in the opinion of the reviewers is far beyond anything which can be deemed acceptable or appropriate from a minister in a position of power, trust and responsibility. Further, it raises a question regarding whether this would be regarded as misconduct in a public office. We conclude that very few, if any, knew about this incident prior to 2017. We state for the record that JF has never been charged with or found guilty of any offence.

Some described these incidents as non-consensual and reflected on the power imbalance in the relationship and the inappropriateness of an ordained minister suggesting such behaviours to an individual in a lesser position of power. Some participants describe some of the behaviours as consensual and contacted the Review to request that their view that the activities were consensual was noted. The Reviewers have reflected on the nature of consent where there is an imbalance of power and where there is potential detriment to the person if consent were not to be given. These factors question the understanding and legitimacy of the notion of consent, in at least some of the reports.

The Reviewers note that JF has publicly apologised for some of the behaviours but has stated that *'Anything that happened was totally consensual and non-sexual.'* On 19 April 2020 he was quoted in *The Daily Telegraph* as having said he is: *'deeply, deeply sorry for the people I've harmed.'* On 20 April 2020 he was quoted in *The Daily Telegraph* as saying: *'I have apologised unreservedly to anybody I have hurt and I don't know what else to say'.*

The behaviours and lack of recognition by JF of the harm caused evidenced in some of the documentation reviewed, lead to the conclusion that there are significant and ongoing safeguarding concerns related to JF. These include within mentoring relationships or ministerial activities. The Reviewers recognise that Permission to Officiate (PTO) has been removed and therefore JF cannot any longer conduct certain aspects of official ministry. However, there is a need for clarity that the significant and ongoing safeguarding concerns relate to all aspects of Christian influence and ministry, including, but not limited to, personal work, pastoral care and mentoring.

On the balance of evidence, it is clear that bullying/spiritual abuse was known about prior to 2017 and little or no action was taken to address this by role holders and leaders at ECW at the time. The massages and saunas were also not hidden behaviours. We consider on the basis of all the information gathered that at least some of these behaviours were known about prior to 2017 and there were opportunities for action to have taken place sooner.

The Reviewers conclude that the behaviours are completely unacceptable for someone in a position of spiritual authority and constitute an abuse of spiritual authority and power, falling far short of the expectations, obligations and duties of those in Holy Orders. This conclusion is irrespective of whether the behaviours were deemed to be consensual by those involved or not.

JF was reported by some as an excellent teacher with a rare preaching gift. Under his leadership ECW was perceived by some as a very successful church, as the congregation grew significantly in number and profile. It was a place which became and remains a family to many. It also offered a home to those who wanted to explore Christianity intellectually. It undoubtedly provided solely positive experiences of church life for many who attended. We however, question whether a church should continue to be defined as entirely successful given the information gathered around harmful behaviour experienced and the aspects of unhealthy culture that have been reported.

The positive aspects of JF's character, his reported kindness, hospitality and care contributed to the delay in abusive behaviours coming to light but there were also other factors. These include JF's domineering and bullying behaviour, a focus on protecting the gospel and assumptions of homogeneity. There was also a lack of shared understanding about behaviours experienced by some as bullying or spiritually abusive. The normalisation of behaviours was clear, many reported fear, and some noted a lack of an external body to disclose to.

The examination of cultural elements of ECW gives an insight into how abuse could occur and not be disclosed. One of the key factors underpinning this is ECW as interconnected to the Church of England (CofE) whilst simultaneously independent (as a proprietary chapel).

ECW was and continues to be interconnected and have ongoing relationships with many organisations in the wider Conservative Evangelical (CE) constituency. An individual who holds a position of esteem in such networks holds a position of power, even if such power is not reflected in an official organisational position within the network.

The Review evidenced that JF was a man of great charisma and of significant influence in this sphere. His ability to exercise this influence came in part from being a deeply influential person within a much broader interconnected network, exercising great influence over career placements and being referred to as a 'king maker'. JF's approval was prized and noted by many as essential for career progression in this constituency.

Participants emphasised that to understand the culture at ECW there needs to be an understanding of the cultures of overlapping sectors of the CE constituency. The view of leadership, muscular Christianity and exclusivity was reported to pervade much of this culture and was reflected, at least in part at ECW. The focus on public-school background and the connection for many to Iwerne, where for some relationships with JF were established, framed the context and served as a catalyst to some of the harmful relationships later reported. Importantly, it was also a place where models of leadership, discourses of protecting the gospel and the celebration of masculine Christianity were

embedded in the lives of many. The relationships formed there continued into adulthood and impacted training choices, career aspirations and theology.

It is important to note that JF was, and is, responsible for his behaviour and decisions made whilst holding a ministerial position.

Whilst JF is personally responsible for his behaviour, examination of the wider culture is important. Some participants commented on there being a culture of leadership on a pedestal, a lack of diversity and accountability, a far reaching and intertwined network and the ability to impact on career aspirations.

It is important to note that the Reviewers are not suggesting all CE organisations are implicated in this report. However, it is essential that organisations review, and hold themselves to some external account, to ensure that the lessons learned from this Review can be enacted.

Due to JF's status in the wider CE constituency, one suggested reason for delayed disclosures was the impact on the wider constituency if behaviours were exposed. There have been some allegations about other leaders within the wider CE community deliberately masking events and behaviours and controlling the narrative around this case. There have also been discussions of negative discourses within parts of the CE community around participating in this Lessons Learned Review, with some reporting being asked either not to participate or keep comments very brief.

The combination of JF's personality and influence within and beyond ECW created a situation in which he held relational and institutional power. This enabled behaviours to occur and be unlikely to be identified as harmful. If behaviours were identified as harmful, they were unlikely to be disclosed and, until recently, unlikely to be actioned.

Whilst ECW was interconnected it was simultaneously independent. There is a clear theme in the evidence that ECW regarded itself as separate from the Diocese and this is, in part, due to its proprietary chapel status, being financially independent of the CofE. However, it was also due to theological differences between the Diocese and ECW. The Diocese was seen as 'liberal' and therefore also seen with some suspicion. This resulted in a negative lens around safeguarding to a large extent as something imposed by the Diocese.

The longstanding strained relationship between ECW and the Diocese is reported as a factor in what we deem to be the lack of effective response to the disclosures and other concerns regarding the behaviour of JF and other safeguarding issues that were raised during JF's incumbency.

Some participants reported a lack of clear information over the removal of PTO and the reasons for this. This left a void in which different narratives were provided (by JF and others) which enabled JF to continue to lead some Christian events or meetings.

The evidence gathered illustrates that the process of removal of PTO is problematic and lacks clarity. How information is shared about the removal of PTO, and who it is shared with must be urgently addressed. As the removal of PTO only prevents the church officer from carrying out certain aspects of recognised ministry in the CofE, this means that other aspects of the role clearly related to Christian ministry can continue; for example, leading church weekends etc. The situation is further complicated as the removal of Holy Orders is not in place for those whose PTO has been removed due to issues of misconduct or abuse. It is a recommendation of IICSA that, in addition to PTO removal, Holy Orders should also be removed in cases of child sexual abuse. The Reviewers would argue that Holy Orders should also be removed for cases where safeguarding concerns related to

children or adults are upheld in order to prevent the perpetrator gaining access to potential victims in contexts outside their ministry.

The Reviewers have considered all experiences - both positive and negative; information presented by participants, information from ECW, the Diocese of Southwark, the National Safeguarding Team (NST) and information in the public domain to give an honest opinion in reaching conclusions and making recommendations in this report. The Reviewers believe it is in the public interest for all details contained within this report; its background, findings, conclusions and recommendations, to be published.

Some participants reflected that JF was able to continue to have an influence on the constituency and, to some extent, on ECW after his tenure as Vicar of ECW had ended when he retired. Due to ongoing relationships with those at ECW and the proximity of his residence, it was reported that he had some ongoing influence at ECW after 2012.

There were a large number of factors around policy, procedure and process for reporting abuse at ECW that prevented earlier disclosure or action being taken.

A review of safeguarding demonstrated that the required understandings and frameworks did not develop within ECW at the same rate as other CofE churches.

The safeguarding audit and interviews demonstrated a lack of policy, process and procedure in place within ECW during JF's period as Vicar. In addition, a celebration of informality, a lack of recording or confidentiality and the lack of value placed on safeguarding undermined confidence in being able to disclose or raise concerns.

There was a lack of HR processes and procedures around contracts/statement of particulars, staff handbook and grievance and whistleblowing procedures.

Structures in place suggested the appearance of internal accountability, but the evidence shows a lack of any real internal or external accountability.

A negative discourse around safeguarding reported by some, is also considered to have impacted disclosures and response.

In the period of JF being Vicar there was no official safeguarding lead. The expectation would have been that the Vicar would have reported any inappropriate behaviour or abuse. JF was in essence safeguarding lead by default. Given that his behaviour was a cause for concern, this raises real challenges to effective and timely disclosure by others.

The information gathered does raise some practice issues regarding response to reports and knowledge of bullying behaviours and cultural issues between 2001 and 2003. Other information shared with the Reviewers also raises concerns. Where the Reviewers believe that these do not meet the expectations of practice at the time or represent ongoing concerns, these will be raised with the Parish Safeguarding Officer and with the Diocesan Safeguarding Officer to ensure appropriate action is taken with the necessary external scrutiny and accountability.

The response to the disclosures by ECW from 2017 does include some aspects of good practice and the present safeguarding officer at ECW was recognised for her contribution by a number of participants.

The situation has been made more complex by JF's continued behaviour including the use of power and influence to critique and undermine his successor's ministry, poor working relationships and mistrust between ECW and the Diocese together with a lack of clarity around roles and responsibilities especially in relation to proprietary chapels.

The absence of a formal case management system within the CofE's National Safeguarding Team and the decision not to designate the case as an NST case, despite it seeming to match the criteria, further contributed to a lack of effective response.

The published criteria for a reported matter to become an NST case is where a church officer is of high status, a bishop, a dean, an archdeacon or one who has a high profile. Given the widely acknowledged profile and influence JF held, and the media interest in this case, it was surprising to the Reviewers that this did not become an NST case. There is no clear rationale for why this did not become an NST case as it is a high profile individual likely to gain media attention. The decision-making process around this case has not been made available and some participants reported that it was not documented. For the sake of clarity and consistency, this absence of evidence-based decision-making is of significant concern.

A further complication is the current definition of vulnerability for adults. This definition is particularly pertinent for this report. Where the Review Team were aware of individuals who may have experienced potential criminal offences, they have ensured that the appropriate safeguarding and reporting processes have been undertaken. Those involved in any of the behaviours by JF detailed in this report would not have been regarded adults at risk of harm under statutory definitions⁴. However, the argument can be made that those who are in contexts in which damaging coercion and control are exercised upon them could be rendered vulnerable or at risk by this experience. Current statutory definitions do not take account of this impact of coercion and control. We also consider that the issue of consent requires further legislative scrutiny in contexts where there is a significant imbalance of power and/or status and/or age including in a religious context.

A safeguarding audit confirms that substantial progress has been made with regards to both HR and safeguarding within ECW. There are positive cultural changes including plurality of leadership, changes to governance, safeguarding as embedded, and the inclusion of more women in leadership positions. A significant amount of work has been conducted in the area of HR. Safeguarding has developed at a substantial rate, including regular training which is monitored and recorded. There are examples of excellent risk assessments and a focus on working safely. Messages about the importance of safeguarding and key role holders are communicated clearly.

Whilst there are still some areas to develop, the Reviewers have seen evidence of clear commitment to HR and safeguarding as part of the ministry of ECW.

However, a recent sermon preached at ECW related to the Review publication is a cause for concern for the Reviewers as it does not reflect the change in culture evidenced in other aspects of HR and safeguarding. When viewing organisational culture from the broadest perspective, it is possible for advances in one area of activity to be counteracted by difficulties evidenced elsewhere. A holistic and comprehensive view of culture is therefore required to gain an overall impression.

ECW sought external safeguarding support. Whilst this is good practice in principle, no formal agreement was in place for this external safeguarding support and the information sharing that took place. Concerns about whether the information sharing process fully adhered to best practice principles have been raised with ECW. ECW have sought legal advice regarding this issue and consider they have adhered to the Data Protection Act and GDPR expectations. Thirtyone:eight provided ECW with details of best practice principles regarding data and information sharing. Given the need to demonstrate adherence to best practice principles in sharing sensitive information about individuals, thirtyone:eight asked

⁴ <https://www.scie.org.uk/safeguarding/adults/introduction/what-is>

ECW to make contact with all affected individuals whose information has been shared, (even in a pseudonymised form) ahead of the Review publication. This recommendation was made by the Reviewers in advance of publication out of concern that those whose information had been shared should not read this for the first time in the publication of this Review. ECW Have informed the chair of the IAG that they have actioned this recommendation.

Overall, this Review demonstrates harmful and inappropriate behaviour from JF towards others. Evidence suggests that knowledge of these behaviours was held by some role holders at ECW and some members of ECW congregation. It details some of the factors present at ECW which worked against disclosure and effective response. It also provides evidence of the role that the interconnectedness of Iwerne and other parts of the CE world played in what happened at ECW. Where 'protecting the gospel' or 'protecting the network' is synonymous and seen as the ultimate goal, where institutions are prioritised over individuals, where there is no, or insufficient external oversight or accountability and where psychological maltreatment is down-played and dismissed, the potential for harm is significant.

There is some evidence of positive experiences of JF and ECW, which remain for many. These have to some extent worked against disclosure.

There has been substantial investment and commitment to safeguarding in ECW in recent years. There are multiple lessons to learn and the recommendations are detailed below. However, it is important to note that the recommendations below will only be implemented if the unhealthy aspects of the underlying culture are addressed. If these aspects of unhealthy culture are not fully addressed, then it is likely that any learning and improvement from the implementation of recommendations will be limited in its effectiveness. There also needs to be reflection on the impact of external cultures on these aspects of unhealthy culture at ECW.

Thematic Recommendations

Given the findings of the review, and in particular the recognition of there being insufficient and protective accountability both internally and externally, there is potential for these recommendations to not be fully actioned. To this end, the initial recommendation is to ensure that appropriate external support is gained to provide robust accountability for the full implementation of these recommendations.

Part 1: Opportunities for learning and improvement within ECW

Theme 1: Developing healthy culture

It is recognised that ECW have made significant steps to addressing issues related to safeguarding and HR since the disclosures occurred however concerns remain about some persistent aspects of unhealthy culture, described by some participants as a culture of fear. The recommendations below will only be effective if the unhealthy aspects of the culture noted in this Review are fully addressed and changed.

ECW need to continue to reflect on the cultural elements described in sections C1-4 that allowed behaviour to occur and not be disclosed. Changing culture is a lengthy process.

Recommendation 1

The Trustees and Leadership Team should develop an action plan to address aspects of unhealthy culture and develop healthy cultures. This would illustrate commitment and allow accountability for addressing cultural issues remaining within ECW. It is recognised that some of this work will take place in leadership groups, but it is also essential to include the whole congregation as cultural change occurs most when all members of the culture are involved in the process. The Trustees should monitor progress against this action plan and report progress to the Charity Commission as appropriate ensuring external accountability. A clear time scale for the completion of the plan should be drawn up and this should not extend beyond five years. This time frame allows acknowledgment of the number of recommendations but ensures a timely completion to underpin good safeguarding and ongoing development of culture.

Recommendation 2

The Leadership Team and the Safeguarding Officer should ensure there is teaching on developing a healthy culture and the hallmarks of this and to include material on bullying, manipulation, coercive control and spiritual abuse as part of this to raise awareness of these behaviours and their impact and to explore best practice for response in order to create a healthy culture in which these behaviours are more likely to be recognised and responded to effectively in the future.

Theme 2: Healthy leadership, governance and accountability

There have been changes to leadership and governance and accountability structures within ECW since 2012 and many of these are positive. However, some concerns still remain.

It is the opinion of the Reviewers that the aspects of unhealthy culture at ECW and more broadly across the affected CE constituency might only be addressed fully by those having played a key role in the establishment and maintenance of that culture to no longer enjoy the influence they have had to date (i.e. considering their positions and stepping down). It is not for this review to determine the details of how this should take place, but it should be recognised and considered as a necessary part of a demonstrable commitment towards a safer, healthier culture.

Recommendation 3

Trustees should undertake a review of those in leadership roles and structures at ECW. If any individuals within this are identified as an ongoing threat or obstacle to creating safer places within the church this should be discussed with the Diocese and/or the NST where appropriate in order for action to be taken. The Trustees of ECW should make further efforts to highlight and commit to further action where harm has been caused. This needs to be undertaken within an understanding that this may require some external support, accountability and scrutiny.

Recommendation 4

All in leadership and role holder positions (both currently and formerly) at ECW should continue to reflect upon their own behaviours and commit to further formal processes that can identify where there may be need for change and improvement and any further action or training that is appropriate.

Recommendation 5

All in leadership positions and role holders at ECW should engage with healthy leadership training delivered by organisations beyond the current constituency.

Recommendation 6

The Leadership Team and Trustees should review the process for the appointment of Elders. Appointment of Elders should be a transparent process and include engagement from the congregation. This creates accountability and encourages diversity.

Recommendation 7

The Church Wardens should meet regularly with the Vicar to provide support, wellbeing checks and to embed accountability.

Recommendation 8

The Leadership Team should review communication strategies to ensure the congregation have the opportunity to be fully informed of any ongoing work related to the Review and the implementation of recommendations, consideration should be given to different methods for sharing information to ensure information is accessible to all.

Recommendation 9

The Safeguarding Officer should create a structure for congregational members to be able to raise low level concerns that do not reach a safeguarding threshold. These should be held centrally in ECW in order to pick up any patterns of behaviour.

Recommendation 10

The Trustees and Leadership Team should continue to develop the relationship with the Diocese of Southwark, CofE structures and the House of Bishops. This development of relationships should ensure ECW is accountable and does not operate as independent from the Diocese or other CofE structures. This should also ensure the status of proprietary chapel is not seen as a license for independence.

Recommendation 11

The Trustees and the Leadership Team at ECW should ensure that all staff are fully committed to the appraisal process.

Recommendation 12

The Trustees and Leadership Team should explore whether there is an external body who could handle complaints if there is no resolution after the Trustees' stage.

Recommendation 13

The ECW committee for mission funding should reassure itself that its duty of care has been undertaken for any mission partners that are funded. This reassurance should ensure:

- That professional mission organisations that are used by mission partners have adequate safeguarding policies and practice.
- That this includes an awareness of different laws and cultures.
- That any risk associated with mission partners is assessed and revisited in response to any new information.
- That there is an assessment of support needed for any mission partners that have been affected by the behaviour of JF.

Theme 3: Effective safeguarding culture and practice

There have been significant improvements in safeguarding policy and practice in ECW since 2012. There are however some actions that have been highlighted by the safeguarding audit at Appendix One and these are highlighted in the following recommendations.

Recommendation 14

The Leadership Team and Safeguarding Officer should continue to further develop the response and range of support for victims of abuse (not solely related to JF's activities). This should include a choice of internal support and external independent support. The role of Safeguarding Officer will be central to the delivery of this recommendation.

Recommendation 15

The Leadership Team and Safeguarding Officer should continue to develop a culture in which there is a clear distinction between disclosure and gossiping and where disclosure is viewed and responded to effectively.

Recommendation 16

Trustees, Leadership Team and the Safeguarding Officer should develop a mutual and effective working partnership with the Diocese to improve safeguarding practice and partnership working. There may need to be some mediation for this relationship to be fully restored.

Recommendation 17

The Leadership Team and Safeguarding Officer should ensure that all safeguarding matters are directed to the Diocesan Safeguarding Advisor in a timely manner and in adherence to House of Bishops guidance.

Recommendation 18

The Safeguarding Team should ensure that confidentiality boundaries are respected in any safeguarding concern and that information sharing agreements and other protocols are in place to support this (see also recommendation 22 below).

Recommendation 19

The Safeguarding Team should continue to develop a safeguarding culture by implicit and explicit positive messages about the importance of safeguarding and its place in the ministry of ECW.

Recommendation 20

Trustees and Leadership Team (including Parish Safeguarding Officer) should continue to monitor safeguarding practice and attitudes towards safeguarding within ECW.

Recommendation 21

Trustees and Leadership Team (including Parish Safeguarding Officer) should ensure there is a clear pathway for safeguarding concerns to be raised external to ECW. This should be effectively communicated regularly at all levels of ECW.

Recommendation 22

The Trustees and Leadership Team should develop a formal process of commissioning where external advice is sought. This should be the same process regardless of whether there is financial cost or no financial cost. This process should include a formal information sharing agreement (ISA). Where information is being shared, even on a non-

identifying basis, the person whose information is being shared should be informed what information will be shared and with whom in line with the ISA, for the purpose of seeking advice.

Recommendation 23

In order to demonstrate adherence to best practice principles underpinning current data protection legislation, thirtyone:eight have requested that ECW make direct written contact with all individuals whose personal and sensitive information has been shared, albeit only in a pseudonymised form, ahead of the Review publication. This recommendation was made out of concern that those whose information had been shared should not read this for the first time in a public Review.

ECW have informed the chair of the IAG that they have fulfilled this recommendation.

Recommendation 24

If there is a continuation of lodging arrangements, it is recommended that there is a formal process and support policy for those who lodge. This should include risk assessment where there is known risk.

Recommendation 25

It is important that clear safeguarding messages are given from the front and that all members of the congregation are clear who the Safeguarding Officer is, how to report a concern and that when a concern is raised it is taken seriously and treated with appropriate confidentiality.

- The Leadership Team and Safeguarding Officer should ensure that clear safeguarding messages as outlined above continue to be regularly communicated from the front.

Theme 4: Support for victims, survivors and others

ECW has made support available to victims of JF and this is now able to be accessed independent of ECW, through thirtyone:eight.

Recommendation 26

The Trustees and Leadership Team should ensure that finance for victims to access support is continued post the Review and accessible independently.

Recommendation 27

The Trustees, Leadership team and PSO should develop pastoral support for the whole congregation in moving forward as the Review has identified the impact of the disclosures on a wide spectrum of individuals.

Consideration should be given that some may wish to access support confidentially and independently of ECW. The process on how to access this should be well communicated (see recommendation 14).

Recommendation 28

The Leadership Team and Safeguarding Officer should ensure pastoral support is available to those in safeguarding positions in ECW.

Part 2: Opportunities for learning and improvement in organisations beyond ECW

Whilst recommendations 1–28 are directed specifically towards ECW, it is the opinion of the Reviewers that in order for wider accountability and responsibility to be demonstrated, the following recommendations (29-66) should be considered more widely in the CE constituency churches and networks as well as by ECW where relevant.

This Review has illustrated that ECW did not operate in isolation but was connected to a wider community. There are lessons and recommendations for the constituency in which ECW is positioned, for the CofE and for all churches and indeed some are relevant for other faith and non-faith-based organisations to consider. Concern has been raised about issues in the broader CE constituency of which ECW is part remaining unaddressed, and how the findings of this Review need to be reflected upon and actioned.

Wider responsibility should be felt and demonstrably shape future actions of individuals, organisations and networks. Whilst the focus of this report is upon ECW and its past Vicar JF, it is a matter of grave concern that any lack of wider responsibility and accountability being taken should hinder necessary change more widely.

In light of the inter-connectedness of the churches and networks in the CE Constituency this will ensure any learning and improvement is implemented to the maximum potential both within ECW and within the wider network.

There is an urgent need for individual and collective repentance demonstrated by a clear pursuit of learning and change. Repentance would include all those who have been responsible for harm, or complicit in it (either through acts of commission or omission) being able to clearly articulate where they have wronged others and what they intend to do in order to begin reparations.

It is also worth noting that other Reviews, for example The Crowded House Review⁵ have made comment on culture and learning which could add to the understanding and learning within this Review. Other Reviews are ongoing e.g. the Makin Review (into the activities of John Smyth) and learning from all of these may helpfully be collated following publication of all, to demonstrate shared areas of concern, failings and good practice in addition to recommendations.

Theme 5: Developing safer cultures

There are many issues related to safer cultures throughout the Review. Christian organisations are especially encouraged to reflect on the importance of safer cultures and consider the implications for their own settings.

Recommendation 29

Constituencies and organisations must ensure that victims and survivors are always prioritised above protecting alleged perpetrators or the reputation or influence of the Church, organisation or constituency.

Theme 6: Leadership

Placing leaders on pedestals and enabling them to develop ‘celebrity status’ is unhealthy and can lead to unsafe practice. The status of leaders can be enhanced when they lead across a constituency.

⁵ <https://thirtyoneight.org/get-help/independent-reviews/crowded-house-review/>

Recommendation 30

Those organisations that provide ministry training should consider developing reflective practice in ministry around power, positioning and influence in their local context and across contexts in which they minister and allow external scrutiny of leadership.

Recommendation 31

The CE Constituency must reflect on their positioning of leaders including the power and influence associated with this; how diverse and inclusive their leadership teams and platform speakers are and any ways in which they may be perpetuating privilege and status. Inviting external scrutiny should be part of this process.

Recommendation 32

Leaders should be reflective of their use of power and the inherent power their leadership role provides.

- Those organisations who provide ministry training should ensure that reflective practice around use of power and the inherent power that the role of leadership provides is included in all ministry training programmes.
- Faith organisations should consider how they promote reflective practice around use of power within their leaders and consider introducing this to job descriptions and training needs assessment.

Recommendation 33

All faith-based organisations should review their accountability structures to ensure that there is a clear line of accountability for all who hold leadership positions including external accountability. External accountability can take the form of diocesan arrangements, denominational arrangements or where organisations are independent through local networks or with other faith-based organisations.

Recommendation 34

All faith-based organisations should review the support and supervision mechanisms available for leaders at all levels including during ministry training.

Recommendation 35

Organisations should ensure they have accountability, governance and support mechanisms in place for their leaders.

Recommendation 36

Faith-based organisations should encourage all leaders to engage in continual professional development and leadership training, especially from outside of their local constituency or context and record engagement.

Recommendation 37

Leadership teams should ensure that their organisation promotes inclusion and diversity at every level of their organisation. Thought should be given to how all groups (gender, ethnicity, social status as examples) within their organisation are represented, how their voice is heard and how this is responded to.

Theme 7: Safeguarding and safer cultures

There is some evidence in the Review of negative discourses and messages around safeguarding which act against effective practice.

Recommendation 38

All faith-based organisations should ensure safeguarding is promoted as an integral part of mission and ministry and that positive discourses around safeguarding are shared explicitly and implicitly - this is essential as policies and procedures without a shared understanding and commitment to safeguarding will not work effectively.

Recommendation 39

Constituencies and organisations must reflect on their own commitment to safeguarding, ensuring there is a clear commitment at all levels of leadership and invite external scrutiny and accountability as a model of good practice. Action should be taken to improve commitment to safeguarding where necessary.

Recommendation 40

All faith-based organisations should ensure there is regular teaching on healthy cultures and bullying, manipulation, coercive control and spiritual abuse as part of developing safer cultures. This is to raise awareness of harmful behaviours and their impact and to explore best practice for response in order to create a culture in which these behaviours are more likely to be recognised and responded to effectively in the future.

Recommendation 41

All faith-based organisations should develop an understanding of the characteristics of safer/healthier cultures. This will enable organisations to build these more effectively for the future. Safer cultures are important in addressing areas which may fall outside of statutory categories but can cause harm.

Recommendation 42

All churches and faith-based organisations should ensure there are clearly signposted safe pathways for individuals to raise concerns both internally and externally.

Recommendation 43

Faith-based organisations must ensure all positions appointed to, follow safer recruitment practices.

Recommendation 44

Faith-based organisations need to ensure that safeguarding is prioritised and that theological positioning cannot hamper or minimise safeguarding. This will require an intentionality to regularly monitor and ensure regular messages are given throughout the organisation.

Recommendation 45

Leadership teams and their governance structures should ensure there is awareness at all levels of their organisation that separation can be created through disagreement over theological positioning. Where this occurs communities and constituencies can feel marginalised and attacked. This can work against partnerships and process that are essential for good response to disclosures of abuse. It is essential that thought is given as to how communities holding different theological positions can work more effectively together to ensure that safeguarding concerns are not minimised or ignored and are responded to effectively.

Theme 8: Churches operating independently

Some churches operating under denominational banners are effectively operating independently and in effect being allowed to do so. This can impact on scrutiny, governance, accountability and safeguarding.

Recommendation 46

All dioceses, denominations and organisations responsible for oversight and scrutiny, should highlight where churches and organisations within their oversight, are attempting to operate independently (i.e. without appropriate accountability). A clear plan should be developed with each organisation to ensure accountability and oversight is effective. The use of mediation should be considered where there is relationship breakdown.

Recommendation 47

Churches operating with a degree of independence from recognised structures must maintain effective relationships with their denomination or diocese and ensure adherence to governance, accountability and safeguarding structures and protocols. We consider that the denomination has both an element of vicarious responsibility and a duty of care towards those operating under its banner and should act if churches continue to attempt to operate independently or do not comply to governance, accountability and safeguarding policy and practice.

Theme 9: Protocols to help churches and organisations manage such cases

Safeguarding policies and practice guidance provide information for reporting and referral. However, cases involving people with significant public profiles or who have been involved in multiple incidences of abuse are likely to obtain national coverage.

Recommendation 48

All faith-based organisations should review guidance around the management of serious, complex and high-profile cases. This guidance should enable churches and other organisations to be aware of and action all the aspects of high-profile cases that they need to consider. It should include when and how to seek specialised external support.

Theme 10: Accountability in personal work

In many ways relational work is the foundation of Christian discipleship but this case illustrates the necessity for robust oversight and accountability in such work, so that it cannot be misused to recruit, 'groom' or harm individuals.

Recommendation 49

Any organisation in which personal work occurs must have clear policies, procedures and guidance to ensure that this is conducted safely and to avoid dependent and unhealthy relationships being able to be established.

Theme 11: Understanding vulnerability

This Review demonstrates that current understandings of safeguarding primarily are seen to relate to children, young people and adults 'at risk of harm' (often still referred to in faith contexts as vulnerable). Where adults do not meet the criteria for being at risk of harm, they can experience damaging behaviours that do not cross into a statutory category of harm and in this context can render them vulnerable. There is a need for this current void

to be addressed. There has rightly been recognition that in cases of domestic violence, experiences of coercive control are categorised as abusive and constitute a legal offence. However, this does not currently apply outside of the intimate partner or family context.

We also consider that the issue of consent requires further legislative scrutiny in contexts where there is a significant imbalance of power and/or status and/or age including in a religious context.

Recommendation 50

All those involved in developing safeguarding policy and practice should reflect upon understandings of vulnerability to consider relationships and contexts in which coercive behaviour may render someone vulnerable and at risk of harm or abuse.

Recommendation 51

The issue of consent should be subject to further legislative scrutiny in contexts where there is a large imbalance of power and/or status and/or age including in a religious context.

Theme 12: Iwerne camps

The role of Iwerne camps and the interconnection with ECW has been made by many throughout the interviews. There are two current Reviews taking place that will examine the culture of Iwerne further.

Recommendation 52

It is a recommendation of the Reviewers that all involved and previously involved in Iwerne consider the abuse and harm that has occurred to former members of Iwerne. This consideration should include any masking or deliberate cover up of harm and the impact and further harm caused by this. This should include a review of those in senior leadership positions.

Theme 13: Relationship between diocese and parish churches

The vital role of the relationship between parish church and diocese in providing external accountability and a source of external safeguarding advice has been highlighted throughout this Review. Where this relationship breaks down this leads to a significant weakening of the safeguarding structure within the CofE.

Recommendation 53

The CofE needs to consider the process for highlighting where these relationships have broken down and in response, a system for provision of mediation to restore good working relationships.

Recommendation 54

Denominations where such partnership and relationships are similarly integral to effective safeguarding need to undertake similar consideration within their organisation's context.

Recommendation 55

Wherever there are Provincial Episcopal Visitors (PEV) arrangements in place the Diocesan Bishop should review arrangements and ensure that there is clarity in writing as to the roles and responsibilities of the PEV and the roles and responsibilities of the Diocesan Bishop.

Theme 14: The National Safeguarding Team

Throughout the review it has been clear that some working relationships have not always been as effective as they could have been, and systems and structures have not always helped to reach clear and consistent conclusions. In the case of the NST, it has been particularly challenging to understand the rationale upon which some key decisions have been made. A lack of effective and accessible record keeping has hindered reaching clarity in this regard.

Recommendation 56

There is urgent need for a formal case management system in the NST and to ensure that the criteria for what constitutes an NST case is clearly understood by all involved in decision making and consistently implemented. All decisions should be recorded, and records kept.

Recommendation 57

Victims need a streamlined, responsive, victim-focused system within the CofE. The current layers of parish, diocesan and NST create a complexity which is extremely difficult to navigate and works against effective response. There needs to be a clearer delineation of responsibility for the management of cases.

Wherever responsibility lies for case management there should be a single point of contact for this and liaison with those involved in the case and the victim. Every effort should be made to ensure consistency in the single point of contact. Consideration should be given to an offer of external independent advocacy for victims. This must be addressed urgently.

The CofE should review the current safeguarding structures to ensure there is a streamlined, responsive, victim-focused system within this structure in line with the above paragraph which includes minutes records of how and why decisions were made. These records should be stored securely so they can be provided for victims and review processes.

Theme 15: Independent, external oversight

The Review illustrated the complexity of addressing safeguarding concerns from within and how this could act against disclosure, especially in a situation where the individual is highly influential and the level of interconnectedness results in a feeling of a lack of safety in disclosing within the church, denomination or constituency. It also illustrated the call for independent investigation of disclosures.

Recommendation 58

Given the difficulties this Review has identified, strong consideration should be given to the establishment of an external, independent body where individuals could disclose confidentially. This could provide victims with a safe space and enhance the likelihood of early disclosure, effective response and therefore facilitate early intervention. This could support recovery but also prevent further harm to others.

Recommendation 59

Ministerial training organisations should ensure that those in ministerial training have a clear referral pathway to raise concerns external to their training institution.

Theme 16: PTO removal

This is a complex area, but this Review illustrates that the removal of Permission to Officiate (PTO) presents complexities. This can result in a situation where people may be uninformed, potentially placed at risk and vicars and PSOs being unable to manage that risk.

Permission to Officiate means an ordained minister may officiate at CofE services. In order to officiate the Diocesan Bishop must give Permission to Officiate within their Diocese. The permission can be removed which makes it unlawful for the ordained minister to officiate at any CofE service.

As a related, but distinctly different process, deposition means removal of the right to the exercise of ministry in all of the Holy Orders to which a person is ordained, and “depose” has a similar meaning. This represents a wider definition of ministry.

Recommendation 60

The CofE to consider what information is shared following the removal of PTO, who this information is shared with, how to respond to non-compliance to restrictions, and the fact that responsibility is currently placed on a vicar to refuse permission to minister. The Independent Inquiry into Child Sexual Abuse (Anglican Investigation) recommended that in addition to removal of PTO, the CofE should reintroduce the power to depose from Holy Orders where a member of the clergy is found guilty of child sexual abuse offences. The Reviewers recommend that this is extended further to include any found guilty of abuse and harm of adults or children and young people.

- a) The CofE should review processes for removal of PTO and the information sharing processes associated with the removal of PTO. Where PTO has been removed on safeguarding grounds, the bishop should inform all their parish safeguarding officers and vicars of the removal of PTO and the reasons for this. Where this affects a wider constituency the wider communication of this needs to be planned carefully and should be proportionate.
- b) Further reflection should be given, as PTO only applies to licenced ministry, to safeguards against individuals continuing to minister in external settings without restriction and therefore having influence and access to people, which could pose a risk.

Recommendation 61

There are significant and ongoing safeguarding concerns around JF’s relationships and any mentoring or ministerial activities. The Reviewers recognise that PTO has been removed but there is a need for clarity that the significant and ongoing safeguarding concerns relate to all aspects of Christian influence and ministry, including (but not limited to) personal work, pastoral care and mentoring.

The Diocese of Southwark and the CE constituency should ensure that there is this clarity in all churches where these relationships exist. In adherence to current House of Bishops’ guidance, arrangements should continue for there to be a safeguarding agreement at any church where JF attends in line with risk assessments undertaken. We would strongly recommend that any ministry, such as personal work, pastoral care and mentoring that JF may wish to participate in should be fully risk assessed to determine suitability and risk and be included within any safeguarding agreement.

Theme 17: Homogeneity

The Review illustrated that one of the biggest difficulties in identifying and disclosing the behaviours was the myth of homogeneity. The Review evidenced that a person who possesses positive characteristics and is widely highly-regarded could nonetheless display entirely inappropriate, abusive and harmful behaviours which render them 'unfit for their office'.

Furthermore, those who wish to disclose abuse or harmful behaviours can be caused to question their experience and reality where the predominant narrative outlines the positive traits of an individual. When this is combined with a narrative of protecting the gospel above all else then this becomes a powerful barrier to disclosing abuse or harmful behaviour.

Recommendation 62

All faith-based organisations should ensure safeguarding training includes a discussion of our views of homogeneity, debunking this myth and how these can act against identification and response to abuse.

Theme 18: Role of media and social media

The role of the media and social media in the coverage of the JF case has been seen positively by some as a means of breaking the story but also has had clearly damaging impacts on many. The Reviewers recognise that there has been a discourse around social media being an ungodly means of communication.

Recommendation 63

All media organisations need to consider how and when they break stories of abuse, harm or trauma and the support identified within these for those who have been impacted.

Recommendation 64

Social media providers should review arrangements for support of users where there is disclosure of abuse on their platforms. This should include how disclosures are shared and the impact of this, especially the unexpected nature of finding stories on social media and those affected feeling unprepared and therefore unable to manage the impact. Social media providers should consider arrangements for ensuring users are aware of support organisations within their country.

Recommendation 65

Where individuals are using social media to talk about their experiences, care and consideration should be given in expressing perspectives as being shared by all victims, members etc.

Recommendation 66

All faith-based organisations need to consider the messages that they give around the use of social media in a similar way that we would around the difference between disclosure and gossip.

Section A: Background and History

This independent Lessons Learned Review was commissioned by Emmanuel Church Wimbledon (ECW) in response to the growing number of concerns and allegations being made in relation to its previous Vicar Jonathan Fletcher (JF) and the prevailing culture within the church.

Insofar as the commissioning process of this Review is concerned, ECW state that they became aware in 2017 that individuals had made allegations of a safeguarding nature against JF, who was the Vicar of ECW from 1982 until his retirement in 2012. At this time (i.e. in 2017) a safeguarding report was made to the Diocese.

ECW confirmed in a statement on the 'Walking With' website that, "As soon as concerns about JF's behaviour were brought to the attention of the Diocese of Southwark, the statutory authorities, including the police, were informed. He was asked, and agreed, to withdraw from all aspects of his ministry exercised under his Permission to Officiate (PTO) which means he was no longer able to minister in the Church of England." Given the concerns, the Bishop of Southwark had concluded that JF could no longer hold Permission to Officiate within the Diocese of Southwark.

Since late September 2018, ECW has reported that they received further safeguarding disclosures regarding JF, which were all subsequently reported to the Diocese of Southwark. The Diocese has stated that they reported all disclosures to the relevant Police force (not the Metropolitan Police), who at that time concluded that no further action was to be taken in respect of JF. In July 2019, the Diocese of Southwark informed the Metropolitan Police about this matter. At the time of publication of this report, the Metropolitan Police are considering this further.

ECW formally approached thirtyone:eight in September 2019, following advice from the Charity Commission, to undertake a review of its safeguarding policies, procedures and safeguarding culture. Following significant discussions about the most robust response to this request, ECW committed to undertake a Lessons Learned Review. Based upon their expertise in this area, thirtyone:eight were asked to consider undertaking this.

A1. Commissioning the Review

This independent Review has been commissioned by ECW. In part, this was as a direct response to written, stated expectations of the Charity Commission following ECW reporting to them the concerns relating to the allegations made against JF:

"We would strongly encourage the charity to review its policies and procedures in the light of this incident and reflect on what lessons can be learnt, to reduce the risk of any similar misconduct going undetected in the future."

The initial approach to thirtyone:eight came via an email that was sent to Justin Humphreys (Chief Executive, Safeguarding) by Sarah Hall (Women's Worker and Safeguarding Lead at ECW) on 5th August 2019. In this communication it was expressed that ECW were looking for assistance with next steps in their efforts to respond to the reported allegations made against JF.

An initial meeting was organised between Sarah Hall and Justin Humphreys, which took place at the thirtyone:eight offices on 13th August 2019. Subsequent discussions followed, from which an outline scope of an independent Lessons Learned Review and appointment of the Lead Reviewer were agreed between thirtyone:eight and the Commissioning Group. The Commissioning Group consisted of Sarah Hall (Parish

Safeguarding Officer and Women's Worker) and Christopher Berkeley (Church Warden/Trustee). See below for further details about the setting of the outline scope.

The appointment of the Reviewers follows a standard process of identifying a match in expertise, skills and availability (in addition to other factors, such as geography and workload capacity) from amongst the thirtyone:eight team. In this case, Dr Lisa Oakley who acts as an Associate on commissioned assignments, was identified as the Lead Reviewer in consultation with the Commissioning Group. This was based upon her expertise and writings in relationship to the key areas of concern expressed by ECW and included within the outline scope. Simon Plant was assigned to work alongside Dr Oakley based on his expertise in similar areas of work and to ensure a gender balance within the core Reviewers.

At the same time, ECW asked thirtyone:eight whether they would be prepared to independently manage and administer a support fund, which had previously been established by ECW, to which an 'in principle' agreement was given pending further discussions and agreements. Alongside the support fund, a dedicated helpline was also in place for any person to make contact to discuss any concerns relating to JF and ECW, which was funded by the Diocese of Southwark. This was managed separately by thirtyone:eight to ensure related calls were taken by safeguarding team members separate to the Reviewers to prevent any conflict or confusion.

The proposal for thirtyone:eight to undertake this Review was first publicly announced at the ReNew Conference held on 16th and 17th September 2019 in a statement made by William Taylor (Rector at St. Helen's Bishopsgate and leader of ReNew). See appendix 4 for the relevant extract from that address.

The terms of reference for undertaking the Review were agreed and finalised over a period of weeks, during which time thirtyone:eight were clear about the need to await the outcome of the Core Group meeting convened by the National Safeguarding Team (NST) and to be held on Wednesday 2nd October 2019. Any Review to be undertaken by thirtyone:eight would need to be guided by any action that may be taken by the NST in order to avoid duplication or confusion about boundaries between any Review to be completed by either party.

Following the NST Core Group, ECW proceeded to formally invite thirtyone:eight to draft an initial scope for a Review, with a timeline and estimated costs. This was to be provided to ECW by the end of October 2019 for contracts to be agreed. This was in fact completed and provided to ECW on 24th October 2019. During the course of November 2019, a number of exchanges regarding the detail of the contract took place, following which final agreement was reached and a public statement concerning the Review made on 4th December 2019.

A2. Setting of scope

The scoping for the Lessons Learned Review was a two-stage process.

An initial scope was drafted following discussions between the Commissioning Group. Justin Humphreys (Joint Chief Executive; thirtyone:eight) and Karen Eakins (Head of Consultancy and Engagement; thirtyone:eight) compiled this in conjunction with Sarah Hall (Safeguarding Officer and Women's Worker; ECW) as a lead representative of the Commissioning Group for ECW.

The original scope was detailed and agreed via signed approval on 4th December 2019. The detail of this is outlined below.

The aim of the Review is to ascertain the following:

- As far as is possible, a comprehensive picture of Jonathan Fletcher (JF)'s activities in relation to the alleged harm caused to individuals, whilst serving as Vicar at ECW (during the period 1982 – 2012).
- Were any of the abusive incidences known to anyone at ECW prior to the period immediately leading to the withdrawal of PTO by the Bishop of Southwark in 2017.
- Why it took such a long period of time for the abuse allegations to come to light.
- To what extent the cultural context at ECW provided an environment for such abuse to occur and to not be disclosed, and what factors contributed to this.
- To what extent the policy, procedure and process for reporting abuse prevented earlier disclosure, and/or earlier action, taking into account how safeguarding policy evolved over the relevant years.
- Whether the ECW response to the disclosures and allegations was adequate and protective.
- What additional steps have already been taken to improve ECW's processes, culture, etc to mitigate any risk of repetition of such events or similar.
- In keeping with Charity Commission requirements, what lessons need to be learned by ECW, and what measures still need to be implemented to help prevent such abusive incidences from re-occurring, and how are these supported by current policies and procedures.
- What opportunities there are for wider learning for organisations beyond ECW.

A3. The Independent Advisory Group (IAG)

As part of the methodology for the Review, thirtyone:eight suggested that there should be an Independent Advisory Group (IAG) established to ensure that further external expertise could guide the Review, enhance independence and provide a critical opportunity for survivor engagement in the process. When the Lessons Learned Review was launched, an invitation was made for expressions of interest to join the IAG. A link to the details of this role was created on both the thirtyone:eight and ECW websites, with the following wording:

“The Review process will be entirely independent, and measures are being put in place to achieve this, including the establishment of an IAG. The group will consist of up to six individuals, with a representation of victims/survivors. Thirtyone:eight invite any individuals interested in participating in the IAG to express their interest by 20th December. Further details are available here [weblink no longer live]. The names of IAG participants will be kept confidential, and will not be known by ECW until the publication of the report. The group will oversee the work of the Review and will be chaired by Justin Humphreys (Chief Executive, Safeguarding at thirtyone:eight).

The Review itself will be led by Dr Lisa Oakley. Once the IAG is formed, its first task will be to review, shape and finalise the detailed scope with the Reviewers, ensuring that all legitimate perspectives and appropriate lines of enquiry have been considered. The IAG will then meet at agreed intervals throughout the process of the Review, with the overall purpose of guiding its work, acting as a point of reference and scrutiny, and ensuring complete independence”.

Following receipt of a significant number of expressions of interest, a shortlisting process was undertaken by the Chair and Vice-chair of the (IAG). The following initial guide was used to select the members:

- Survivor representation.
- Good cross-section of experience and understanding in terms of knowledge, professional experience, understanding of church structure and context, and a positive motivation to take on this role.
- Good balance of gender representation.

The membership of the IAG was agreed by the Chair and Vice Chair and includes:

- Justin Humphreys (Joint CEO, thirtyone:eight - Chair)
- Karen Eakins (Head of Consultancy & Engagement, thirtyone:eight - Vice Chair)
- Jackie Mills (Executive Assistant to Justin Humphreys and Data Protection Officer - Minute-taker)
- Dan Leafe (External Member)
- Graham Shearer (External Member)
- Sarah Smart (External Member)
- Anonymous (External Member - Survivor Voice)⁶

A3.1. Purpose of the IAG

The purpose of the IAG was shared with those shortlisted as outlined below:

- Review and shape further the scope (terms of reference), to ensure all legitimate perspectives and appropriate lines of enquiry have been considered.
- To have sight of and help shape the public statement(s) pertaining to the Review issued by ECW and thirtyone:eight and any associated communications inviting wider participation to the undertaking of the Review.
- To meet with the Reviewers for updates to be shared on the progress of the Review.
- To quality assure the draft report prior to submission to the commissioners.

A3.1.1. Review of the initial scope

Following the establishment of the IAG, the scope was reviewed, to ensure sufficient attention had been given to the aspects of the Review under the parameters of the ECW charity.

This second stage process was included to ensure that the survivor's voice was articulated in the considerations of the scope, and a level of insight from IAG members, to ensure the scope had been considered broadly from those with wider insight and professional experience.

The second stage of the scoping process identified some key changes to the scope. These key changes included:

- The inclusion of the word, 'especially' when referring to 'As far as is possible, a comprehensive picture of JF's activities in relation to the alleged harm caused to

⁶ As a survivor of church-based abuse, the identity of this IAG member has been protected.

individuals, **especially** whilst serving as Vicar at ECW (during the period 1982 – 2012).’

Clarification on the use of ‘especially’: The intent behind this was to enable, where appropriate, the exploration of details, circumstances and alleged incidents that may not immediately appear within scope but that, in the considered view of the Reviewers, may still be relevant. The details also speak to wider context and assist in the formation of a comprehensive, evidential picture. It was to provide appropriate flexibility and autonomy for the Reviewers to conduct the most robust information gathering.

- The second key change was in relation to naming the forms of alleged abuse that may have taken place. The IAG felt it was important that they were able to name the potential forms of abuse that may have occurred to validate and articulate potential participants’ experiences. These were therefore subsequently listed as: (physical, emotional, spiritual, sexual or psychological).
- The final amendment to the initial scope was the incorporation of learning about the extent of continued influence JF was able to have on both the culture and the decision making following the completion of his incumbency period.

A.3.1.2. The final scope

The final agreed scope is detailed below, this wording was shared on the thirtyone:eight website and on the ‘walking with’ website:

The scope will provide the basis for thirtyone:eight to undertake a robust and comprehensive exploration of both good practice and failings in culture and safeguarding practice at Emmanuel Church Wimbledon (ECW), both past and present. The Review is intended to enable the voices of those impacted by the behaviour of Jonathan Fletcher to be expressed and heard alongside other contextual information and concerns from other legitimate sources. The aim of the Review is to ascertain the following:

1. As far as is possible, a comprehensive picture of Jonathan Fletcher’s activities in relation to the alleged harm caused to individuals, especially whilst serving as Vicar at ECW (during the period 1982 – 2012).
2. Were any of the abusive incidences (physical, emotional, spiritual, sexual or psychological) known to anyone at ECW prior to the period immediately leading to the withdrawal of Permission to Officiate (PTO) by the Bishop of Southwark in 2017.
3. Why it took such a long period of time for the abuse allegations to come to light.
4. To what extent the cultural context at ECW provided an environment for such abuse to occur and to not be disclosed, and what factors contributed to this.
5. To what extent Jonathan Fletcher was able to have a continued influence on the culture and decision making after his incumbency completed in 2012.
6. To what extent the policy, procedure and process for reporting abuse prevented earlier disclosure, and/or earlier action, taking into account how safeguarding policy evolved over the relevant years.
7. Whether the ECW response to the disclosures and allegations was adequate and protective.
8. What additional steps have already been taken to improve ECW’s processes, culture, etc to mitigate any risk of repetition of such events or similar.

9. In keeping with Charity Commission requirements, what lessons need to be learned by ECW, and what measures still need to be implemented to help prevent such abusive incidences from re-occurring, and how are these supported by current policies and procedures.
10. What opportunities there are for wider learning for organisations beyond ECW.

A3.1.3. Public statements and calls for participation

The Lessons Learned Review was launched on 5th December 2019. A webpage designated for the Review was established by thirtyone:eight with the same information being reflected on ECW's 'walking with' webpage.

This included an invitation for individuals to make contact. The following invitation was made:

"In the meantime anyone, including victims/survivors, who wishes to participate in the Review or who wishes to pass on information to thirtyone:eight can do so confidentially by emailing JFsafeguardingreview@thirtyoneeight.org or by using the 'contact us' link.

Thirtyone:eight and Emmanuel Church Wimbledon take data privacy and confidentiality very seriously. Identities of confirmed participants will be known only by the Reviewers and in some circumstances, the Chair/Vice Chair of the Independent Advisory Group. No victim/survivor identifiable details will be passed between Emmanuel Church and thirtyone:eight without prior consent from those individuals.

ECW prepared a press statement which was covered by the following media outlets: Premier, Church Times and the Telegraph.

An updated timeline scope, and final call for participation was published on 26th March 2020. This sought to encourage further participation prior to the completion of the fieldwork stage of the Review. A statement, "Lessons learnt review into Jonathan Fletcher continues despite coronavirus lockdown with a final call for evidence" was sent to: Church Times, Church of England newspaper, Premier Christian News, The Telegraph, and Christian Today.

An update was issued with the following wording:

"Dr Lisa Oakley and Mr Simon Plant have been appointed as the Reviewers by thirtyone:eight, who are making a final call for participants to make contact with information relevant to the scope of the Review. The Review will include a robust and comprehensive exploration of both good practice and failings in culture and safeguarding practice at ECW from 1982 to present and conclude with a single report for publication. It will enable the voices of those impacted by the behaviour of JF to be expressed, heard and considered alongside other contextual information and concerns from other relevant sources. The Review process is entirely independent.

If anyone who has not yet made contact, including victims/survivors, wishes to participate in the Review (even if simply passing relevant information to us) you can do so confidentially by emailing JFsafeguardingreview@thirtyoneeight.org".

This generated wider participation which has aided the information gathering stage of the Review.

A3.1.4. Progress reviews

The IAG has met periodically throughout the process of the Review. Members have offered assistance to thirtyone:eight and the Reviewers through constructive challenge and

critique and by bringing a diversity of perspectives to enhance clarity and objectivity. The IAG have met a total of 11 times, in order to fulfil its purpose. It will meet for a further, final time in addition following publication of the report for a debrief and to identify their own lessons learned regarding the process.

A3.1.5. Quality assurance

A critical role of the IAG is to contribute to the quality assurance process for the Review. Thirtyone:eight routinely operate a two-stage quality assurance process for all consultancy work undertaken. This typically involves the Head of Consultancy & Engagement (who is responsible for this area of the charity's work) and the Chief Executive (Safeguarding) who has overall responsibility for all safeguarding services provided by the charity. In relation to this Review, both the Head of Consultancy & Engagement and the Chief Executive (Safeguarding) are members of the IAG and have ultimate responsibility for the conducting of the Review and the assurance/approval of this report.

As part of this process, all members of the IAG have been a part of scrutinising the final report and ensuring it was able to appropriately address the scope.

A4. About thirtyone:eight

Our vision is a world where every child and adult can feel, and be, safe. Creating safer places is how we achieve that, and we do this together in partnership with a wide range of organisations and individuals. People are at the heart of everything we do because we're driven to protect vulnerable people. Together.

We will continue to:

- **Equip** society with the knowledge and skills to create safer environments for children and adults at risk.
- **Empower** society to respond appropriately to those who are vulnerable or have experienced abuse.
- **Encourage** society to stand against oppression and exploitation by informing legislation and striving to raise the standards in safeguarding practice.

Over the last 40 years that we've existed, we've seen some fundamental and positive changes in the safeguarding arena, particularly in the Christian community. From being a lone voice, we've seen many of the major church denominations now taking seriously their responsibility to safeguard those in their care. We've also seen some new and emerging issues arise, as organisations seek to tackle the challenges their communities face. Changes in legislation and governance have also meant the landscape of safeguarding has changed and greater political devolution has brought greater variances in guidance across the four nations of the UK. With an increase in awareness has come an increase in the need for our specialist advice and support.

A5. The Reviewers

Dr Lisa Oakley (Lead Reviewer)

Lisa Oakley is an Associate with thirtyone:eight and it is in this capacity that she has undertaken the Review. She is also an Associate Professor in Applied Psychology at the University of Chester, Chair of the National Working Group for Child Abuse linked to Faith or Belief and the Church of England's Task and Finish Group on Spiritual Abuse. Lisa has also recently chaired the learning review group for the past cases review for the United Reformed Church.

After gaining her Doctorate in 2009 for her thesis, 'Understanding the experience of Spiritual Abuse in the Christian Faith in the UK' she has conducted pioneering research in this area and co-authored a number of journal articles and two published books on this topic: 'Breaking the silence on spiritual abuse' (with Dr Kathryn Kinmond) and 'Escaping the maze of Spiritual Abuse: Creating healthy Christian cultures' (with Justin Humphreys).

Speaking nationally and internationally on these topics, Lisa has also conducted research into safeguarding vulnerable adults in the Christian faith context, child abuse linked to faith or belief and safeguarding children and young people in international Christian work. She has also written expert witness reports for court proceedings and undertaken professional safeguarding assessments.

Mr Simon Plant (Reviewer)

Simon Plant is employed as a Safeguarding Advisor with thirtyone:eight. In this capacity, he has undertaken a number of high-profile safeguarding audits and reviews within a range of denominations and organisations.

Previously, he has worked in a variety of roles in Local Government, primarily focused on the management of Local Safeguarding Children Boards and other multi-agency partnership working arrangements. These roles have included the co-ordination and delivery of training, quality assurance and performance management of safeguarding processes, and various project management, change management and development work.

Among other achievements, Simon has developed an integrated strategy for the delivery of Domestic Abuse Services, pioneered a holistic development toolkit and peer review process for Safeguarding in Schools and managed the regionalisation of four LSCB's to form the Mid and West Wales Safeguarding Children Board. As LSCB Manager, he has undertaken the Local Authority Designated Officer role, managing and quality assuring the process for the risk assessment and risk management of allegations of professional abuse.

Simon has delivered lectures at University of Wales Swansea, University of Wales Trinity St David's and Coleg Sir Gar to trainee teachers, trainee Social Workers and to Social Work Masters and Doctoral students. Simon has also written and delivered LSCB training on a variety of specialist subjects. He is a trained facilitator for Child Practice Reviews and has previously managed Serious Case Reviews.

Simon has a strong interest in spiritual abuse, developing healthy cultures, healthy leadership, responding well to spiritual abuse and the role of congregational voice in contributing to a safe and healthy organisation for all. He is co-founder and Director of Replenished; a charity providing support to those who have experienced spiritual abuse.

Section B: Lessons Learned Review - methodology and process

B1. What is a Lessons Learned Review?

The importance of capturing lessons learned from any process, project or initiative is reflected as good practice for organisations in terms of identifying and addressing failures and improving future performance. Lessons learned derive from information that reflects both positive and negative experiences. In general, they represent the organisation's commitment to excellence or best practice and the opportunity to learn from the actual experiences of others.

Lessons Learned Reviews are well-known as a mechanism for the ongoing review of projects within project management methodology, but have in recent times become more widely used in adapted form to address and learn lessons from often complex situations that exist in other areas (e.g. health and social care). In these contexts, such reviews can either be undertaken as internal processes or commissioned externally from independent experts in the field or discipline to ensure greater objectivity.

The purpose of an *Independent Lessons Learned Review* is to provide an external individual or organisation the opportunity to gather and analyse information from a range of sources in relation to an event or series of events in order to draw evidence-based conclusions and make recommendations. In this case, the manner in which this process is undertaken broadly follows a systems methodology (as described later in this report).

It is designed to capture the broadest and most relevant information to be presented in a way that facilitates learning and future improvement. Within such a process, there are likely to be both positives and negatives that must be considered in relative proportions.

In many instances, a Lessons Learned Review will be commissioned in response to an event or series of events that are considered to have had a negative outcome (for individuals and organisations) or where they have not performed as would be expected.

The aim of the Review in these circumstances is to assist in a comprehensive understanding of where problems occurred, the consequent impact of those problems and some clear recommendations about how such problems can be avoided in the future. Lessons Learned Reviews will deliberately focus upon what has happened (as far as can be reasonably ascertained), how and why rather than who (in specific or named terms) might be responsible for any perceived errors. In order to facilitate the richest source of information from all concerned to be gained and the most effective lessons to be learned, there will be a deliberate attempt through the conducting of the Review to avoid apportioning blame to specific individuals.

A Lessons Learned Review will necessarily be inductive and deductive in nature. All available evidence will be collated and considered by the Reviewers and further evidence will be sought throughout as gaps are identified. This is an iterative approach to evidence gathering and analysis, which includes a process of distillation and triangulation from which findings are made.

Such a process differs from that of an investigation as it begins with an acceptance of the existence of 'the problem' and seeks to understand it within a wider culture, context or system. It is not therefore tasked with seeking to identify the problem or making findings of fact as might be expected from an investigation. As such, participation of individuals in a Lessons Learned Review is voluntary and whilst the Reviewers may issue invitations to participate, they have no authority to compel individuals to participate.

B2. Systems methodology

The methodology adopted for this Lessons Learned Review largely followed a systems approach for case reviews⁷, which focuses on the interaction between an individual and the wider system or culture they are situated within. This approach was developed by SCIE as a response to previous serious case reviews, which predominantly focused on failings, which were then often repeated in subsequent cases.

The systems approach for case reviews allows for exploration of why and how behaviours develop and importantly requires reflection on both failings and good practice of individuals, cultures, and systems. This approach was appropriate for the Lessons Learned Review as it allowed an exploration of the scope, which focuses on behaviour but also the broader cultural context, systems, discourses, and ideologies in which this occurred. Further, it allows an exploration of both failures and examples of good practice. This approach is important to underpin detailed learning from the Review to prevent repeated failings in the future, whilst simultaneously identifying and perpetuating good practice and ensuring a fair and transparent process was conducted.

The systems approach has three broad areas of the process. These being preparation, data collection and organising and analysing data.

It is important to state at the outset that the entire Review process was designed by the Reviewers and scrutinised by the IAG and conducted independent of ECW.

B2.1. Preparation

In this stage of the process the Review was commissioned, the IAG was established and the Reviewers were appointed. These elements of the process have been documented in section A of the report.

Another stage of this area of the process is preparing participants. In this Review prospective participants that had come forward had contacted the Reviewers through the secure email inbox. A systematic process, designed by the Reviewers, was followed in reviewing all emails received. Every email was read in reference to the scope set for the Review. All individuals who had submitted information to the scope or whose experience was of clear relevance were invited to participate in the Review. In order to ensure a fair and transparent process, anyone with relevant information was contacted.

A number of participants emailed the inbox wishing to share positive experiences, and these were included in those who spoke to the Reviewers. Those whose information was not directly relevant were responded to, thanking them for contacting the Review but were informed that at this stage, they were not being asked to participate further. However, should they have other information that could be relevant, or should they wish to contact the Reviewers again, they were encouraged to email the secure email inbox. Where relevant, in response to information submitted, direction was provided as to how to refer information to appropriate sources or where to obtain support.

B2.2. Participation and process – data collection

B2.2.1. Initial response to potential participants

Each individual with information relevant to the Review was invited to share information with the Reviewers. Those who wished to consider participation were sent an information sheet, which provided an outline of the purpose and scope of the Review, options for

⁷ Systems review methodology has been developed in a range of different sectors. Within health and social care, SCIE have proposed a generally-accepted model, used here for reference:

<https://www.scie.org.uk/publications/guides/guide24/introduction/learning.asp>

participation (these included speaking to the Reviewers, answering written questions or providing a written submission), details of how information would be held, procedures for raising concerns and details of support agencies and organisations.

Due to COVID-19 it was not possible to hold in-person interviews with participants (with the exception of the first three which were conducted before COVID-19 restrictions were introduced). All potential participants were written to and informed of the new restrictions. Interviews were offered using Microsoft Teams, in order for participants to meet with Reviewers face-to-face (virtually), telephone interviews were also offered, and written questions and submissions were available as before.

Potential participants were also provided with consent forms. These ensured that the participants were able to determine consent for how their information would be recorded, whether they wished anonymised quotes to be included, how to withdraw their information (all participants were provided with a month to review their participation). Once individuals had read the information sheet, they could make an informed decision about whether to participate further in the Review.

The consent form also asked for permission to record the interview. All recorded interviews were stored on a secure stream which only the Reviewers had access to. Participants were asked not to discuss the questions with others, to ensure a fair and transparent process for all, irrespective of when they participated.

B2.2.2. Anonymity

The Reviewers carefully considered the issue of anonymity. The balance between protecting victims and those contributing to the Review, with the need for action was reviewed. A determining factor in the Review being anonymous and participants being given anonymity was the level of fear many of those who contacted the Reviewers expressed. It is difficult to articulate in a written report the fear some individuals demonstrated. Some required repeated reassurance about anonymity and the security of the process. Fears were discussed about repercussions and implications of participation. Some directly reported being encouraged not to participate or only to share absolutely necessary information. As will become clear through the report, there was fear about impact on future careers, personal relationships and standing. This was not solely linked to a fear of JF but of others of influence in the wider CE constituency of which ECW is part. The level of fear demonstrated was considered together with the status of this report as a Lessons Learned Review, not an investigation.

The Reviewers determined that in order to protect the welfare of those who were fearful to participate, it was essential that anonymity was provided. It could be argued that only those identifying as victims should have their anonymity protected. However, it was also clear that a dual status could be held as victims and perpetrator or contributor to the behaviour at the focus of the Review. A further factor was that the Reviewers were able to address all points of the scope set whilst maintaining anonymity for all participants. Therefore, all participants were enabled to participate anonymously to the Review and permission for anonymised quotes were requested prior to inclusion in this report.

However, where the Reviewers believe that actions do not meet the expectations of practice at the time or represent ongoing concerns, these will be raised with the Parish Safeguarding Officer and with the Diocesan Safeguarding Officer to ensure appropriate action is taken with the necessary external scrutiny and accountability.

It is important to be clear that the identity of participants was only held by the Reviewers and not shared with others including any members of the IAG.

The interview process started with brief introductions and an explanation of the process of the interview and a discussion of the consent form. All participants were asked if they wished to continue. The interview was then conducted, and notes were made by one interviewer. Participants were reminded of the opportunity to take breaks or to pause or stop the interview. Where any safeguarding concerns were raised, the Reviewers ensured that these had been appropriately responded to or provided information for referral.

Where participants became distressed in any interviews, the distress protocol was followed, and the Reviewers ensured that they asked the participant how they were feeling and if they felt comfortable and safe to end the interview. Follow up emails were also sent to some participants to check on their wellbeing post interview. Support agencies and organisations were also referred to on the information sheet.

B2.2.3. Further invitations to participate

When the interviews were complete with those who had contacted the secure email inbox, the Reviewers wrote a final call for participation to members of ECW, this was included in the electronic newsletter. The Reviewers also wrote a letter to all former and current role holders at ECW. Due to GDPR constraints the Reviewers could not obtain personal email addresses. Therefore, ECW sent a brief contact email (written by the Reviewers) to role holders and this contained an embedded link to a letter on the thirtyone:eight website inviting participation. Holding the letter on the thirtyone:eight website, ensured that ECW were not aware of how many individuals had downloaded the letter.

It is of note that a number who responded to these final calls stated that they were waiting to be contacted, although this was not the process agreed with ECW. Although there were challenges in relation to communication from ECW about the participation of role holders in the Review, the information provided by role holders allowed all areas of the scope to be addressed through the time period specified and beyond.

A further set of invitations to participate were sent to persons the Reviewers considered to be relevant to the Review between June 2020 and December 2020, on the basis of information provided to this point. This included letters to JF to invite him to be included in the Review process (for a full account of correspondence with JF related to his inclusion in the Review, please see section B.2.4) Whilst this Review has of course been necessitated by JF's inappropriate and harmful conduct, it was nonetheless considered an essential element of good practice that he be approached in this way.

The interview stage lasted from 6th March 2020 to Dec 2020. It is of note that the initial timeline for the Review was extended to allow participation from all who met the scope and wanted to participate and for follow up interviews to be offered on the basis of new information that was provided in the former interviews.

B2.2.4. Summary of participants

Details of how individuals participated in the Review are provided in Table 1 below:

Method of participation	Participant numbers	Further information
Participation by interview	64	These took place online via Teams, or by phone. 3 were conducted in March face to face prior to Coronavirus restrictions.

		Some of these participants also provided written information or submissions.
Participation by providing written responses to questions	10	
Participation by submitting written submissions including emails	24	
Total number of participants	98	

Table 1 – Details of participation methods

Anonymised details of participants roles and membership of ECW are provided in Table 2 below (A number of participants were in more than one category):

Participant role	Number of participants holding this role	Further information
Member of former member of ECW	59	The definition of member (used by the Reviewers) includes those who were regular attendees for at least a year.
Role holders in ECW	33	
Victims or those who had experienced the behaviours focused on in this report	27	It is important to note that some of those who experienced the behaviours stated this was consensual and not abusive and did not identify as victims.

Table 2 – Participant role descriptions

Participants included those who identified as victims of JF, those who experienced behaviours detailed in the scope but would not label themselves as victims, those who experienced the behaviours and discuss these as consensual, members and former members of ECW, role holders and former role holders at ECW, relevant members of the wider conservative evangelical community and those with safeguarding or other roles in the wider Church of England. Interviews ranged from 20 mins to 3 hours; on average they were about 2 hours.

As stated, this is a Lessons Learned Review and not an investigation. Participants could not be compelled to take part or to answer questions put to them in the interviews.

B2.3. Organising and analysing information

Following the completion of the interview, the recordings were accessed, and notes transcribed. All information provided orally and in written submission, including emails and formal documentation, was organised under each point of the scope and then collated to develop the report. This included the safeguarding audit detailed in section B.3. The information was then reviewed in relation to each point of the scope. As agreed, the Reviewers contacted all participants to gain consent for any direct quotes that they wanted to include in the main body of the report. This was to ensure participants were able to give informed consent. Some participants edited quotes for clarity or accuracy, but the meaning of the quote was not altered by these edits.

B2.3.1. Analysis

Following the above processes, all the interview transcripts were reviewed and analysed to the scope. The report was constructed on the basis of this analysis of the information gathered from the participants, and the documentary review. The analysis and write-up phase of the Review took place from July 2020 – Jan 2021 (some of the interviews were also held during this time period and the report amended and edited accordingly).

The Reviewers considered the balance of evidence provided. Further, they reflected on generic patterns, individual behaviour, cultural contexts, discourses and systems. They also sought to ensure they accurately reported failings identified and examples of good practice as appropriate to the systems approach for case studies.

The organising and analysing of information culminated in the recommendations presented in points 9 and 10 of the scope.

B2.4. Repeated attempts to include Jonathan Fletcher in the Review process

The Review focused on the behaviour of JF while he was a Vicar at ECW in addition to the culture of ECW and the broader cultural context. Therefore, in accordance with best practice, the Reviewers consistently offered the opportunity to JF to be included in appropriate aspects of the process. In total five letters inviting JF to be included were sent between May 2020 and December 2020. All letters were sent by recorded delivery and responded to by JF and therefore the Reviewers are clear that they were received.

In June 2020, the first letter was sent inviting JF to be included in the Review. This letter was accompanied by the scope of the Review and the information sheet about participation. The letter invited JF to be included via the same three methods offered to all other prospective participants. These were: online video interview, telephone interview or answering written questions. The letter made clear that JF was being given the opportunity to be included in the interests of fairness and transparency. The reply received was that JF would prefer to meet in person and he did not offer to provide information by any other method. In accordance with government guidance, the thirtyone:eight policy at this time was for no face-to-face meetings due to the pandemic. The Reviewers wrote again (the second letter) to JF explaining this and to reiterate the options possible for his involvement. A third letter was sent to confirm that even though lockdown was lifting, thirtyone:eight's policy of no face-to-face meetings remained. This letter reiterated the options for involvement.

In September 2020, thirtyone:eight began to consider the possibility of allowing face-to-face meetings in exceptional circumstances. At this time there was a discussion about the risks of travelling to hold a socially-distanced meeting to conduct the interview. However, during September the thirtyone:eight policy being applied to all work was further reviewed alongside government guidance. In order to ensure the welfare of the workforce, they

determined there could be no face-to-face meetings until January 2021 at the earliest. A fourth letter was then sent to again invite JF to participate by the means available to all who had contributed during the COVID-19 restrictions.

In November 2020, the fifth letter was sent offering a final opportunity for inclusion or to provide a written statement by the 1st of December. On the 8th of December 2020, beyond the deadline, a letter was received from JF offering minimal comment, however at no point has consent been received from JF to include any of the communications from him in the Review.

The Reviewers were committed to a fair and transparent process and JF's inclusion as part of this and made every effort to facilitate this within the COVID-19 restrictions. The Reviewers note that it is a matter of public record that JF has offered a public apology to those impacted by his behaviours and stated that they were totally consensual and non-sexual.

B3. Safeguarding Audit

In addition to the review of past events concerning JF and the leadership culture of ECW an audit of current safeguarding arrangements has been completed and informs section 8 of this report. The Safeguarding Audit has been compiled from many sources of information.

These include:

- Meeting with the Safeguarding Lead to ascertain the understanding and interpretation of safeguarding and the particular challenges this presents for ECW.
- An overview gained from reading relevant policies currently in place and from information on the website.
- Meeting with a variety of leadership, employees and volunteers ascertaining their understanding and interpretation of safeguarding in the varied and complex context of the work of ECW.
- Meeting with those who have experienced the behaviour of JF.
- Evidence of compliance with various aspects of the audit provided through a shared google drive.

The following interviews with staff, volunteers and participants of the Lessons Learned Review have informed the Safeguarding Audit section of this Review:

Video Call with:

- PSO for JF case management/Women's Worker
- Lead Safeguarding Officer
- Church Admin, Church Manager
- DBS Manager
- Chair of Trustees (Trustee with oversight of Safeguarding and HR)

This information has then been reviewed against thirtyone:eight's 10 safeguarding standards. The findings are outlined in Annex 1 and inform section 8 of this report.

Section C: Lessons Learned Review Findings

This section of the Review presents each aspect of the scope (which can be found at A.3.1.2), and addresses these with information gathered from the Review participants. Anonymised quotes are included with permission of participants to illustrate the findings these are in italics throughout the report.

C1. A comprehensive picture of Jonathan Fletcher's activities in relation to the alleged harm caused to individuals.

This section of the report outlines a comprehensive picture of JF's activities in relation to the alleged harm caused to individuals, especially whilst serving as Vicar at ECW (during the period 1982 – 2012). It should be noted that a variety of profoundly harmful behaviours were disclosed to the Reviewers and these are detailed below. It should also be noted that there were positive experiences of JF reported by some, which will be addressed later in this report. As this section of the scope, and indeed the focus of the Review as a whole is about alleged harm, these behaviours will form the focus of this section.

C1.1. Spiritual abuse/bullying

There was a wide recognition from among participants of the way that JF related to others as being a concern. Whilst it is true to say that there were a variety of perspectives on whether some of the behaviours were harmful and the degree of harm experienced, it should be made clear that a number of participants detailed manipulative, controlling or coercive behaviour and bullying and some used the term spiritual abuse⁸ to reflect their experiences. These behaviours have resulted in profound and, for some, ongoing harm.

"psychological domination, manipulation and bullying as a result of his being in a position of relational power over me."

Some participants recalled JF as being brusque or harsh. Others likened his behaviour to that of a public-school headmaster. The discourse of a benign dictator was commonly quoted and phrases such as 'just Jonathan' or 'Just Fletch' were sometimes used to reflect the suggestion that his behaviour was a quirk of his personality. However, throughout the interviews there were repeated references to harsh treatment, humiliation and fear. Fear will be explored further later, but this has been an overwhelming theme within this Review. Fear of JF and fear of his power and reach were clear from many as were fear of others still in positions of authority in the wider CE community. This required repeated reassurances of anonymity from the Reviewers for many individuals to feel able to share. The level of fear reported by some participants is related to the level of harm they experienced. This fear was detailed by others as continuing and working against people feeling able to speak out about experiences and speak to the Review directly.

"there are still people scared to talk to you – people don't feel able to speak to the Diocese and ECW."

The minimisation of harm was also evident in accounts where terms such as 'public school banter' served to excuse or diminish the impact of the behaviour on many participants. It

⁸ Spiritual abuse is not a statutory category of abuse and there is some debate around the terminology. The definition of spiritual abuse which has been used to inform this review is: 'spiritual abuse is a form of emotional and psychological abuse. It is characterised by a systematic pattern of coercive and controlling behaviour in a religious context. Spiritual abuse can have a deeply damaging impact on those who experience it. This may include manipulation and exploitation, enforced accountability, censorship of decision-making, requirements for secrecy and silence, coercion to conform, control through the use of sacred texts or teaching, requirement of obedience to the abuser, the suggestion that the abuser has a divine position, isolation as a means of punishment, superiority and elitism' (Oakley, 2018)

is important to note that some participants used these terms to reflect their own reality, rather than as a minimisation of harm. The reality for some participants was one of coercive, controlling and bullying behaviour in JF's interactions with them. Participants spoke of intimidation, being put under pressure and passive aggressive behaviour within these interactions. These interactions ranged from staff meetings, preaching groups, prayer meetings, Bible studies, lodging, letter writing and financial gifting, which are explored in the sub-sections below.

"His description of a "benign dictatorship" wasn't original to him but it sums up the clear line of command that he was in charge."

In the area of bullying and spiritual abuse it is not uncommon for there to be different experiences of the same individual and these do not negate the harm done to victims. The use of spiritual position, coercion and control within a religious context, the inner circle (which will be explored later), manipulation, the notion of God as complicit and positive spiritual rationales for controlling behaviour are commonly reported in experiences of spiritual abuse (Oakley & Humphreys, 2019; Oakley, Kinmond & Humphreys, 2018; Oakley & Kinmond, 2013). The resultant fear, distrust, self-doubt and sometimes shame are also common.

The Reviewers consider that the accounts of JF provided by participants demonstrate that he caused harm, bullying and in some cases spiritual abuse.

C1.2. Staff meetings and working at ECW

One context in which controlling and coercive behaviour was reported was in staff meetings; some of these were described by a number as 'traumatic'. Some of those that attended these meetings described fear, worry about not having the right answer, knowing you could be humiliated, being treated like a child and wondering who is going to be picked on today. JF's approach was described as robust and although he said he was open to 'challenge' during staff meetings, any staff member who did this could face being publicly corrected/rebuked.

Many participants describe feeling intimidated by him, partly due to status, but also demeanour. JF's nature has been described as manipulative, slowly emerging as a person who intimidates. Some, however, saw his brashness differently, liking it, and being made to feel included. JF was described as being good at quietly undermining a person.

In addition to negative experiences, participants spoke of a strong tendency to favour some people from a public-school background. Background could determine which roles you were given within ECW and how you were treated; some being accepted, favoured and commended, and others being ignored or treated negatively. Some described acquiescing to requests for service such as car cleaning and gardening to avoid being the focus of negative attention. This was mainly the case for role holders, ministry trainees etc.

"From my experience I do not think that the idea of church being a safe place would be discussed when Jonathan was Vicar. It was not a safe place for those who worked there – as those who were in the Emmanuel preaching groups might disclose – where people who were not up to the grade would be humiliated. Jonathan said that church was training camp rather than a hospital."

C1.3. Prayer meetings, preaching groups, Bible studies and weekends, and services

Many of the coercive and controlling behaviours reported to occur in the staff meetings were seen elsewhere in church life. The term spiritual abuse had been used by some participants to describe their experience.

The monthly prayer meetings were described by some as positive and helpful times and by others as coercive and manipulated public gatherings. Some recount a focus on keeping your prayers short in order to not be open to criticism; others recall JF's open exasperation if someone struggled to find the right words.

A number of participants spoke of a shame culture in Bible studies. This, in addition to the focus on 'sound, solid and orthodox' theology, for some, resulted in a pressure to get every answer right.

These behaviours were also spoken about in relation to preaching groups, staff meetings and Bible study weekends. However, many commented that the challenge that came could be given in a passive aggressive manner, making it difficult to recognise and call out as inappropriate.

"JF would stop the study and ridicule you but in a charming way – it was never overt or harsh, always wrapped in charm – a steel fist in a velvet glove- this made it worse so you couldn't challenge it because he was so charming."

C1.4. Letter writing

Jonathan was a prolific letter writer. Letter writing was commented upon as common practice in the Iwerne camps, which JF had a significant role within and this is evidenced in the camp leaders' handbook. In the right context letter writing can be profoundly helpful and demonstrate individual concern and care. However, in the letters shown to the Reviewers there was evidence of encouragement but also of clear manipulation. A number of people reported feeling anxious when receiving a letter for fear of the contents. Others recalled birthday cards with a supportive message but then a veiled criticism of their ministry.

"Correspondence is one of his chief tools for manipulation - ironically letter writing has been one of the things people have celebrated most in his ministry."

C1.5. Financial gifting

JF was very generous with money and a number of participants reported feeling very grateful and thankful for the financial support received and saw this positively. However, in some accounts, people were reflecting on the use of financial gifts, the nature of who these were given to and questioned this as a tool of manipulation, in that the gifts made them feel less likely to challenge behaviour.

"We would get quite big financial gifts once a year, it was much harder to say you are not happy, he was keeping us on side while not behaving very well."

C1.6. Personal relational work & harmful behaviours

A hallmark of JF's ministry was relational and personal work. He invested a large amount of time into mentoring relationships. This was a hallmark of ministry at Iwerne that JF continued in his ministry beyond Iwerne.

It is important to recognise here that taking part in these camps was significant for many and these took place during formative years for many young adults. JF was often described as a father figure, an uncle figure or a grandfather figure. Many of those who were harmed by JF's behaviours developed a spiritual relationship through the Iwerne

campus as young adults. The influence and integration of Iwerne and ECW will be explored further in this report. It is important to note that, for many participants, their relationship with JF began at Iwerne and this context is essential to understand how the behaviours detailed occurred and were either not disclosed or not responded to when disclosed.

Again, a number of participants discussed positively the impact of personal work on their own spiritual life and career development. Some, however, believed that the personal work provided an opportunity for JF to build close relationships with those around him, which would make it easier for him to later engage in other potentially harmful behaviours, a form of preparation for the future. It is important to note that this is contested by others in the interviews, for some there was a stance that this had not occurred. Others reflected that looking back they might now conceptualise these behaviours as a form of 'grooming' in the sense of preparing the way for future conduct.

Many discuss time spent in discussion, Bible study, playing squash or tennis and relationship building. Some accounts then discuss how questions asked in these settings, would become more personal and include the topic of masturbation; a number of participants recall being asked about masturbation.

For some this could then move on to the suggestion of naked massage or saunas. One participant described their experience which illustrates the total inappropriateness of this behaviour and the harm inflicted.

"When I was still in my teens, JF began to ask me about masturbation. On occasions, JF invited me to engage in massaging him when he was naked, and this made me feel very uncomfortable. JF appeared to consider the opportunity to massage him as a positive "reward". I found the "rewards" as distressing as some of the sanctions. I felt humiliated and degraded."

The process was not linear. For a number, the suggestions of naked massages and saunas came after playing sports. Then, for some, questions would be asked, or behaviours suggested and if individuals asked for them to stop or refused to take part in behaviours, there may be a few more times of asking but then this would stop.

"It was clearly part of the filtering or grooming process, whereby if something happens, he tries to take it on to the next stage; if not, he moves on to the next person."

A further element to be reflected upon is the notion of preparedness i.e. that things were in place so that a massage could occur, and the presence of these items again normalised the behaviour.

"I think he was prepared – always the same baby oil, cushions, heater in the study – so it didn't look unusual; it was something that was there all the time."

Although this concept of grooming is debated in the interviews, there is a pattern to be noted. There was a discussion, by some of an escalation of behaviours. Some of the participants noted a lack of father figures in their early adulthood and the importance of the establishment of relationships with a proxy father figure. Others discuss the preparedness for behaviours as noted in the quote above. All of these are reflective of the grooming process.

"The counsellor said this is classic control, for the first time I thought perhaps I am not totally responsible – he was the minister, relationship began when I was a child – he was a father figure and because of who he was, people thought I was fortunate to have his attention."

This does not mean that the motivation behind the behaviours was necessarily sexual or that we can establish that relationships were developed with the intent of escalation of

behaviours. However, it is clear that the establishment of relationships in formative years, and with someone of status, provided the basis for other behaviours to occur later in life.

"My family circumstances as a child and through adolescence were difficult at times. JF was aware of my circumstances and took me "under his wing." Over time he became my friend as well as a father figure. He had a very powerful influence upon me over many years and communicated his opinion of various details of my life and vocation as though he were communicating God's will. I would now describe JF's influence upon me as very controlling."

However, it should be noted that one victim reports that JF told him to perform a sexual act in front of him. When he did not, JF performed the act instead. This allegation has been referred to the statutory authorities. Hence it would not be appropriate to comment further.

This behaviour demonstrates a gross abuse of power and in the opinion of the reviewers is far beyond anything which can be deemed acceptable or appropriate from a minister in a position of power, trust and responsibility. Further, it raises a question regarding the possibility of whether this would be regarded as misconduct in a public office.

C1.7. Showers

A number of participants recall JF suggesting showers or that they were aware he had done this with others. As the showers were often after playing sport a number felt there was nothing amiss about this suggestion. Additionally, it was not outside the bounds of their experiences in public school or other schooling where men often showered together after sporting activities. Some recalled feeling uncomfortable, especially due to the age and status difference between themselves and JF and the fact that he and the participants were naked.

C1.8. Naked saunas

As with showers, a number of participants stated that taking saunas after sporting activity was not unusual. However, there were a number of reflections about feeling 'uncomfortable' or 'weird' in this activity being suggested by a minister, again recognising the power differential, and that being naked was not necessary or usual in this context.

C1.9. Naked massage

A number of participants recall being asked by JF about massages. Again, in a sporting context many were used to massage and therefore were not concerned about the suggestion or practice of massage. Some still reported this to be an activity by mutual consent. Some participants noted that the knowledge that others were engaging in massages normalised this behaviour.

"The massages were always consensual on my part; I knew that others were having them, and you could say this normalised this to me."

However, whilst some did not see naked massage as unusual, others were clear that being massaged whilst naked or by a minister who was naked, was not a normal activity.

C1.10. Sexual nature of massages

Some participants believe that there was a sexual motivation behind the massage behaviours. Others do not. One participant recalled one occasion where a massage was taking place, which became the last time he took part in massage with JF.

"Then I realised he had what I would call a bit of an old man's erection going on. Not a fully formed thing but it was obvious there was some arousal of some nature going on, I thought – this is weird – that was the last time".

C1.11. Forfeit behaviours

A small number of participants had been involved with what are termed 'forfeit behaviours'; these occurred within prayer triplets/quadruplets. These behaviours ranged from being hit on the naked bottom with a gym shoe, being given a cold bath, or being left outside in the cold while the rest of the prayer triplet/quadruplet were inside. Some participants who were outside the prayer triplet/quadruplet spoke of being threatened with being beaten with the gym shoe or suggestion of it as a response to sin.

These behaviours were deemed to be forfeits when a target was not met around a matter of personal sin, such as masturbation.

"At some point he suggested sanctions, any issue we tried to tackle at the time, punishment if don't. If we both failed, 6 blows with the gym shoe was the agreement".

"At points throughout our relationship, JF employed various sanctions in response to information I disclosed to him. These included being beaten with a gym shoe and taking cold baths".

It was learning about the forfeit behaviour that caused many individuals to change their opinions of JF and his ministry. JF's personality and responsibility for these behaviours was also reflected in the interviews.

"The smacking for me was the point that switch flicked using physical wounds to bring back godliness...It was theologically so wrong.....Jonathan was clued up enough to know this was theologically wrong ..."

C1.12. Impact

We were deeply saddened and concerned to find that some participants reported deep and lasting harm related to all the behaviours, and, for some, the need for therapy, medication and the contemplation of suicide.

"As a result, I manifest unhealthy and debilitating responses, including shame, low self-worth, anxiety and depression. I am currently on anti-depressants and receiving psychotherapy which I hope will help restore my mental health."

"These types of behaviour had a significant and detrimental effect on my emotional and psychological well-being, and I recall one beating which made me feel suicidal for some time afterwards."

The level of fear in talking to the Reviewers at all, and especially about the behaviours experienced, demonstrates the impact these have had. The interviews demonstrated confusion, self-doubt and guilt in some and the difficulty of processing these experiences. There can be no doubt that deep and profound harm has been experienced. For some they have put in boundaries and distance to protect themselves from further harm, but they report the lasting negative impact on different areas of their lives.

"In recent years, I have felt it necessary to distance myself from JF in order to protect myself and my family from his influence and control. I believe his controlling behaviour has had a profoundly negative effect on me, my marriage, my family and my ministry over several decades".

For those who experienced the bullying/ spiritually abusive behaviours, the lack of recognition generally of these as being harmful, and the minimisation of these experiences, has led to significant trauma and distress. Deep and profound harm has regrettably and clearly been experienced by some. What is also abundantly clear is that these behaviours are completely unacceptable from any individual, and especially from a church minister in a position of trust and status.

Whilst not attempting to in any way diminish the harm experienced by a significant number of participants, it should be noted that some participants expressed no negative impact from the behaviours.

It is the opinion of the Reviewers that these behaviours, represent a serious abuse of spiritual authority and position Church of England guidance on ministerial conduct provides clarity on the expected conduct of clergy⁹. The behaviours of JF also represent a significant and ongoing safeguarding risk for future ministry relationships and activities that JF participates in, whether deemed consensual or not.

C1.13. Additional learning on scope point one

C1.13.1. Impact of the media and social media

Many participants discussed the impact of the media and social media on them and this area is important to consider in terms of lessons learned. For some media coverage was the only way this story would be shared and broken, because the channels victims had tried to use before had not resulted in action and response.

"For some, the only way this came out was through the media. It was journalism that broke open the truth of what was happening".

For others, the media reports have been deeply damaging and an unexpected aspect of this. Some commenting that what was represented in the media does not reflect their own experiences of ECW or JF. Perhaps the biggest discussion was around the role of social media, with strong feelings expressed about trial by social media and only certain perspectives being shown. Also, some participants reflected the feeling of living in a world where denigrating people online is accepted and concerns that certain voices are controlling the narrative being told.

"When a friend emailed me the Telegraph articles, I was angry and upset with the newspaper's reporting that made judgments about such serious accusations, and further allegations, before a court trial of the eye-witness evidence had been met. I have never experienced anything except kindness and equal mutuality from Jonathan."

For others the inability to prepare for social media and media updates and tweets left them feeling unprepared and unable to cope with the impact of what they were reading.

"I am reasonably robust, but I am frightened at looking at that social media post today. I don't look at social media, it can completely affect my mood for many days. There is power in social media posts."

"People who have damaged me far more are those who have tweeted about it."

However, what was also noted was the importance of considering messages given out against the use of social media as a form of coercion and control. One participant commented that these in themselves represented for some a further form of control in seeking to frame the narrative told.

"The constituency has been groomed to hold a view of social media that is very unhelpful in dealing with abuse. Twitter in particular, but also Facebook, are labelled as sinful forms of communication, used by worldly people for gossip."

A further issue raised was that social media had been used to hold people to account in an environment which prizes letter writing, which is much less accountable.

⁹ <https://www.churchofengland.org/about/policy-and-thinking/guidelines-professional-conduct-clergy/guidelines-professional-conduct>

“Social media is accountable because people can correct one another and it’s public. Letter writing was the preferred mode of control as it was private, privileged and utterly unaccountable. It is deeply ironic to get a handwritten letter urging one to be careful on Twitter – a private unaccountable rebuke for engaging in public accountable speech!”

The participant noted the importance of social media for allowing individuals to connect and share their experiences and offer mutual support offline and encourage each other to engage with Reviews such as this.

“The truth is a lot of the victims never would have got in touch with each other if it wasn’t through people being willing to put stuff on Twitter. People need help to realise they were not the only one abused by Fletcher. After connecting via social media, they rally around each other, begin to talk, and eventually go to reviews.”

The topic of media and particularly social media was prevalent in people’s accounts. There is a clear tension between the harm some participants expressed by reading comments on social media and the silencing and isolation others felt at not being able to connect and tell their stories and being further silenced by messages about the sinfulness of engaging with social media in such cases. What is clear is that individuals need spaces to be able to disclose harm without judgement but that the complexities about the use of media and particularly social media must be considered in lessons learned.

Summary

This section of the scope focuses on harmful behaviour and demonstrates evidence of spiritual abuse, bullying, coercion and control, naked massages and saunas, forfeits including smacking with a gym shoe and ice baths. There is also a serious incident involving a sexual act performed in front of someone that has been reported. The impact of these behaviours on a number of individuals caused harm and many will live with this impact in the long term.

The Reviewers conclude that the behaviours are completely unacceptable for someone in a position of spiritual authority and constitute an abuse of spiritual authority and power, falling far short of the expectations, obligations and duties of those in Holy Orders. Further, they evidence significant and ongoing safeguarding risk around JF’s ministry relationships and any mentoring or other related activities. The Reviewers recognise that PTO has been removed but there is a need for clarity that the significant and ongoing safeguarding concerns relate to all aspects of Christian influence ministry including personal work, pastoral care and mentoring.

We state for the record that JF has never been charged with or found guilty of any offence.

C2. Were any of the abusive incidences (physical, emotional, spiritual, sexual or psychological) known to anyone at ECW prior to the period immediately leading to the withdrawal of PTO by the Bishop of Southwark in 2017?

The second point of the scope was to establish if any of the abusive incidences were known to anyone at ECW prior to the period immediately leading to the removal of PTO. This section will address this by examining the information from the interviews in relation to the different categories listed in this point of the scope.

Some staff and members of ECW reported that they didn’t know anything at all until the revelations became public and were upset by the assumption that everyone was aware. The ‘shock’ of the revelations for some members was evident in their interviews.

"...Really struggling with the thought that he is not who I thought he was and the suggestions that everyone knew and that's just not true – I want people to know that there are people really close to this situation that did not know. I guess I want people to know that."

One factor impacting this area of the scope is whether individuals perceived behaviours to be harmful or abusive; this is particularly pertinent in the area of spiritual abuse/ bullying behaviours. Others changed their perspectives on the behaviours over time and especially when further information about the physical aspects of the behaviour came to light.

Some participants have highlighted that they did raise concerns, (especially the spiritual abuse, bullying, coercion and control) before 2017 with those in leadership at ECW or that behaviours were witnessed and that these were minimised or not dealt with appropriately. Some role holders have also acknowledged that they did not deal effectively with JF's behaviour at times, but these comments were in relation to the spiritual abuse/bullying behaviours and many commented they were unaware of the other behaviours.

To fully answer this aspect of the scope it is useful to split the behaviours into 4 parts.

1. Spiritual, emotional and psychological.
2. Naked saunas and massages.
3. Forfeits and beatings.
4. Sexualised behaviour

C2.1. Spiritual, emotional and psychological abuse

The evidence from the interviews showed that spiritual abuse (term used by participants), psychological and emotional abuse, coercion and control, manipulation, selectiveness, separation and bullying was in plain sight. This has been demonstrated in point one of the scope in this report.

In the interviews, participants reported behaviours were witnessed and reported earlier than 2017 and that some members and role holders in ECW were well aware of them. Why these observations of behaviour and reports were not actioned can be explained through further information provided in the interviews. Firstly, as explained in the previous section, some saw these behaviours as akin to a public-school headmaster. For those who had been to public school there was nothing unusual in this method of behaving. For others, these behaviours were seen as a quirk of JF's personality, his eccentricity. That they were accepted because of the huge benefits people saw to JF's ministry. For others, the behaviours were described as deeply abusive and damaging but they did not speak out as they feared for their future employment prospects (this will be explored further in the next sections). However, for those who did speak out, the behaviours were often minimised or dismissed. Some individuals were left feeling that they were to blame, and in some cases, the expectation was that they needed to be more resilient.

It was made clear by some participants that there was a significant amount of spiritual abuse and bullying especially in staff meetings, prayer meetings and Bible studies and that this happened over many years. There were public behaviours that were also widely known. Some participants raised concerns about racism and xenophobia along with cruelty and humiliation from the pulpit. As these were public behaviours this must have been widely known. Again, the recognition of this being an issue is varied.

"I saw and experienced countless acts of intellectual bullying and arrogance, the belittling of other faiths and cultures, and a very odd sense of Jonathan being a vaguely infallible leader."

It was clearly known by some that ministry trainees and curates were struggling, especially in the context of the working relationship with JF and staff meetings. It has been recognised by a number of role holders that they did not respond as effectively as they should have, where complaints were raised, bullying behaviour was witnessed, or people were seen to be struggling. There is a clear remorse, regret, shame and guilt shown in some for not having taken the appropriate action here. This is linked to the failure to notice or perceive the seriousness of JFs conduct.

It is important that this lack of appropriate response is seen in the context of loyalty to training vicars, some being victims of JF's behaviour themselves, the culture of fear, coercion, control and manipulation and the lack of understanding of spiritual abuse at the time. Some participants spoke of other role holders who were not only aware of, but also perpetuated the behaviour. This went beyond not dealing with this appropriately to being part of the problem and the culture.

In addition to those who had raised concerns, a lot of people were personally questioning JF's behaviour and not raising it. The openness of this spiritually abusive behaviour was spoken about by a number of participants. There is a guilt about not having spoken out about this, but also a recognition that people were too victimised to stop it. It is important to note that the different perspectives of this behaviour still exist for many and there is a division about whether this was bullying, spiritual abuse or brusque behaviour. However, many who experienced it stated the depth of harm they felt and, for a number, continue to feel.

The evidence leads the Reviewers to be clear that behaviours including bullying/spiritual abuse, emotional and psychological abuse were known about (whatever terms were used to define it) and little or no action was taken to address this by role holders and leaders at ECW at the time.

C2.2. Naked saunas and massages

C2.2.1. Nakedness

There were a number of areas of behaviour involving nakedness that were recognised and discussed at the time this was occurring.

- Swimming naked with groups both on camps and holidays
- Being naked in the shower with others
- Being in changing rooms with others while naked

Some participants reported that these behaviours were fairly widely known and talked about both in ECW and the wider Iwerne network. This was often described as normal in a public school and sports context. This is explored further in section C.3 of this report.

C2.2.2. Naked saunas

The naked saunas were less well-known amongst participants than the spiritually abusive/bullying behaviours; though those that were involved with these activities were aware of others also having naked saunas with JF. One participant did describe how they had heard a conversation about naked saunas, which they were asked not to repeat as they shouldn't have heard it. This suggests that the rationale that the behaviours were seen as a 'normal part of sporting activities' is questionable, when the request for secrecy is then made. It can only be concluded that even if the activities were seen as normal behaviour, there was clear understanding that others would not share these perspectives.

C2.2.3. Naked massages

The naked massages were also less well-known and were reported to be more hidden and secret. The majority of participants reported not knowing that these behaviours were happening. Some participants spoke about rumours of massages but not being sure whether these were real. Some of those involved in these activities knew, but often felt they were the only person involved in these activities. Those involved had different perspectives on these behaviours. Some felt and still feel, this was normal and consensual, some felt that they were weird but could be explained by boarding school culture and others didn't realise at the time that there was anything wrong with the behaviour and have changed this view over time.

Others reported that they knew that naked massages were happening with others. JF would tell those involved with the naked massages that others had been involved with these. This in effect normalised the behaviours, made it more likely that people would take part and made it less likely that this behaviour would be reported. This is covered in greater detail in section C.4. Some participants felt that they were responsible for involvement in these activities.

"It has been made clear to me from others (after 2017) that JF "normalised" the behaviour by saying many people found it spiritually helpful or by dropping in the names of other people who participated."

It is worth noting here that it was reported in some interviews that when wives became aware of the naked massages, they often asked questions of their husbands and the practice usually stopped. Although they stopped, these were not reported or challenged, but most commonly the naked massages and situations where you could be asked were avoided and excuses made.

The issue of consent and how it might apply in these situations will be explored further in section C.3.8.

C2.3. Forfeits and beatings

The forfeits behaviour was known by far fewer people. Some participants stated that they had heard that the physical abuse, beatings and ice baths had been disclosed prior to 2012. There was some concern that these had not been listened to, but the participants were clear that this was second-hand information and could not be verified.

There were reports from some participants that someone had caught JF giving someone a cold bath. This incident was clearly before 2012 and therefore was known by some at ECW prior to the period immediately leading to the withdrawal of PTO by the Bishop of Southwark in 2017

"I was struck by someone catching Jonathan giving someone a cold bath and they said they giggled at the situation and it was resolved. It was his force of personality and laughter and he had the ability to push through"

Some of those involved in the forfeit behaviour were role holders. There was some suggestion that this could have led to an unwillingness to respond to concerns or behaviours that were observed.

"I have heard from quite a few people that they had approached members of the leadership at ECW, I think most people were pushing on the bullying side the hardest. I think the other behaviours, it sounds insane, but it was probably easier to complain about bullying than behaviour you yourself might have been involved in."

C2.4. Behaviour of a more sexual nature

As set out under C.1.6, two participants reported behaviour by JF of a more sexual nature, i.e the report by one victim that JF told him to perform a sexual act in front of him and when he did not, JF performed the act instead; and the report that JF was sexually aroused during a naked massage. We conclude that very few, if any, knew about these behaviours of a more sexualised nature prior to 2017. As we have said, a number of participants question whether behaviours such as the naked massages were sexually motivated.

C2.5. Allegations of cover up

There have been some allegations of a cover-up in relation to responses to concerns about JF's behaviours by some participants. There was a difference of opinion here with some stating that, whilst they could understand why people felt this, there was not a cover-up and that all actions were taken with the best of intentions. It was felt by some that assumptions of knowledge had been made.

C2.6. Deliberate concealing of allegations

In some interviews there was a suggestion that there was a concerted effort to manage the disclosures. In some interviews participants stated they felt there was a deliberate attempt to conceal. This was partly related to comments that more people perpetrated the behaviour than just JF, with some just recently realising their role in perpetration. There were reports of meetings to discuss how to manage the fall-out and the narrative. This included crafting of statements made about this case in public events, including in the wider CE constituency . There were also reports of some being told not to speak out as some victims were very vulnerable and speaking out would put them at risk.

Summary

On the balance of evidence, the Reviewers can only conclude that the spiritually abusive/bullying behaviours were in plain sight and some were reported to leadership within ECW prior to 2017. The massage and saunas were also not hidden behaviours. The forfeit behaviour was reported to include role holders but these reports are not from the individuals themselves. On the balance of evidence, at least some of these behaviours were known about prior to 2017 and there were opportunities for action to have taken place sooner.

In contrast, some were clearly shocked when the abusive behaviours were revealed and the Reviewers do not doubt that many were unaware of them. This is common in other cases of abuse, where it can be hidden in plain sight.

As regards the behaviour of a sexual nature, the evidence suggests very few, if any knew about this prior to 2017.

C3. Why it took such a long period of time for the abuse allegations to come to light.

The answer to this question is complex and multi-faceted and reviewed thematically in this section of the report.

Bullying and spiritually abusive behaviour have been explored in the previous two sections of this report as they directly related to those points of the scope.

The Reviewers are cognisant that some of the messages in this section are covered in other areas of the report. However, they are included here as they pertain to the issue of why allegations took a long time to come to light.

C3.1. The character and behaviour of JF

Many of the interviews included discussion of the positive impact that JF had on the lives of many in ECW and beyond. As stated in the methodology, a number of individuals contacted the Review to ensure that their experiences of positive aspects of JF's ministry and behaviour were recorded and reported in this Review. It may seem unusual in a section on reasons for a delay in disclosures to have sub-themes on the positive aspects of JF's behaviour. However, it is of relevance as it is one of the reasons for delayed disclosures. Further, the inclusion of these positive experiences reflects the evidence provided in the interviews.

C3.1.1. Caring & encouraging

Many participants, including some of those with abusive or negative experiences, reported experiencing a caring, encouraging and kind side of JF's nature. There were many accounts of positive and helpful interactions with JF and positive impacts on people including their spiritual lives. Many participants commented on how kind they felt JF was and that they only had positive experiences of him.

"The majority felt wonderfully positive about JF; he drew us to him and we were thankful to God."

C3.1.2. Hospitable

A number of participants commented on how hospitable JF was and how he opened up his home, shared meals and dinners with members of ECW and others and how in their experience his home was a place that people visited and felt welcomed. The open-door policy at his home was commonly discussed and the sense of it being a place of activity and community. Although some reflected that only certain kinds of people were likely to be extended continued invitations.

C3.1.3. Relational/personal work

A number of people commented upon how JF was hard working and invested a lot of time in personal work with others. The hours of work JF committed to ministry was reflected in a number of the interview testimonies. Personal work was conducted with males and some participants commented on the positive impact of a mentoring relationship with JF on their own spiritual journeys and careers.

"JF was the most prolific and extraordinary personal worker."

C3.1.4. Letter writing

JF was a prolific letter writer. It is reported that letter writing was an expected component of the pastoral care model operated at Iwerne and that JF continued this in his ministry beyond Iwerne. Some found this a very positive and encouraging act. However, as already stated, others received letters they felt to be manipulative and undermining and described this as an aspect of control.

C3.1.5. Bible teaching & the gospel

One of the most commonly shared messages was the exceptional ability of JF to explore scripture in a way that enabled others to understand it and to engage with it meaningfully, applying it to their own lives. A number of participants commented upon how JF had been instrumental in them developing an understanding and continuing interest and commitment to reading scripture. Also, the way in which JF held scripture in high regard and therefore, messages shared from it, were important and had great impact. Additionally, the gospel was seen of such great import that it was essential that it was taught, and that damage was not done to the reputation of the gospel.

C3.1.6. Charisma

JF was reported to have a charismatic personality which drew many people to ECW.

"JF was an enormous gravitational presence at the centre of Emmanuel Church."

His charismatic personality also made those who he shared time with and approved of feel special and significant and one participant noted that this could constitute a form of control.

"If Jonathan's gaze was upon you it felt very, very special, it was used as a mechanism to control."

However, his charisma and personality were also seen by some participants to be an integral part of the harm experienced.

"His undoubted charisma, combined with this religious fervour, naturally feed off each other and make corporal punishment in this context not the erring of a sinner, but a logical potential outworking of the entire system."

One participant, who was unaware of the behaviours, commented on JF's personality –

"I wonder if some of us mistook eccentricity for the misuse of a powerful personality. That is, of course, easier to say with hindsight. Some people are eccentric, and eccentricity is not necessarily a bad thing, perhaps we can learn to be especially vigilant when a church leader has a powerful charismatic personality to make sure they are always accountable, they don't have favourites and that they don't misuse their power."

C3.1.7. Impeccable behaviour

A number of participants recalled JF's behaviour as impeccable and reflected on his standards including never having only one lodger. The perception of impeccable conduct, again, can act against disclosure or response to disclosure. A former role holder at ECW commented on the impact of JF seeming to live a life above reproach.

"I suggest that JF was living a double life. Publicly he was above reproach (e.g. saying that he could never have just one lodger, in case that was mis-interpreted); he appeared to set high moral standards based on biblical teaching, Privately it seems he was controlling his lodgers and ministry apprentices under the guise of pastoral care, but creating a system of absolute loyalty and submission. I am grieved that this abusive control was so strong that nobody was able to speak out for all those years."

C3.1.8. Loyalty

A number of people described JF as loyal to them. Others discussed a focus on loyalty within JF's teaching and within the wider CE community and this will be explored further in point 4 of the scope, but of importance to this section is that a focus on loyalty, coupled with a charismatic personality, can act against disclosure and against action in response to disclosures made.

"The "loyalty" and "one-to-one" culture alongside Jonathan's personality may have mitigated against disclosure and complaint."

C3.2. The impact of positive experiences

It is really important to reflect on the positive experiences of JF. Firstly, because these positive experiences and his bible teaching made and make it hard for many to disclose and for others to understand, accept or process the disclosures that have been made. This is represented in the degree of shock expressed by many participants, who are still on the

journey of coming to terms with what has happened. Secondly, because many participants had only positive experiences of JF.

“This is why the disclosure of these behaviours in ECW has been so hard to handle as they do not characterise the Jonathan whom we have come to know at ECW, and whose ministry was so appreciated; there is a disconnect.”

There is a need to support individuals who have been impacted by the disclosures, whatever their perceptions and experiences.

“I have woken up every morning since June thinking someone has died, because when I heard it, I thought I can’t believe it.”

C3.3. The myth of homogeneity

One key learning point from this review is the necessity to debunk the myth of homogeneity. This notion of homogeneity can act as an obstacle to reporting and combatting abuse and harmful behaviour because it leads to incorrect assumptions that individuals who possess positive giftings and behaviours cannot behave in harmful, and/or abusive ways, which render them unfit for office. This myth creates a risk that when victims make disclosures they will not be believed or taken seriously and the disclosures will not be acted upon, particularly in faith contexts. It therefore acts as a barrier to the uncovering and prevention of abuse.

Furthermore, those who wish to disclose abuse or harmful behaviours can be caused to question their experience and reality where the predominant narrative outlines the positive traits of an individual. When this is combined with a narrative of protecting the gospel above all else, then this also becomes a powerful barrier to disclosing abuse or harmful behaviour.

Therefore, it is of great importance that faith communities are fully educated about the ability for individuals to behave positively and have great positive impact whilst behaving harmfully and, in some cases, abusively. Within the review there was reflection on a theology of sinners saved by grace and therefore a recognition that all have sinned. There appeared to be an inability to apply this to situations in which people’s experiences are positive or, importantly, where someone has a high-profile, externally successful ministry. All of these factors can result in delayed disclosures, inability to recognise harmful behaviours and ineffective response. All of these are demonstrated within the interviews conducted.

The review evidenced that a person who possesses positive characteristics and is widely highly-regarded could nonetheless display entirely inappropriate, abusive and harmful behaviours which render them unfit for their office.

C3.4. Impact on career

As will be explored fully under point 5 of the scope, JF was extremely influential in the careers of individuals. A number reported he suggested to them about entering ministry or training for ministry. A number reported the clear influence he had upon which position individuals would be placed into. Some participants noted being aware of JF’s ability and role in the career positioning of many in the wider CE world. Therefore, to challenge JF or to speak out, was reported by some to be extremely risky for future career prospects.

“You could see how someone who said something out of turn, their career could be finished.”

C3.5. The role of relationship

A number of participants commented upon the father-like role that JF had for so many. As previously stated, many relationships were established at Iwerne. The relationship for many was, and in some cases still is, deeply positive and encouraging. For others, the relationship provided a spiritual father for those without one. However, due to JF's influence on careers, some commented on being aware of the impact of displeasing JF.

"Maybe there are others like me, from non-Christian homes who had too much to risk emotionally, they didn't have any other Christian father figures and think if Jonathan doesn't like me, I could be cast adrift from that friendship and end up isolated without support."

C3.6. Protecting the gospel

High regard for scripture and the gospel were key elements of JF's ministry. These can be highly positive elements of ministry. However, some participants reflected that a product of the focus on the importance of the gospel was individuals feeling unable to share their experiences of harm and abuse because this risked discrediting the gospel. It is as though the gospel and JF's ministry were synonymous and to speak out against one, risked the other.

"don't discredit the gospel – this can translate into grassing someone up for abuse is discrediting the gospel. You don't undermine the cause; everything is about the gospel cause."

C3.7. Normalisation

A further factor in why disclosures were delayed is the normalisation of many behaviours. In terms of the spiritually abusive and bullying behaviours there was an implicit acceptance of these for some as part of JF's character, the terms 'just Jonathan' and 'just Fletch' were used many times in the interviews when discussing the manner in which he interacted with people. Many commented on the acceptance that JF was eccentric and therefore his behaviours were accepted as part of this persona. As previously mentioned, the term 'benign dictator' as one which JF used about himself. There were repeated mentions of him as a headmaster and other references to 'public school banter'. In this way bullying behaviour was minimised and excused, and when it was disclosed, it was ignored or downplayed even though deeply damaging. A number of participants were questioning why they had not stood up to it more or challenged it at the time.

Others reflected that they felt able to stand up for themselves and that perhaps it was a lack of resilience that led to some feeling bullied and harmed. However, caution is urged in that this could suggest blame for those seen as unable to challenge. What was clear was that there needs to be more understanding, awareness and reflection on these behaviours, and this is currently lacking.

Normalisation is also a factor in the other behaviours, the normalisation of nakedness and naked massage, showers and sauna were discussed by some participants as stated in previous sections.

"I assumed naked saunas were normal because Jonathan was doing this with other men (which he was)."

Cases of JF swimming naked were recounted in some interviews. Partly for some the normalisation of nakedness was due to their public-school background in which it was not unusual to see other males naked. A number suggested that nakedness, therefore, was not problematic and that behaviours had been misinterpreted, and some discussed naked

massage and saunas as consensual and non-sexual, and were concerned this was reflected in the Review. However, a number noted the power differential between JF and those with whom he engaged in such behaviours and reflected upon the inappropriateness of this in a relational context with a minister.

As discussed in section C.2 some participants reflected their awareness that JF was engaged with these behaviours with others normalised this to them.

“Jonathan would drop in that others were having massages, to normalise situation, you are not the only one.”

There was certainly a sense in which the behaviours were not secret for a number of participants, and that this information was shared by JF himself, sometimes naming others who were engaging and even suggesting the massages may be spiritually helpful. The normalisation of nakedness and of participating in the behaviours is a factor in why these behaviours were not disclosed.

C3.8. Consent

As stated in the sections above, some of the participants noted that, for them, massages occurred by mutual consent. Some described these as non-consensual and reflected on the power imbalance in the relationship and the appropriateness of an ordained minister suggesting such behaviours to an individual in a lesser position of power. Some participants describe some of the behaviours as consensual and contacted the Review to ensure the consensual nature of the activities was noted. The Reviewers have reflected on the nature of consent where there is an imbalance of power and where there is potential detriment to the person if consent were not to be given. These factors question the legitimacy of the notion of consent, in at least some of the reports.

“I still have questions in my mind as to whether I was a victim (not abused) or co-conspirator in that I consented to the massages.”

The question of informed consent is extremely important in the accounts presented by participants. Consent was stated as being given by some, and this is still the case for a number of participants. However, there are questions to ask about consent in this context. Some of the activities involving nakedness, when set within a context of a significant power imbalance between JF and another, raise the complex nature of consent and whether in all cases there was indeed a genuine opportunity to withhold consent or even question the suggestion that such activities should take place. As with the generally accepted notion of ‘vulnerability’ (discussed further at C3.13 below) and how this is viewed within this set of events, that of consent also requires some further detailed consideration in contexts such as these.

The Reviewers therefore conclude that the behaviours are completely unacceptable for someone in a position of spiritual authority and constitute an abuse of spiritual authority and power falling far short of the obligations and duties of those in Holy Orders. This conclusion is irrespective of whether the behaviours were deemed to be consensual and non-sexual.

C3.9. Victims not aware of each other

It is important to note that while a number of participants said victims knew others were experiencing the same behaviours a few stated they were not aware of others and this was a factor in not disclosing.

C3.10. Fear

A further factor which is of great importance is fear. As has been explained, the level of fear some participants held was palpable in interviews and email correspondence. Repeated reassurances of anonymity and confidentiality were needed for some. This demonstrates the level of fear associated with speaking out and again can be clearly argued to be linked to the time taken for disclosures to come to light.

C3.11. Victim/perpetrator

An issue relevant to delayed disclosure is where an individual may be both a victim and perpetrator of harmful or abusive behaviour. Fear of being identified as a perpetrator may prevent someone speaking out about their own experiences. This is pertinent to individuals who may have received and perpetrated forfeit behaviour and massages.

"To what extent can a victim of abusive behaviour also be a perpetrator, or does their victimhood ensure their protection from responsibility for harmful actions they have undertaken?"

C3.12. Limited definitions within adult safeguarding

A further complication is the current definition of vulnerability for adults. This definition is particularly pertinent for this report. Most of those involved in any of the behaviours detailed would not have constituted adults at risk of harm under statutory definitions. However, the Reviewers would argue that those who are in contexts in which damaging coercion and control are exercised could be made vulnerable or at risk by this. In domestic violence, coercive control is recognised in family situations. It can clearly be argued that the imagery of family is frequently used within church contexts to represent the relationships between individuals. Indeed, terminology of brothers and sisters is frequently used. Therefore, there is a clear argument to be made that adult safeguarding needs a much more nuanced understanding of adult vulnerability. Further, this case is complicated additionally because relationships were established with many in their late adolescence, which then continued into adulthood. Therefore, this can lead to disclosures being delayed or not occurring. It can also result in individuals feeling complicit or responsible for what happened to them.

There is a recognition that where there is an imbalance of power, where there is potential detriment to the person if consent were not to be given along with other aspects of JF behaviour then this could affect the legitimacy of consent.

C3.13. Lack of an independent external body to disclose to

Some participants reflected that the lack of an external independent body to disclose to was a factor in why the allegations took so long to come to light. For victims disclosing to ECW, the wider CofE or the broader constituency was highly problematic for fear of reprisal or the impact on future career plans. Therefore, some suggested the need for an independent safeguarding body which was external and independent of the CofE and/or the broader constituency and for independent investigation to begin much earlier in the process.

"I think the CofE needs an entirely independent outfit to take over the current responsibilities of the national and diocesan safeguarding teams."

Summary

The interviews demonstrated a number of factors related to the delay in abusive behaviours coming to light. These include JF's character and behaviour, protecting the gospel, assumptions of homogeneity, lack of shared understanding about behaviours

experienced by some as bullying or spiritually abusive, normalisation, fear and a lack of an external body to disclose to. This led to a situation where it could seem wrong to disclose at all, where individuals could feel shame and guilt, and where it was important to protect both JF and the wider ministry he was part of, and this will be explored further in the next section of the scope.

"I can completely understand why it took time for disclosures, firstly you don't complain about him, second response you must have got it wrong, third response, we must gather round to protect."

Further, the behaviours and lack of recognition of the harm caused evidenced in some of the documentation reviewed lead to the conclusion that there are significant and ongoing safeguarding concerns related to JF. These include his involvement in mentoring relationships or ministerial activities. The Reviewers recognise that Permission to Officiate (PTO) has been removed and therefore JF cannot any longer conduct official ministry. However, there is a need for clarity that the significant and ongoing safeguarding concerns relate to all aspects of Christian influence and ministry, including personal work, pastoral care and mentoring.

C4. To what extent the cultural context at ECW provided an environment for abuse to occur and not be disclosed and what factors contributed to this?

An analysis of the interviews provides a depth of information about the cultural context of ECW and factors which could have contributed to abuse occurring and not being disclosed and these are discussed thematically below.

It is important to read this section in conjunction with sections C1-3 as the elements discussed in the prior sections are also relevant to the discussion of the cultural context of ECW, as JF was the Vicar for the period of time on which the Review is focused 1982 - 2012. An examination of the cultural context of ECW is essential, as a number of participants commented on the culture as being an integral part of the issue. Also, some suggest that there is a danger of JF being scapegoated as an individual rather than there being a proper examining of the culture which led to these behaviours being able to occur and not be disclosed or disclosures not recognised or responded to. Whilst this point of the scope relates to the culture at ECW, this section also contains discussion of the wider CE culture. The Reviewers consider from the evidence, that it is not possible to comment on the culture at ECW without consideration of these broader cultures in which ECW was embedded and inter-related.

"The real question is not JF, the most important question is about the wider culture and how this was allowed to happen without being challenged."

C4.1. Positive aspects of the culture

As with the previous section, positive aspects of the culture of ECW were reported by many participants. ECW was noted as somewhere they experienced as a family to which they belonged.

"I want to record the sense of family at ECW, a group of individuals, young and old, and families committed to meeting together, and serving Jesus Christ together".

There were positive comments about JF's behaviour and ministry. A number of participants emphasised their positive experiences of ECW and commented that these were absent from media reporting and social media coverage, which to some felt like it was telling the story of a different church to the one they experienced.

“Some of the things on Twitter and social media don’t really portray our experience.”

C4.1.1. Excellent Teaching

A hallmark of ECW was high quality biblical teaching, there were numerous comments about JF’s ability to exposit scriptures in an engaging and deeply informative manner, many commenting that the teaching still had great impact on their spiritual lives. It is hard to underestimate the ability many reported of JF to explore and explain scripture and the impact of this gifting on the lives of many individuals. This, coupled with JF’s character, resulted in ECW being an important and significant place for many, both socially and spiritually.

“I want to emphasise that Jonathan’s preaching ministry, and his pastoral care of many at ECW and beyond, was held up as hugely important and was valued highly both within ECW and far beyond.”

The biblical teaching was a factor which drew many to ECW as it offered a home for those who wanted to be able engage with Christianity intellectually, which some saw as noticeably absent in other contexts (especially charismatic expressions, which were perceived by some to emphasise feelings over intellectual engagement with scripture). However, on reflection, some did suggest that this placed JF in a position of power.

“For many people, Emmanuel Church Wimbledon was the only place that you could go for intellectual ministry. A ministry that was not embarrassing to the mind. And Jonathan used that for his own purposes”.

C4.1.2. ‘Solid, sound and orthodox teaching’

ECW is a CE church and the teaching delivered reflected, and reflects, this positioning. Many participants noted the importance placed on ‘solid, sound and orthodox teaching’ within ECW. These words were repeatedly used in interviews. Some commented on negative perceptions of others holding more liberal positions or a lack of understanding of these. There was a sentiment that under JF it was seen as important to hold fast to the solid teaching and positioning he espoused.

C4.1.3. Emmanuel as a success

ECW was perceived by some as a very successful church, as the congregation grew significantly in number and profile.

“People flocked to ECW, he built up a church from a small group to hundreds.”

It was a place which became and remains a family to many. It also offered a home to those who wanted to explore Christianity intellectually. It undoubtedly provided positive experiences of church life for many who attended.

We however question whether a church should be defined as entirely successful given the information gathered around the profoundly harmful behaviour of JF that occurred, and the aspects of unhealthy culture that have been experienced by many.

C4.2. ECW as independent but inter-connected

ECW was deeply inter-connected with the wider CE world, but also in many ways operated as an independent Church. This is one of the most important aspects in understanding why abuse could occur and not be disclosed. Although the primary focus of this Review is on the behaviour of JF and the culture of ECW, it is not possible to answer the scope points without exploring the wider cultural contexts in which ECW is situated and the overlaps between individuals and organisations that are part of this constituency. The systems approach adopted for this Lessons Learned Review allows for this exploration.

C4.2.1. ECW as inter-connected & the status of JF

ECW was and continues to be interconnected and had ongoing relationships with many organisations in the CE constituency including Iwerne, The Proclamation Trust, ReNew, Reform, Cornhill, Church Society and GAFCON. Many saw these connections as key to enable a detailed understanding of the holistic story. For the Reviewers, the inter-connectedness noted within the interviews is at the heart of the behaviours experienced and responses to them.

Being a person of influence in one Church, however significant, provides power but with clear boundaries. Being a deeply influential person within a much broader interconnected network creates much greater power and much less opportunity for individuals to disclose and a situation in which many may owe their positions to you.

“Officially he was just minister but in reality, his power was greater than any bishop in the Church of England.”

To speak out, to some, therefore represented speaking out against the CE constituency and therefore to risk damaging the whole constituency. It is hard to under-estimate the status which JF was reported to hold by many participants.

“His influence over the church and the conservative evangelical wing of the Church...wherever you went everyone knew him, his spiders web of influence meant to stand up against him you were standing up against a lot of people.”

The relationship between JF, ECW and Iwerne, for a number of participants, was key in understanding. As the interviews progressed, the links to Iwerne and parts of the wider CE constituency became more significant to the Reviewers. Many who attended ECW also attended or had attended Iwerne; JF was deeply influential in Iwerne. Some commented that ECW itself ran as a mini Iwerne and some of the controlling behaviour mirrored what was experienced in Iwerne. There was a fear expressed that with the focus on John Smyth and Iwerne, a further case to which Iwerne was linked, would be extremely negative. Some expressed the feeling of the need to protect Iwerne, and this again could act against disclosure within ECW as the two were seen as closely linked.

“So, protecting Iwerne and its influence meant that perhaps people's judgments on safeguarding and reporting were secondary to that.”

For the Reviewers it became clear that you cannot really understand elements of the culture at ECW without understanding Iwerne and the overlapping sectors of the CE constituency, the view of leadership, muscular Christianity¹⁰ and exclusivity that pervaded much of this culture and was reflected, at least in part, at ECW.

“JF was centre stage at the camps, he was a powerful figure - this was a muscular Christianity, Iwerne was about the elite.”

¹⁰ ‘Muscular Christianity’ was a key term used within the interviews. The specific view of masculinity and manliness was seen to be prized by JF and others in ECW and beyond. Muscular Christianity is defined as: ‘a Christian commitment to health and manliness’ (Putney, 2003 as cited in Sipiwe, 2015, P2). Muscular Christianity combines a focus on physical exercise, Christianity and manly character (Hall, 1994). The view espoused in that physical strength and engagement in physical exercise and sports, equates to being strong enough to be effective in sharing the gospel, and weakness makes you ineffective (Putney, 2011). The muscular Christianity movement arose to some extent as a response to what was seen by some as Christianity becoming an effeminate religion (Sipiwe, 2015). Muscular Christianity is associated with religious certainty and beliefs about being able to control and shape the world and also being able to withstand potential threats (Hall, 1994). Bennett (2016) suggests athleticism, masculinity and sports are often connected in boys schools and notes historical links between muscular Christianity, athleticism and class formation in elite schools. Within the review the term muscular Christianity was often used to refer to the focus on public school, sports and sporting achievements, and these being seen as pre-requisites for effective ministry and a criteria for belonging and being part of the inner circle.

JF's roles and presence in other organisations connected to the CE community provided him with a status and standing that should not be underestimated.

"You need to understand Jonathan's status in ReNew, Iwerne and evangelical circles, over decades he built up his ministry and network of people – all of whom owed their positions and indeed their conversion to Christ to him. He was the man who disciplined them in early years. As he rose through ranks to become emperor, king, top dog – everyone around him was under him or their boss was – it felt like all roads led to Jonathan."

C4.3. JF's influence on careers and ministry

As stated in scope point 2, due to his status and connections in ECW and beyond, JF was able to exert a high degree of influence on people's careers and future positions. Some saw this as a positive influence as helpful in guiding them to ministry careers and positions, and others saw this as a source of control, in that JF was described as a 'king maker' who could determine whether individuals would be selected for roles. JF encouraged a large number of men to ministry training and careers beyond. In this context, people expressed feeling unable to speak out because of the possible consequences for your future. JF's strong influence on individuals' careers was a key theme in the interviews and is essential to understand.

"I think if you wanted to go down the route of ordination not making him cross was probably very important."

C4.4. Leadership on a pedestal

JF's status as a leader was referred to as 'leadership on a pedestal' and this resulted in it being very difficult to challenge him but also to recognise inappropriate behaviours and ways of operating. Interestingly and incongruently, JF taught against putting leaders on a pedestal but it was clear that he held this position in ECW. His status and position in ECW and the wider constituency added to the lack of accountability structures (see scope point 6) in ECW which created a situation in which JF's leadership was influential and difficult to challenge and to disclose.

"J taught the sin of the congregation would be to put him on a pedestal and his sin would be to let them. But the truth is he was put on a pedestal and so there was such a strong feeling of him being loved and respected and you would say – who am I to challenge his behaviour."

C4.5. Inter-connection and power

It is clear that JF's position within ECW was in part due to his position external to ECW; many have commented that it is impossible to separate these. There is also reflection from a number of people that without that standing in the wider community, the influence and power held would not have been achieved.

"If ECW was isolated from the power network a lot of what went on couldn't have happened."

Therefore, it is essential that reflections are made about the position of ECW moving forward and the holding of power within the wider CE network that it is part of.

"If the conclusion of all this is simply to focus on the inappropriateness of massaging and physical discipline, I think we will have entirely missed the point. Conservative evangelicals need to look carefully at our love for inner rings, our culture of nepotism, our suspicion of outsiders and the hidden damage done by all of those things."

This is especially important where models of leadership and interaction may have been learned and replicated.

“Unfortunately, Jonathan’s influence has been so great that the conservative evangelical constituency has been thoroughly tainted by him. There isn’t a single conservative evangelical clergyman who hasn’t been affected by him Many others have adopted Jonathan’s rather bullying way of operating and have a seeming lack of ability to see abusive behaviour (bullying, ridicule, minimising, gaslighting, lying) for what it is. There has been a very hierarchical structure, where some people matter, and others do not. Clergy do not understand the trauma that Jonathan’s way of operating has caused and do not see that Jonathan has no right to tell clergy what to do. As people have bowed to him and followed his ways it has stripped out the variety that ought to characterise God’s people.”

C4.6. ECW as independent

ECW was inter-connected, but also independent, and this is equally important to consider as inter-connectedness. Notably because of how this independence contributed to some form of a barrier between ECW and the Diocese, which has implications in both directions for safeguarding and response to allegations.

C4.6.1. Proprietary chapel and independence

As a proprietary chapel ECW is financially independent from the CofE. There was a perception in a number of the interviews that this independence and status led to feeling independent and free from accountability to the CofE in other aspects of church life and this allowed behaviour to occur without being addressed.

“Proprietary chapel is important –right from the outset, we were given a slightly free reign. I do think this helped Jonathan be very autocratic. It made it much easier to be independent and autocratic.”

C4.6.2. Theological differences led to an accepted separation from the Diocese

The focus on ‘sound, solid and orthodox’ teaching within ECW led to some distancing and a clear breakdown of relationship with the Diocese, which was felt by some to hold liberal positions on issues such as women in leadership and sexuality. Whilst it is not a focus of the review to comment on any theological position the reviewers are clear that the theological differences are clearly evidenced to have led to a separation and othering of the Diocese and perceived liberal constituencies of the broader CofE.

“We would rarely hear anything positive theologically about the Diocese, so this colours your thinking of other things that come from the Diocese. There was a general atmosphere that anything coming from the Diocese was slightly suspect. The impression was if we think the CofE is wrong, we will do what we want to do. This is the distinct impression we were left with.”

It was clear to the Reviewers that while the Safeguarding Officer at ECW and the DSA had a generally positive working relationship, there was, to a certain extent, negative perceptions held within the Diocese of ECW as being difficult to work with and this further added to their independence. This separation added to ECW’s independent positioning and importantly had, and has, consequences for safeguarding and partnership working (see scope point 6).

C4.7. Bullying/ Spiritual abuse/ Manipulation and Control

As has already been explored in this report, bullying, manipulation and control and spiritual abuse were documented by some participants. These behaviours were documented in

staff meetings, the treatment of some staff and members of the congregation, within Bible studies and other meetings of ECW. The behaviours described were interpreted differently by some. However, many were reflecting on behaviours witnessed and now asking questions about their appropriateness and content. What is evident is that these behaviours (however they were interpreted) were part of the culture at ECW and part of the reason why behaviours were not disclosed.

C4.8. ECW as a culture wanting strong orthodox leadership

It is interesting to note that a number of participants praised JF's 'strong leadership style' and suggested that this was something that was valued in ECW, particularly in terms of being able to take a stand against liberal theologies and positions.

"People talk now about his dominance. In my view, the people in the church wanted this; they wanted someone strong who would stand up against the liberals and secular people."

C4.9. A Culture of selectivity and the inner ring

ECW was, to a large extent, a church comprised of successful professionals; there was not a great amount of diversity in terms of ethnicity, education, class or background. Within ECW there was reported to be the inner ring of those who were favoured by JF.

"Together with the way JF cultivated inner rings and was allowed by others to do so, young (and older) men like me basically craved his approval and as a result he was able to do what he liked without being challenged."

The characteristics of those were that they were men, predominantly with public school backgrounds, often sporty and most of whom had attended Iwerne camps. These were frequently referred to as 'bright young things.' There was, to some extent, a celebration of muscular Christianity at ECW.

Some participants acknowledged being part of the inner ring and others reported being aware that they were not, and some stated there was a sense of exclusion. The existence of an inner ring created a further source of power within ECW. In some ways there were concentric circles or layers at ECW; the inner ring, those in the next circle aware of the inner ring and their exclusion from it. For others they were in the outer ring and often it was possible to be extremely satisfied with being a member at ECW, not really experiencing the negative bullying behaviours. This also explains how so many were shocked when the allegations were disclosed.

"People talked about Jonathan's 'golden boys'. I did know there were the golden boys and I knew I was in it, that group and I felt a bit pleased with myself. I enjoyed the support and I put the hours into leading lots of things, unconsciously to reinforce that status. You needed to be good looking or Oxbridge or public school or all of the above and spiritually very involved... if not you weren't in the special group."

"You want to stay in that halo. Looking back this is very sad. I can see now how I was not responsible for someone making me one of the golden boys, Jonathan was responsible".

C4.10. A culture in which JF had influence on marriage partners

A number of participants discussed JF providing guidance on future marriage partners and at points being open about his disapproval of partners people had chosen. Some felt he would have preferred individuals not to marry but marrying the 'right kind of woman' was seen as important to future success and inclusion.

C4.11. A culture in which JF's approval was prized

JF's status and charisma mean that people were drawn to him. A number of people reported wanting to gain his approval. Some participants commented that this reflected the level of influence JF held, and others, that this level of influence and the desire to be liked by JF created a form of power.

"You start to get this kind of power when you create a situation around yourself where you manage to get yourself into position where people want you to like them."

C4.12. A culture in which loyalty was important

ECW was a culture where loyalty was important. In many Christian cultures there is a healthy emphasis on unity and loyalty to each other, which is often the basis of extended support and care. JF's positive standing in ECW and beyond arguably created a culture in which loyalty to him could be expected and this is not necessarily negative in Christian communities. However, some participants noted the relationship between loyalty, charisma, standing in the community and power held.

"He was widely known as speaker and Christian leader within the conservative evangelical group he was one of the key figures. People had that immense loyalty that they often had to powerful charismatic leaders."

For some, the focus on loyalty was equated to not speaking out or gossiping. A number of participants discussed the disapproval of gossip, which again is common across Christian cultures striving for unity. However, for some, the focus on loyalty was felt to create a situation in which complaint was muted.

"People are easily written off by whispering campaigns, if you don't tow the line, or step outside of expectations, loyalty is a big thing."

Some spoke of being actively discouraged from speaking out, in a culture where one person described whistle blowing as an anathema.

C4.13. Informality in culture

In the interviews some people described how elements of ECW were carefully controlled but there was also a reflection on informality in the culture. This informality led to decisions being made as 'gentlemen's agreements' and there was a celebration of not having written records or contracts. This was seen as not tying things down and trusting each other. In some ways what might be covenant agreements (spoken and verbal consent) were prized over written contract agreements which might be deemed legalistic.

C4.14. The Status and role of women in ECW

Some participants commented on respect for women in ECW, the positive impact of the women's ministry and JF's respect towards women. One participant contacted the Review as a woman to ensure the positive experience of women were included in this report. However, a number of others, including male participants, referred to misogyny, ignoring and disregarding women and their gifts. This was not solely related to the complementarian position of ECW. However, this led to no women in leadership and a number of participants commented that a more balanced perspective would have been provided with the inclusion of women in leadership positions and suggested this as important to the future of ECW. Some commented that women who challenged or spoke out were seen as difficult, and some were aware that the expectation was that they would not be difficult, lazy or unhappy. It was clear that some women had experienced significant pain from their positioning within ECW and the lack of recognition of their abilities, gifts and place within the Church. Some men also commented upon the positioning and

behaviour towards women and felt strongly that a re-examination of attitudes towards women within ECW was required.

Summary

The examination of cultural elements of ECW give an insight into how abuse could occur and not be disclosed. ECW was perceived by some as a very successful church, as the congregation grew significantly in number and profile. It was a place which became and remains a family to many. It also offering a home to those who wanted to explore Christianity intellectually. It undoubtedly provided solely positive experiences of church life for many who attended. However, for others, experiences were profoundly harmful and abusive.

The Reviewers question whether a church should be defined as entirely successful given the information gathered around the profoundly harmful behaviour of JF that occurred, and the aspects of unhealthy culture that have been experienced by many.

One of the key factors underpinning this is ECW as interconnected whilst simultaneously operating as independent. The last four sections have illustrated that the combination of JF's personality and influence within and beyond ECW created a situation in which he held relational and institutional power. This enabled behaviours to occur and be unlikely to be identified as harmful. If behaviours were identified as harmful, they were unlikely to be disclosed and, until recently, unlikely to be actioned. It is important to note that JF was, and is, responsible for his behaviour and decisions made whilst holding a ministerial position. An examination of culture does not negate personal responsibility.

"It happened because people like Jonathan had this level of control over people ... if you weren't prepared to offer up that level of submission, you left. You ended up with a generation of leaders who were compliant... forceful and robust people, but compliant to the direction and directing of the Jonathan Fletchers of that world. I have to say the next generation of leaders in the Conservative Evangelical community demonstrate some of these traits of delightfully charming but ultimately overbearing. In the end I left Jonathan's sphere for cultural not theological reasons, it is an unhealthy culture."

As demonstrated in the last quote, it is the opinion of many participants and the Reviewers, that JF's behaviour occurred in a context and constituency in which leadership on a pedestal was prized and the culture of ECW and the wider community in some ways enabled the behaviours to occur without accountability or scrutiny. It also facilitated a context in which disclosures could be minimised with rationales of protecting the gospel, protecting JF, protecting Iwerne, protecting the wider constituency and protecting the successes that had been achieved.

C5. To what extent JF was able to have a continued influence on the culture and decision making after his incumbency completed in 2012?

This point of the scope addresses JF's influence post his incumbency at ECW and key themes related to this are addressed below.

C5.1. JF's continued influence in ECW

JF continues to live very close to ECW and due to his relational leadership style and length of time at ECW he is still in relationship with some members of ECW. There was a suggestion by some that he should have moved on retirement, as is common practice in the CofE and particularly in light of the disclosures made.

Some participants suggested JF had behaved well and had not influenced ECW since retirement. However, a larger number commented on continued influence particularly through critique and sometimes subtle undermining of the new Vicar and his methods of ministry and leadership.

A few participants did not reflect positively on recent changes made and referred to the positive aspects of JF's leadership style as a model they would wish to see continued.

C5.2. Lodgers

JF continued to have lodgers after his retirement and after the removal of his PTO in 2017. Some of these lodgers attended ECW or had connections with ECW. There is a need to reflect on what information sharing process occurred to inform prospective lodgers about concerns about behaviours post the disclosures occurring. The extent to which it would be reasonable to consider a degree of transferable risk in this scenario also bears the need for consideration.

C5.3. Continued ministry and influence

There is evidence that post the removal of PTO, JF continued to speak at some events, to attend some conferences and to have some influence in the wider CE community.

There are important questions to ask about what information should be shared post removal of PTO and who this should be shared with. Without this clarity there was a void of information, which was deeply unhelpful.

"I first heard something about Jonathan not having a PTO at the end of April 2018. There continued to be confusion about the situation and that continued for many months. In Sept 2018 we hadn't heard for sure and there was some question mark about what this actually meant and what he was allowed to do - what was he allowed to do and not allowed to do wasn't clear."

Further consideration is needed around the responsibility currently placed on vicars to not allow other ministers with removed PTO to minister in their church, as this is a disciplinary offence. Thought should be given to the pressures of placing this responsibility on more junior vicars. This pressure is especially the case for all vicars when the person with PTO removed has high status and influence, as refusal could be extremely challenging.

The sharing of information around PTO removal is deeply complex. However, an absence of information creates a void in which the individual who has had PTO removed can construct and deliver their own narrative and reasoning about its removal. In this case there are accounts of JF informing people that he had given back his PTO in response to the treatment of another minister and liberal positions on sexuality by the Diocese. Further, as little information was given, some in ECW considered that PTO removal was likely to be related to theological disagreements with the Diocese and their liberal positioning.

"There was a feeling of could anything good come out of Southwark, When the announcement was made by Southwark about removal of Jonathan's licence – I thought and others – this is a stitch up – yet again Southwark having a go at the conservative constituency."

It is important to note that even when PTO is removed some individuals will maintain their title of Reverend and wear a dog collar, all of which allows continuing influence and perception of an enduring position and responsibility .

A further consideration is what constitutes ministry. PTO only applies to licensed ministry in the CofE, but the expectation is that this includes leadership of Bible studies or groups taking place within Churches. However, what is more complex is Christian events that

occur external to the CofE context, such as Bible weekends, and conferences in the broader constituency. The removal of PTO does not extend to these and therefore continued influence is possible even when PTO is removed.

Thought should be given to action that can be taken when someone acts against any restrictions on ministry resulting from the removal of PTO or is asked not to attend events and refuses to comply, as was reported in the interviews.

"This is very recent – he can't just go on doing ministry when he's been told not to...he can't just carry on trying to be a clergy man – he just won't stop."

Summary

Due to the confusion over the removal of PTO JF was able to continue to have an influence on the CE constituency and, to some extent, on ECW. Due to ongoing relationships with those at ECW and the geographical proximity of his residence to ECW, it can be argued that he had some ongoing influence at ECW after 2012. A review of the evidence shows a clear need for the PTO removal process to be reconsidered, with clear guidance in place especially about what constitutes ministry. Clear thought needs to be given to information sharing processes around removal of PTO to enable vicars to avoid allowing someone with PTO removed to minister within their church.

C6. To what extent the policy, procedure and process for reporting abuse prevented earlier disclosure, and/or earlier action, taking into account how safeguarding policy evolved over the relevant years?

C6.1. Evolution of Safeguarding Policy in the CofE

There is a recognition that safeguarding policy and practice has evolved over time. It is widely recognised that this evolution happened at a quicker pace in statutory authorities and the secular world than within faith settings.

In recent years, the CofE has altered a significant number of its policies and practices in respect of safeguarding. For a summary of the development of safeguarding in the CofE see appendix 2. ECW's safeguarding needs to be reviewed in the context of these broader changes.

C6.2. Policy, procedure and practice in ECW 1982 - 2012

In many ways the development of safeguarding in the CofE has been slow, in ECW the pace of evolution has been slower still. Whilst it is clear that from 1982 to the early 2000s the safeguarding landscape was very different, often focussed on child protection, after 2000 there would have been an expectation of more robust arrangements.

"Since safeguarding was originally for children and later vulnerable adults the idea that church ought to be a safe place for everyone was and may still be missing from conservative evangelical thinking. Since this was not part of the culture's thinking Jonathan's abusive behaviour could continue unchecked."

C6.3. Safeguarding leads

There have been 3 safeguarding leads (including JF as Safeguarding Lead by default prior to 2012) that we have been made aware of and there is a recognition that others with PSO status have contributed to the safeguarding arrangements at ECW. A number of others have PSO status (e.g. DBS Manager) to allow them to operate as a part of a safeguarding team.

There are some key themes that speak to the development of safeguarding over time and the impact that these had on the disclosure of abuse and action being taken earlier.

C6.4. Lack of safeguarding policies, processes and procedure

A high number of members or former members of ECW reported being unaware of safeguarding policy, process and procedure at ECW at this time. Processes and procedures that were in place were described as informal and common sense.

In 2002 CRB checks were brought in and it is reported by those that worked with children that these were undertaken and that there was compliance with CRB checks. For many, CRB checks were equated to safeguarding.

The first mention of safeguarding training was in 2010 where some key role holders were trained but there are no formal records of this. There was further training provided by the Diocese in 2012 and 2014. Records were kept of attendance at these and these attendance lists have been viewed by the Reviewers. Prior to 2010 there appeared to be a reliance on common sense and others' safeguarding knowledge they had acquired in other roles outside ECW. There were some conversations about practice around taking children to the toilet, not being 1 to 1 with children, young people and women but these were described as informal conversations. If there was safeguarding or child protection training, this was not mandatory.

Around 2010 diocesan structures began to come into place regarding safeguarding guidance around CRBs, safeguarding training and ECW began to engage with this. Until 2012 there appeared to be a lack of awareness of who the safeguarding lead was and a lack of clarity about where to report any concerns. Safeguarding could not be argued to be a priority, which was taken seriously.

"Safeguarding procedure was non-existent, I can't remember any safeguarding training in ECW, it just wasn't part of the culture at ECW – don't know the name of safeguarding officer while on the staff team, if there was, I have forgotten about them, never had any interaction with them. So, it was not on the radar, safeguarding was avoided – it wasn't neutral it was worse than that".

C6.5. Culture of informality, lack of recording, lack of importance/value given to safeguarding and lack of confidentiality

A number of participants have spoken about a culture where informality and a lack of recording was celebrated from 1982 to 2012. There was an emphasis on gentlemen's agreements without formal recording.

Where people did have safeguarding knowledge, this was shared with teams, but it was clear that safeguarding was not a focus as the primary matter of importance was to do Christian ministry. Even when people knew that things were supposed to be in place, they didn't feel able to challenge; this included around policies, processes and CRB checks.

In some interviews safeguarding was reflected upon as having been dismissed or perceived as negative modern and professional. Some reflected this was not a case of JF legitimising abuse but more to do with his dislike of the modern and professional. Others gave an alternative view that this may have been more purposeful aversion to safeguarding from JF. Whichever perspective is correct, if this was the view of the safeguarding lead, which JF was by default, this can be argued to have had an impact on how safeguarding was viewed within ECW, both by those responding but also by those who may wish to report concerns.

“What matters if safeguarding is weaponised it means we can think negatively about it and this can lead to less effective response.”

It has been reported that there were only a handful of safeguarding concerns (no more than 2 or 3) within this time. This would have been significantly below expected safeguarding concerns within the 9-year period that was discussed by the participant. Other participants were clear that even where these few issues were raised, they were not dealt with by the Diocese due to a reluctance of ECW to report through to the Diocese. The impact of the relationship between the Diocese and ECW on safeguarding is explored further later in this section.

C6.6. Confidentiality and information sharing

The sharing of details of people’s personal lives in order to pray about them and the lack of confidentiality during staff meetings with personal information shared can be argued to undermine confidence in sharing sensitive concerns or disclosures. Whistleblowing would be extremely difficult. There is a suggestion that a change is needed in how disclosure of harm is perceived and the discourse of this within some Christian contexts.

“There needs to be early opportunities to get advice – we need to break down the feeling that phoning for advice is somehow dobbing someone in or being disloyal. This needs to become the norm in our churches.”

C6.7. Safer recruitment, safer working practices and human resources

The informality seen with safeguarding was also seen in the recruitment working practices and other human resource processes until 2012. There didn’t appear to be any policies or procedures, job descriptions, contracts, grievance procedures or complaints processes. There was no staff handbook and little evidence of any formal HR processes. There were no grievance procedures, no whistleblowing procedures nor even robust arrangements for booking leave. It was suggested that these could have been regarded as a bit irrelevant and unnecessary to run a church.

“It would always have been a bit of a joke that no one had a contract – it was all very informal in terms of HR – seen as oh that’s just Jonathan or even like a slightly good thing – he doesn’t need things normal people need – he can just run things without that sort of support.”

Participants stated that they never had any formal code of conduct until at least 2012, but the focus was on godliness. There was an unwritten code of conduct in the frame of Christian relationships and fellowship. This was described as the spirit, not the letter, of the law.

It is acknowledged that in 1982 recruitment processes were very different. The recruitment of JF does however appear to have been outside usual process at the time. Church Wardens were not involved in the process, and JF did not attend a service. It was very much a decision of the Trustees¹¹.

Recruitment in JF’s incumbency was reported to focus on schooling and gifting rather than character and whether you were suitable to undertake the role. Whilst it is recognised that safer recruitment developed over time and that CRB checks were undertaken when these came in, they were not adhered to. The Reviewers conclude that the focus on schooling

¹¹ Emmanuel was established by a trust deed in the c19th. The trustees held the legal title to the property and appointed the vicar (i.e. they were the patrons) but were not involved in the running of the church. Most were not members of the church. On 10 January 2012 the trust was incorporated as Emmanuel Church Wimbledon. The original trustees are now called the patrons. The current trustees have legal responsibility for the church under company and charity law and are involved in the running of the church.

and gifting as opposed to character, and suitability in relation to recruitment, was unbalanced and unhealthy.

In combination with the influence that JF held over careers, the lack of accountability would have compounded the inability to challenge JF, the culture or the working environment and led to an unhealthy culture both in terms of the working environment and in ECW as a whole.

C6.8. Response to disclosures and concerns raised

It was clearly known by some that ministry trainees and curates were struggling, especially in the context of the working relationship with JF and staff meetings. It has been recognised by a number of role holders that they did not respond as effectively as they should have, where complaints were raised, bullying behaviour was witnessed, or people were seen to be struggling. There is evidence that these concerns were raised with JF but no action was taken to follow this up externally with the Diocese. There is a clear remorse, regret, shame and guilt shown in some for not having taken the appropriate action here. This is linked to the failure to notice or perceive the seriousness of JFs conduct.

It is important that this lack of appropriate response is seen in the context of loyalty to training vicars, some being victims of JF's behaviour themselves, the culture of fear, coercion, control and manipulation and the lack of understanding of spiritual abuse at the time. Some participants spoke of other role holders who were not only aware of, but also perpetuated the behaviour. This went beyond not dealing with this appropriately, to being part of the problem and the culture.

The response to disclosure or concerns raised during this time period indicate an unsafe response. There were two occasions where people had been highlighted as a risk by previous involvement with statutory authorities (2009 – 2012). The risk here was not managed as it should have been. The reported response from JF was that actions would not be taken due to a belief in second chances and grace. Where these, and a number of other separate concerns were raised, the response was either to not address these or to give assurances that these concerns would be dealt with and then little or no action would be taken. Where the Reviewers have become aware of safeguarding concerns that were not dealt with appropriately, safeguarding advice has been given to report through to the Diocese. The Reviewers have checked with the Diocese that these concerns have been reported and are being actioned.

Where the Reviewers believe that these do not meet the expectations of practice at the time or represent ongoing concerns, these will be raised with the Parish Safeguarding Officer and with the Diocesan Safeguarding Officer to ensure appropriate action is taken with the necessary external scrutiny and accountability.

C6.9. Internal accountability structures

Whilst JF was Vicar, participants noted, there were different levels of leadership but no real accountability internally or externally.

"It was very clear that JF was in charge of all operations in the church, there was no clear oversight over his conduct, the people that acted as Church Wardens seemed to me to be figure heads who were answerable to JF, as a congregant it was not immediately apparent/ obvious who JF answered to."

The evidence collected illustrates that there were not effective checks and balances in place in the culture at ECW and this had implications in that people were able to keep behaviour hidden.

“JF was probably able to keep it secret because he was allowed to be an autocrat without any supervision or appraisal so far as I could see”.

It is important to state that there were accountability structures in place internally such as the PCC, Trustees and Church Wardens. However, these accountability structures were acknowledged by many to be ineffective, including by role holders themselves. The PCC, Trustees and Church Wardens had little power and were therefore unable to hold JF to account.

“When we reflect now, we realise that to us, Jonathan didn’t feel accountable and that in his own mind wasn’t accountable. There was a culture of deference to Jonathan.”

Others had a different view regarding accountability structures. They were clear that the wardens and JF met on a fortnightly basis throughout the year. It was felt there was honesty and openness on any matter. Whilst there was a structure it was recognised that JF was not accountable to the wardens in the formal sense. It is also worthy of note that there was a power differential in the relationship.

There was also a lack of external accountability. There was an element of othering of the Diocese and the CofE, a creation of an us and them situation. This in some part, is due to theological differences and it was reported that when JF was a Vicar, to some extent his approach to the Diocese created mistrust and this had implications for safeguarding.

“Mistrust of Diocese – you can’t distinguish between diocesan safeguarding controls and diocesan theology.”

This can mean accountability is lost externally. Others felt this was purposeful in order that no scrutiny could occur. It can be concluded that, there was a lack of safeguarding and little accountability.

C6.10. Presentation of accountability

The internal accountability structures that were in place gave the presentation or perception that there was accountability. A clear example of this is JF presenting his letter of resignation to the patrons upon appointment to be used at any time. This gave the impression of complete accountability, but it is questionable whether the resignation letter would be used in a context in which someone holds status and influence.

It is reported that JF mentioned that he had Church Wardens ‘to hold me to account’ in his sermons. This perception of accountability meant that people were less likely to question or challenge as it was assumed that JF had accountability, which the evidence suggests, did not reflect the reality at ECW.

“Having Church Wardens ‘to hold me to account’. He often mentioned this in sermons. While Jonathan said this in his sermons, I really don’t think he asked his wardens to hold him to account in a genuinely open way but (being quite a tour de force) probably asked them to ask him if he’s having his quiet times. He probably will have set the agenda of how they were to hold him to account because he was such a charismatic / dominant personality, and he ran the show”.

C6.11. External accountability structures

C6.11.1. Proprietary chapel status and safeguarding

It was recognised by participants that the proprietary chapel status had potential to make safeguarding processes less stringent. As propriety chapels are maintained by private individuals, they are therefore financially independent from the CofE. This allows a greater degree of independence across the board. It is clear however that where this relates to safeguarding, it is essential that policies and procedures are adhered to.

“Proprietary chapels are fine to exist, but they need to clearly and squarely keep to safeguarding rules.”

C6.11.2. The relationship between ECW and the Diocese

The theological differences between ECW and the Diocese led to an accepted separation - this is discussed in greater detail under scope point 4.

The theological differences and the general poor relationship with the Diocese can be evidenced to impact on the safeguarding relationship between ECW and the Diocese. The disagreements theologically led to many feeling that this meant not agreeing generally. In a context where the Diocese was viewed with suspicion, it was argued that any safeguarding advice would also have been seen as suspect and approaching the Diocese with concerns would be very unlikely to be seen as the proper course of action and led to another layer where accountability was absent.

“Diocese was seen as spiritually dangerous, pretty hopeless and useless so why would you go to them. This places you in a very dangerous position as a church if you refuse to be accountable to the body you are supposed to be accountable to.”

Relationship and communication are the responsibility of both parties. There is also a need for reflection on the role of the Diocese within the relationship between ECW and the Diocese.

Whilst ECW regarded itself as somewhat independent of the Diocese, it is important to note that the Diocese do not appear to have provided the oversight of ECW that was needed. There needs to be a recognition and a reflection on the role of the Diocese in cultivating this independence due to the strained relationship with ECW. The Diocese does have a role in supervising their clergy, providing a level of oversight and the diocesan safeguarding officers do need to be involved and facilitate communication with parish churches. There was a responsibility on both the part of ECW and the Diocese of Southwark to build and maintain a positive relationship and communication around safeguarding. This responsibility continues for both parties.

“I look back and think about the CofE structure and accountability – if you are in a church where this system of accountability to the Bishop and Diocese has broken down you are in a dangerous spot.”

The Reviewers regard this breakdown in relationship, the longstanding poor relationship and continued strained relationship between ECW and the Diocese to be a major factor in what we deem to be the lack of effective response to the disclosures and other concerns regarding the behaviour of JF/other safeguarding issues that were raised during JF’s incumbency.

This is explored further in scope points 7 and the lessons to be learned are discussed in scope points 9 & 10.

C6.11.3. Role of Provincial Episcopal Visitor (PEV).

A participant described a complex relationship between the role of the PEV and the CofE. The multiple layers of authority and context lead to greater complexity. Where another Bishop is involved in the oversight of a parish this adds to the complexity of the oversight of the parish church. In conjunction with the proprietary chapel status the challenge of relationship with the Diocese of Southwark is increased.

Where there is increased complexity in governance, oversight and accountability arrangement it is vital that there is absolute clarity about the roles and responsibilities of each party in that relationship. The role of the PEV is to overcome theological differences

and therefore there is a need for absolute clarity in writing of the roles and responsibility of the PEV and the retained roles and responsibilities of the Diocesan Bishop.

C6.11.4. Impact on the view of safeguarding, people feeling safe to raise concerns and disclose

All of the factors detailed in this section of the report led to people being unaware of where to raise concerns and, even if they were aware, there wasn't a confidence of confidentiality and that appropriate action would be taken. In the period of JF being Vicar there was no official safeguarding lead. The expectation would have been that the Vicar would have reported any inappropriate behaviour or abuse. There is a real significance to the fact that JF was in essence safeguarding lead by default. The other evidence in this Review details how difficult challenging JF was for many. It can be argued the challenges noted would also apply to raising issues of a safeguarding nature. The information that we have received is summarised below.

Summary

In summary there were a large number of factors around policy, procedure and process for reporting abuse at ECW that prevented earlier disclosure or action being taken. There was a distinct lack of policy, process and procedure. In addition, a celebration of informality, a lack of recording or confidentiality and the lack of value placed on safeguarding undermined confidence in being able to disclose or raise concerns. There was a lack of HR processes and procedures around contracts/statement of particulars, staff handbook and grievance and whistleblowing procedures. This, combined with JF's influence on careers and the culture of ECW, led to a situation in which it was difficult to disclose, raise concerns or respond appropriately to concerns that were raised.

Whilst there were internal and external accountability structures, it is deeply significant that they were evidenced by the participants to be ineffective. The fact that structures were in place, but ineffective, led to a perception or a presentation of accountability that meant this lack of effective accountability was never challenged.

The relationship with the Diocese and the othering and undermining of the Diocese due to theological differences meant that concerns would be unlikely to be raised with the Diocese.

In summary if you needed to raise a concern about JF at ECW this would have been deeply difficult. The only means of raising a concern about JF would be to raise this directly with JF or challenge him regarding his behaviour and many were concerned about the consequences of this. The alternative was to raise this with someone who was deferential to JF; this information was likely to be referred to JF and there would be similar consequences. To take the concern to the Diocese would also be deeply complex. The evidence suggests, people were left in a position which effectively silences them and left a void in which concerns could not really be raised, taken seriously or actioned.

C7. Whether the ECW response to the disclosures and allegations was adequate and protective (2012 -2020).

C7.1. Safeguarding arrangements (2012 to 2017)

With the appointment of a Safeguarding Officer in 2012 the safeguarding arrangements evolved and became more robust. Safeguarding training began to be delivered and attendance recorded. Evidence of attendance has been seen by the Reviewers. Those working with children and young people became increasingly aware of safeguarding

policies and procedures from the Diocese. All Sunday school staff were aware and should have attended safeguarding training.

The response to safeguarding concerns does seem to have improved.

There have been some signs of improvement in the relationship between ECW and the Diocese in areas such as representation on the Deanery Synod, but the relationship still remains difficult. Communication between ECW and the Diocese is still not as good as it should be and there is a need for work to be done on both sides to ensure more effective working relationships in safeguarding. This is explored further at the end of this section.

C7.1.1. Timeline of disclosures and response (2017 to present)

For a timeline of disclosures made to ECW and responses please see appendix 3.

C7.2. Response to disclosures and allegations

It is important to state from the outset that there are different perspectives and a difference of opinion around how well ECW responded to the allegations and disclosures post 2017. Participants had a wide range of experiences, varying from wholly positive, a mixed experience of positive and negative and wholly negative.

C7.3. Positive experiences

The vast majority of the current membership of ECW, who participated in the Review, report responses to disclosures and allegations to be positive and protective. These positive experiences have been less common in those who are not current members of ECW.

Participants have talked about the response as being honest, open, supportive, gracious, compassionate, diligent, sensitive, pastoral, proactive and thoughtful. These participants were clear that there had been no attempt at a cover up by ECW. A number of participants felt that the response had been victim focussed. Some spoke of the positives of having a care coordinator, the 'walking with' website and that counselling had been paid for. One participant praised the recognition by ECW of the impact on victims' family and children, even if indirect.

Others have spoken about how technically accurate the response was in relation to safeguarding practice. One participant spoke of how he hadn't been included in an email about the behaviours of JF and an extra effort had been made to take time to meet face to face and talk things through.

There was a recognition among some participants that this had been handled well in difficult circumstances such as the context of JF taking legal advice around libel early on and dealing with some anonymous allegations. Therefore, ECW having to share information that informed those that needed to know, without identifying those who had disclosed.

There was a lot of praise in the interviews for the individual who had to take on the safeguarding lead role at ECW and recognition that she was originally appointed for women's ministry. There were reflections on her commitment to this process, often charting a course in an unprecedented case.

"Trying to do it by the book but trying to work out what the book is, not sure the book has been written for someone like Jonathan".

C7.4. Mixed experiences

It appears that the majority of those who had mixed, or negative, experiences tended to be those who were no longer members of ECW, this was for a variety of reasons. Some

participants spoke of ECW being slow to understand the seriousness of what was being disclosed but then doing everything they could to be transparent and respond well.

Some felt that there was an overreaction by ECW to begin with but then, given time to process and having gone through a number of different emotions, understood why this had to be taken seriously. Others felt that although some mistakes may have been made the intentions were always good and that there was an honesty in the response.

There was also a recognition that more needed to be discussed about any links to John Smyth and links to the Iwerne network. There were a number of participants who felt either too much or too little information was given. This is explored later in this section.

Some participants suggested that the response to disclosures and allegations was influenced by some parts of the wider CE network. There were comments by some that this had been handled as well as it could have been given the cultural lens within parts of the constituency. It was felt that there was a need for recognition, acknowledgement and vulnerability in the response from the constituency as a whole. There was also some frustration that some parts of the wider CE constituency had remained silent and had not passed comment. The reason given for this was that they were waiting for the outcome of the Review.

There has been much positivity around ECW commissioning an independent review in response to the request from the Charity Commission.

C7.5. Negative experiences

Some participants spoke about ECW not having responded well. There was a disappointment from some about the focus on an individual rather than examining the culture. There was a perception of the response being about defending the church.

“my sense is that [Jonathan Fletcher] is seen as a bad apple rather than, in some sense, a product of the system. I feel strongly that the issue concerns the wider culture of this branch of evangelicalism rather than the personal failings of one man, combined, perhaps, with some weak institutions.”

One participant had heard from victims they were supporting that they had felt threatened in their experience of disclosing. Others felt that there had been a pattern of minimising the behaviour of JF especially around the spiritual abuse, bullying, coercion and control, and manipulation.

Some participants highlighted the continuation of letter writing from a number of members of the CE constituency including current role holders at ECW had caused and continue to cause distress due to the control and coercion which they felt was contained within these letters.

C7.6. Management of those victims who have also been involved with behaviour that is harmful towards others

A few participants have raised queries about to what extent they are a co-conspirator or perpetrator of behaviours even though they are a victim themselves. There is a need for some careful thought on a wider level as to how these situations are managed. It is appropriate to risk assess the behaviour, but this must be done in the context of, and with a clear focus of, the person being risk assessed also being a victim. Some further guidance in this area will be useful for the future.

C7.7. Allegations of cover-up

There have been some allegations from some participants of a cover-up. There was a difference of opinion here with some stating that whilst they could understand why people

felt this, there was not a cover-up and that all actions were taken with the best of intentions. It was felt by some that assumptions of knowledge had been made.

C7.8. Deliberate concealing of allegations

In some interviews there was a suggestion that there was a concerted effort to manage and conceal the disclosures. This was partly related to comments that more people perpetrated the behaviour than just JF, with some just recently realising their role in perpetration. There were reports of meetings to discuss how to manage the repercussions. There were also reports of some being told not to speak out as some victims were very vulnerable, others reflected negative views espoused of learning and independent reviews and requests only to share minimum information with the Reviewers. Some felt that there was an inability in the broader constituency to respond effectively and appropriately.

C7.9. Information sharing and communication with the congregation

There were different perspectives on the level of information sharing and communication about the concerns that led to this review, and the appropriateness of this. Some participants felt that there was the right amount of information and some felt there was too much or too little.

Some participants felt that there was too much contact from ECW, feeling that this could just be pastoral care but also querying whether this was a desire to collect information, manage disclosures and control the story or narrative. Some have felt a bit pressured by the contact which led to some emotional health issues. Others felt it was difficult to share with those who were heavily involved in ECW. Some found the communication with ECW damaging and inconsistent.

Some participants would have welcomed a wider discussion and further information. Some felt the information sharing in the wider constituency was useful and that the response to this from organisations in relation to things needing to change was positive.

C7.10. Supporting those where trust has been undermined

There is a need for greater understanding that people will be distrusting of ECW and parts of the wider CE constituency given their past experiences and, in some cases, continued experiences. Counselling and therapy have been made available but there are some who are distrustful of the motives behind this. Similarly, the communication and information sharing will be viewed with some distrust. ECW and the constituency need to ensure they have an understanding not only of the fact that there is distrust but understand why this distrust exists. There needs to be some reflection on the needs of those who have experienced spiritual abuse, coercion and control, manipulation and bullying with ECW and the wider constituency. This can only be done in the context of understanding the impact on the emotional and mental health of those who have experienced these behaviours.

C7.11. Working with the Diocese

Although ECW is a proprietary chapel, it is nonetheless part of the CofE. Therefore, it comes under the House of Bishops' guidance¹² and Diocesan safeguarding policy and procedures. The Diocese therefore has a level of oversight for the safeguarding at ECW. It is clear from the interviews that there was a generally good working relationship with the ECW safeguarding lead and the DSA.

¹² <https://www.churchofengland.org/sites/default/files/2017-11/cofe-policy-statement.pdf>

The Parish Safeguarding Handbook¹³, based on the Promoting A Safer Church guidance, outlines the parish roles and responsibilities for safeguarding and what the parish can expect from the Diocese. This document was published in 2018 by the House of Bishops and there were similar expectations previously. This document in essence outlines the vital relationship that is key for effective safeguarding in the CofE.

The Parish (Vicar and Trustees) are responsible for adoption and implementation of the house of Bishops Safeguarding Policy, the appointment of an appropriately experienced Parish Safeguarding Officer, ensuring safer recruitment is undertaken, responding effectively to concerns, undertaking activity risk assessments and reporting on the effectiveness of safeguarding arrangements to the Leadership and Trustees.

The Parish must report any safeguarding concerns or allegations to the DSA within 24 hours of a concern arising.

The effectiveness of safeguarding arrangements at ECW have improved since 2012 and compliance with the Parish Safeguarding Handbook can be evidenced both in response to allegations and disclosures since 2017 and in relation to wider safeguarding arrangements.

The Diocese is responsible for supporting parishes in implementing the House of Bishops' safeguarding policy and practice guidance, providing safeguarding advice and support to parishes, managing all concerns or allegations against church officers, provision of safeguarding training, providing advice and support on safer recruitment, and the DSA is responsible for the risk assessment of any blemished disclosures.

The Diocese has a group of senior clergy, church officers and external safeguarding professionals, independently chaired by an external safeguarding expert. The group is responsible for overseeing the implementation of policy, training and the effectiveness and quality of safeguarding arrangements.

The Diocese is available for advice and support on whistleblowing. This is when a paid church officer decides to pass on information concerning a wrong-doing, that they consider is in the public interest.

It is clear that action was limited on the first concerns raised about bullying, spiritual abuse, coercion and control (pre 2012). There is a need to ensure that patterns of behaviour around spiritual abuse, coercion and control, bullying and manipulation are picked up at both a parish church level and a diocesan level. These concerns may be lower-level concerns, but it is the pattern of behaviour that is important here. Further thought needs to be given as to how this process of highlighting this type of behaviour is undertaken. Communication and good working relationships between parish church and diocese will be vital to ensure this works effectively. Whilst it is reported that there has been some improvement in the relationship, for example through representation at the diocesan synod, there is still much more needed to rebuild the relationship.

There have been some positives highlighted around the working relationships between key members of staff on both sides.

There were concerns raised by participants that ECW undertook a lot of the safeguarding themselves. These concerns ranged from ECW being allowed to investigate this, the lack of independence within this investigation, through to concerns the Diocese should have had a greater role in investigating. There has been a clear breakdown in the relationship and in communication between ECW and the Diocese. This has impacted on the effectiveness of the safeguarding response. Communication between ECW and the

¹³ <https://www.churchofengland.org/sites/default/files/2019-10/ParishSafeGuardingHandBookAugust2019Web.pdf>

Diocese around safeguarding still needs further effort on both sides. There appears to be limited contact between the safeguarding team and the DSA. It is vital to effective safeguarding and a protective response to disclosures and allegations that there is a full exchange of all information available. At times this does not seem to have happened and both parties need to reflect on the reasons for this. It is necessary that both parties feel that they can follow up advice and actions and be able to challenge well and disagree in a way that does not undermine future working relationships.

If the relationship and communication is to improve between ECW and the Diocese, there is likely to be a need for some mediation. It has become apparent in the course of this Review that a good working relationship between church and diocese is absolutely essential in maintaining effective safeguarding. The CofE should consider developing a process to highlight where there is a difficulty in relationship between a church and a diocese and to be able to provide mediation at an early stage to prevent the further breakdown of that relationship.

There has been some confusion about the Diocese's response/non-response to some of the information shared. It has been unclear who is responsible for what at certain stages of the safeguarding process. Issues around proprietary chapel status, ECW's independence and a mutual distrust in working relationships have all contributed to this. This lack of clarity still continues. Advice has been taken by ECW from the Diocese, but not always agreed with, and therefore on occasion action has been taken that was not in line with advice of the Diocese..

Some role holders at ECW have felt unsupported and talked about a defensive stance from the CofE and the Diocese. Some role holders talked about the system not being equipped for a case of this profile, complexity and significant history of abuse. This has all meant that an effective response across the Church of England safeguarding structures has been undermined and therefore less protective.

C7.11.1. Information Disclosure Request

A request was made within the interviews from the Reviewers to have access (recognising some materials needed to be redacted) to correspondence between ECW and the Diocese and between the Diocese and the NST. This request for information was sent to the Diocese of Southwark and the NST and included:

- All Core Group minutes relating to Jonathan Fletcher.
- Correspondence from ECW detailing concerns about support from the Diocese of Southwark.
- All information that was shared with ECW concerning the removal of Jonathan Fletcher's Permission to Officiate (PTO) including any correspondence from the Bishop's office to ECW.
- All correspondence regarding the clergy risk assessment of Jonathan Fletcher, including his response to the risk assessment process and outcome.
- Letter from Jonathan Fletcher to Bishop Christopher concerning his resignation from Holy Orders.
- Any correspondence, notes or further documentation related to the Clergy Discipline Measure (CDM) process concerning Jonathan Fletcher.
- Correspondence from Jonathan Fletcher regarding any response to the Clergy Discipline Measure.

On 20 October 2020 a letter was received from the Diocese stating that the information request did not meet the necessity test in order to share this information on a lawful basis.

“The lessons learned exercise that you are carrying out was commissioned by Emmanuel Church Wimbledon and is quite properly focusing on the actions taken by that church and its local culture. For this reason it has sadly not been possible for us to conclude that the necessity test is made out for the release of the material you request. The problem is that materials that have never been (and as a matter of normal process would never have been) held by Emmanuel Church Wimbledon cannot be relevant to your analysis of that church’s response to the concerns surrounding JF. Regretfully, we therefore do not consider that we would have a lawful basis for sharing the data under GDPR.”

A further email was sent to the Diocese clarifying the areas of scope that met the necessity test. In response the Diocese reviewed their decision and provided some relevant documents to meet the Information Disclosure Request as outlined above.

C7.11.2. Core Group working

Every safeguarding concern or allegation involving a church officer should be managed by a defined Core Group, convened for the specific situation. The purpose of the Core Group is to oversee and manage the response to a safeguarding concern or allegation in line with House of Bishops’ policy and practice guidance, ensuring that the rights of the victim/survivor and the respondent to a fair and thorough investigation can be preserved.

A Core Group meeting was held on 1st October 2018. This meeting was attended by representatives of NST and Diocese of Southwark.

From the 5th June 2019 to 2nd October 2019 the Core Group was attended by ECW representatives, representatives from the Diocese of Southwark, representatives from Lambeth Palace and was chaired by a senior manager from the NST.

The Reviewers have reviewed all documentation provided regarding the Core Group and have seen evidence that this Core Group process and ECW participation within this process was compliant with guidance from the House of Bishops.¹⁴

The Core Group of the 5th June 2019 recommended a worship agreement for JF within the church he is attending as an outcome.

The Core Group also assisted ECW in making a Serious Incident Report to the Charity Commission.

C7.11.3. Clergy Discipline Measure (CDM)

The Core Group agreed that a Clergy Discipline Measure (CDM) should be submitted on the grounds of conduct unbecoming to a clerk in Holy Orders.

The Clergy Discipline Measure 2003¹⁵ (Amended 2016)¹⁶ which came fully into force on 1st January 2006, provides a structure for dealing efficiently and fairly with formal complaints of misconduct against members of the clergy, other than in relation to matters involving doctrine, ritual or ceremonial. All those admitted to Holy Orders in the Church of England are covered by the Measure, whether or not in active ministry.

The CDM is not a basic complaints procedure. This process is for responding to allegations of serious misconduct by clergy.

¹⁴ [1] <https://www.churchofengland.org/sites/default/files/2019-10/ParishSafeGuardingHandBookAugust2019Web.pdf>

¹⁵ <https://www.legislation.gov.uk/ukcm/2003/3/contents>

¹⁶ <https://www.legislation.gov.uk/uksi/2016/848/made>

Documentation seen by the Reviewers evidence that there was a request from JF to resign his Holy Orders. This request was made as the CDM process was beginning. As a CDM had begun JF was informed that this request could not be processed due to the ongoing CDM process.

There is a formal process for a resignation of Holy Orders to be requested. The Reviewers have not seen evidence that this request has been completed. This is an important outstanding issue that may have a bearing on some of the findings and recommendations of this review.

C7.11.4. Outcome of the CDM

The outcome of the CDM was not contested by JF and therefore no tribunal was held. There is therefore no public record of the CDM or the specific details of the complaint.

A spokesperson for the Diocese of Southwark confirmed that following a complaint made under the Clergy Discipline Measure, the Revd Jonathan Fletcher accepted a penalty by consent of prohibition from ministry for ten years. This means that his name is added to the Archbishop's List which includes details of those who are not allowed to minister within the CofE. After the period of prohibition, there is no automatic return to ministry.

The penalty here, whilst a limited prohibition for ten years, is a lengthy prohibition from ministry and reflects the seriousness of the allegations made within the complaint. At the age of 77 (age when penalty by consent agreed) this effectively means JF is unlikely to officiate again and, if he wishes to do so, there will be a need to reassess his suitability for ministry at the end of this prohibition period.

C7.11.5. Risk Assessment and Worship Agreement

A risk assessment was undertaken regarding JF's attendance at Church of England churches. The outcome of the risk assessment was that there was a need for a safeguarding agreement/worship agreement wherever he were to attend church. There have been difficulties in engaging JF with the worship agreement and his compliance with this agreement has been questioned.

Participants from the Diocese and NST expressed concern regarding JF's understanding of the seriousness and consequences of his behaviour. There is a clear narrative from JF regarding people speaking about him rather than to him. In the statement made at the EMA conference on 27th June 2019, reference was made to the seriousness of the situation and that pastoral care was being provided to JF¹⁷.

C7.12. An NST case?

A further issue in terms of safeguarding response is the role of the NST. Interviews were held with current and former members of the NST. The process encountered was difficult to navigate with the Reviewers being directed to different past and current members of the NST and finding it difficult to obtain clear answers on how and why decisions related to this case were made. The Reviewers can only reflect on how challenging this process must be for victims of abuse and how difficult it will be to navigate, especially having experienced harm.

¹⁷ Extract from the statement made to the EMA Conference (27.06.19): 'You may well be concerned for Jonathan. The last few months will have been very difficult for him and the coming weeks may be more difficult still. Sadly, it seems he has not yet accepted the seriousness of the situation, despite the efforts of a number of senior evangelical leaders, who have sought to engage with him. If you are a friend of Jonathan, you may well be wondering how you should relate to him going forward. There is no one answer to that question. It is not for me or anyone else to tell you what to do. There are some who have taken responsibility to care pastorally for Jonathan in the weeks ahead'.

As outlined in the previous paragraphs there are 3 levels of response within the CofE Safeguarding Structure - Parish Church, Diocese and National Safeguarding Team (NST). The Parish Church is expected to pass safeguarding concerns to the Diocese within 24 hours. The Diocese should offer advice and support in how to respond well and manage any allegations against a church officer. Where a case is high profile or involves a number of dioceses, there is a need for a co-ordinated and skilled management of the case due to its complexity. Such cases should then be referred to the NST. The NST then follow a decision-making process and reach a conclusion about whether the case should become an NST case.

The criteria for a particular matter to become an NST case is where a church officer is of high status, a bishop, a dean, an archdeacon or where the clergy or church officer has a high profile. Given the acknowledged high profile and influence JF held and the existing media interest in this case, it was surprising to the Reviewers that this did not become an NST case. When the Reviewers asked for the rationale for this decision, the only clear answer was that it was felt the Diocese could manage the case well. It was suggested by one participant that "on a different day the decision could have been that it should have become an NST case". As part of the Information Disclosure Request (as outlined in C 7.11.1 above), the Reviewers asked for the records of this decision-making process, but were informed that there was no case management system in place and that records were unlikely to have been made.

The NST responded to provide a range of information held that met the legitimate interest test. This information included core group minutes, agenda and action points.

C7.13. Accessing external safeguarding support and information sharing

Although ECW is a proprietary chapel, it is nonetheless part of the CofE. Therefore, it comes under the House of Bishops' safeguarding guidance and diocesan safeguarding policy and procedures. The Diocese therefore has a level of oversight for safeguarding at ECW. It is clear from the interviews that there was a generally good working relationship with the ECW safeguarding lead and the DSA. However, there is also clear tension around the advice given by the Diocese about this case and the action ECW felt to be appropriate around when and how to share information.

Given the complexities of this case, and the lack of road map, ECW sought external safeguarding advice around this from an individual holding a safeguarding role at another Church. Whilst it is good practice to obtain external insight where needed, there should be a clear agreement in place about information sharing in these circumstances. There was no formal agreement established for the inclusion of this individual in the safeguarding team at ECW.

The Reviewers were concerned at the time that some details of victims were shared with this individual, albeit that ECW considered them to be part of the internal safeguarding team. Although the reviewers have not since had the opportunity to inspect precisely what information was shared with this individual, ECW has confirmed to the Reviewers that – while the level of detail was quite extensive – the actual identities of individuals were "pseudonymised". The Reviewers understand this to mean it was subject to a process of de-identification whereby a person without direct knowledge of the case would not be able to identify the individuals personally. Nevertheless, the Reviewers were concerned at the time that these individuals had not been informed that their information had been shared with this third party, even in pseudonymised form. In the process of the Review, this concern was therefore raised as a potential data breach and safeguarding concern.

In exercising appropriate duty of care, this scenario was presented as an anonymous case to the ICO, who suggested this would not constitute a data breach but was potentially an unlawful disclosure. ECW were informed of this outcome and were asked to respond. ECW sought legal advice and responded stating that they were certain that identifying information had not been shared and they had followed best practice in seeking external support.

Following this exchange, the Reviewers considered the response and remained concerned that the victims (about whom the information was shared) were unaware that even pseudonymised information had been shared with a third party. Adhering to the principles of best practice for data protection¹⁸, a request was made that ECW should make direct contact with the individuals concerned, prior to the publication of this report. The Reviewers asked that victims were informed what information had been shared, when it had been shared and, importantly, with whom it had been shared. The reviewers were concerned that participants did not learn of this for the first time by reading the Review.

C7.14. Independent support and advice

A number of participants spoke of the need for ECW to have sought independent help and support earlier. Some spoke of not seeking help and support being part of the public-school culture, thinking that they can fix this, and this was part of the culture of the church.

It was highlighted that where there are complex, high-profile situations, there is a need for independent safeguarding advice. Where organisations are more independent, there needs to be clarity around who investigates allegations as there is potential for there to be conflicts of interest. There was a recognition that not having independent support early enough left ECW in a difficult position. However, where support is sought it must be independent and contracted. There is not a roadmap or guidance for dealing with cases such as this. There is a CofE practice guidance document on responding to, assessing and managing safeguarding concerns or allegations against church officers. This does not cover aspects such as managing the media, dealing with litigious situations or where there are inter-diocesan issues or a wide scope of influence. There is a need for further guidance to give clarity around the roles and responsibilities of parish churches, Diocese and NST in investigating and managing cases of this nature. This needs to include clarity around the roles of those more independent organisations such as proprietary chapels, cathedrals and royal peculiars. All parties should be clear of the expectations and limitations of their roles and responsibilities in the management of cases such as this. It is recommended that the practice guidance of the CofE is reviewed to take into account the learning of this case and that the necessary revisions and additions to the practice guidance are made.

“The entire system is broken, it is not geared up to address an issue involving someone with a national profile who has a significant history of abuse”.

Some participants felt there should be an entirely independent body to investigate and manage complex cases. Others raised the need for independent support services for those who have been affected by their experiences as they felt that there were some who would not take up support directly from the organisation where the harm had been caused. Even though support and counselling are offered anonymously there is still a reluctance to engage with the organisation where the harm occurred due to an understandable mistrust of motives from the experiences the people have had previously.

¹⁸ The 7 Best Practice Principles for Data Protection - Information Commissioners Office: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/>

C7.15. Impact on church relationships

The Reviewers spoke to a large number of people and many of those remain members of ECW. It is very clear that there are a wide range of perspectives on the behaviour of JF, the response from ECW and the response from the wider conservative evangelical community. These perspectives have shifted for many over time as they have had time to process what has happened.

These different perspectives have caused difficulties in church relationships and between ECW and past members. Some participants spoke of a divided community. It is really important for there to be recognition that whatever perspective is held and wherever anyone is on the journey of processing and recovering from their experiences, there has been a great deal of hurt. Trust has been undermined and some participants have spoken about once solid foundations now feeling like shifting sands or quicksand. It is important to recognise that, for those that have experienced JF's behaviour, in any of the forms this has taken, the journey of processing and beginning to heal has been, and continues to be, a long journey. The Reviewers have experienced people moving on their journey during the interviews and have ensured that the emotional health of every participant is maintained and that every participant has had access to support if needed. For those who have only had positive experiences of JF the processing of these negative experiences reported by others has been difficult and often painful.

It is recommended that consideration is given to how these many different perspectives, different stages of processing and different opinions can all be supported within the pastoral care for members within ECW, the relationships within the CE constituency and relationships with those outside this network. There is a need to consider what support, ideally independent, is available to everyone affected by JF's behaviour and the response that there has been to these behaviours. It must be recognised that the publication of this report may lead to further division and will increase the need for support for some.

However, of paramount importance is a victim-focused response and prioritising the needs of victims.

C7.16. Impact on those who have been dealing with disclosures and safeguarding plus continued behaviour from JF

Some participants also spoke of the impact on those who have had to lead the response to this. Some spoke of harsh judgements being made about responses. Others spoke of fear around raising concerns about JF's behaviour and reporting these on due to the charisma, high-profile and influence of JF. What is really clear is that dealing with this has a huge impact on the emotional health of those responding to this situation.

Some participants spoke of seeing those responding bullied and of the difficulties of managing the ongoing behaviour of JF. This has caused enormous strain and has had a profound impact on all those who have responded to this situation. Participants spoke of how whatever action was taken, someone would disagree with it. This left those responding feeling that whatever they did wasn't right.

There is a need for some reflection on support that is given to those who are responding to situations such as this. A protective response also needs to protect those leading the response.

Summary

There are positive aspects of the response by ECW. However, in the context of JF's behaviour towards those responding, both historically and continuing, this has been made difficult.

The situation has been made more complex by JF's continued behaviour including the use of power and influence to critique and undermine his successor's ministry, poor working relationships and mistrust between ECW and the Diocese. A lack of clarity around roles and responsibilities especially in relation to proprietary chapels, and the lack of a case management system within the NST and importantly a lack of victim focused response are also contributory factors. There are clear lessons to be learned and these are picked up in sections 9 & 10.

C8. What additional steps have already been taken to improve ECW's processes, culture, etc to mitigate any risk of repetition of such events or similar?

There does need to be a recognition that ECW have undertaken a significant amount of work to improve safeguarding, HR processes, accountability, leadership style and the culture as a whole. A high number of participants have recognised this work.

C8.1. Improvements to the culture at ECW

C8.1.1. Leadership, governance and accountability

There is a recognition by many participants that the culture at ECW is much healthier now. Some spoke of a huge cultural change and spoke of the current Vicar's different leadership style being more collaborative and pastoral. Church leadership is more representative of the congregation.

The leadership is more pluralistic with the appointment of an Eldership. Some participants spoke of Elders not being deferential to the Vicar. This brings a greater accountability. The culture has been described as much more discursive, that Trustees meet with the Vicar to give regular advice. For some participants this means there is more listening and pastoral openness. The teaching is now focussed on faith, not fear. It was highlighted that there was still work to do, but that there was ongoing improvement in the teaching at ECW.

"With the introduction of the eldership there is now a more collaborative approach to decision making for which we are humbly grateful. We have had to give our minds to the way this sits within the traditional model for governance within the C of E - but it means much more listening and pastoral openness."

Some participants raised the importance of a greater transparency in the appointment of Elders, Church Wardens and those who hold people accountable. They talked about the importance of having people who will challenge and the dangers that occur if this is not the case. There was a recognition of the importance of accountability and that this had improved at ECW and was much more effective. There is now an emphasis on the importance of each person to the church. A Care Co-ordinator has been appointed to ensure that everyone is cared for.

These changes to culture had begun prior to the extent of JF's behaviour being fully known. When these behaviours became fully known it was clear to everyone that things needed to change.

There is a recognition among participants that although there have been significant changes in the culture, there are still areas for improvement, and there is a lot in progress. There is also a recognition that changing culture takes time and much effort. There is

some concern that changes need to be initiated by much deeper reflections on ideologies and assumptions about culture and leadership. There is a need to ensure the consistency of accountability in all roles and to ensure accountability and support was prioritised. It was felt that a huge amount had been put in place to mitigate the risk of something similar happening again. The remaining actions needed were talked about as minor tweaks that were needed to give even greater confidence that risk had been mitigated as much as it could be.

“A lot is in progress, not sure all has been effected but definitely on the right road, would like to see some progress at greater pace- we are turning the world around as it were – doesn’t happen on the spot, right people in right roles.”

ECW need to ensure that there is clarity across the board about who is responsible and accountable for what.

An improvement in external accountability to the Diocese was spoken of. The Vicar collaborates with the Bishop and the Diocese. There has been collaborative work to plant a church. It is important to note that all recommendations made for ECW in this report apply to all plants and ministries originating from ECW. There is, however, a need for continued and intentional work to improve the relationship with the Diocese, especially given the need for genuinely independent and external accountability. The necessary improvement to the relationship between ECW and the Diocese is covered in greater detail later in the section.

C8.1.2. Attempts to widen diversity at ECW

There has been an attempt to move away from the public-school culture, but there is recognition that this still remains to an extent.

Participants raised that Elders should be elected and that there should be more transparency in the process. There was a recognition by some participants that there are more Elders and that they are more representative than in previous elderships.

C8.1.3. Openness to critique, challenge, transparency and ability to question

There does appear to be increased openness to challenge, an increased transparency and opportunities to question. Participants reported church family meetings 3 times a year which allow an opportunity to ask questions, an open house every bank holiday Monday which is open to all and teaching from the front to help people understand what has happened and where things went wrong. There is a recognition that this could happen again as it could in other contexts, as abuse can occur even where processes, policy and practice have been developed.

The Reviewers have found that all participants have, in the majority, interacted with the Review in an open, honest and transparent way. One role holder was keen to ensure that ECW had got things right and urged the Reviewers that if this isn’t the case ECW will put right what they need to put right.

“We need to make sure have we got things right and if not please tell us and we will put right what we need to put right.”

The seeking of independent support and ensuring the independence of the Review process suggests that ECW is keen to learn and reflect both on painful history and the necessary actions to ensure a healthier Christian culture in future. However, the recommendations must be clearly and openly actioned for this to occur.

C8.1.4. Role of women in ECW

There have been appointments of women to a number of key roles in ECW since 2012. The only thing that is male-only now is the Eldership. There is a female Church Warden, Chair of Trustees and other female Trustees and church council members. It has been seen by many as positive that women are now more involved in the life of ECW,

“the only thing that is male only – eldership – almost everything else have we got women with right skills set we can encourage to be warden, trustee etc – have we got the balance? – women Chair of Trustees and Church Warden, been on church council. Already got couple very able women on trustee side. That side is really encouraging and going in the right direction – noticeable how much easier it is when women on trustees and different perspectives and people women think they can talk to. Some very able women.”

However, continued reflection on the role and value of women within this context must be actively engaged with as a number of participants raised concerns about the perception and valuing of women in the context.

C8.1.5. Culture in a process of change

There has been a recognition amongst participants that the culture is still changing and there is still a division of opinion in the congregation of ECW. It was recognised that people are still processing what has happened at ECW and the response to this.

It is important to recognise that not all have found the changes at ECW positive; some reflected more positively on ways of operating from the past and some strongly disagree with the changes. This can be expected, as the culture of ECW has been established for a long time and change is both challenging and complex.

The importance of communicating the changes well was discussed by participants with a recognition that they had not always got this right, but that communication was improving.

C8.2. HR policies and procedures

It is really important to note that there has been deeply significant progress made regarding HR processes and policies. This was clearly evidenced in the Safeguarding Audit, but participants also spoke to the improvements made. A review of the existing contracts was undertaken by Elders and these were found to be fairly simplistic where they existed. ECW now has employment lawyers and there are clear template contracts. Contracts are now in place for all staff, all staff have job descriptions and have access to the staff handbook that outlines a wide range of HR policies and processes. This handbook has recently been revised and evidence was seen that these were communicated to all staff.

There are clear grievance processes, complaints processes and whistleblowing procedures. This has all added to the feeling of security in role and make it more likely that concerns will be raised. A HR committee has been formed to ensure HR remains a focus.

“Now Elders have developed a staff handbook, HR policies, polices for management of staff – this has come in last 3 years. We have HR lawyer who gives advice on anything we did in terms of contracts.”

An appraisal system was created but has taken some time to be accepted. There had been an assumption that this would be a critical process and it needed to be communicated that this was a supportive process to ensure that staff had everything they needed to meet their objectives. This appraisal system is undertaken by the Elders and gives an opportunity to talk outside staff meetings.

It is important that the Elders continue to ensure that all staff fully engage with the appraisal process and ensure that the messages about this being a supportive mechanism continue to be communicated. A desire has been expressed by some Elders to move to a 360-degree appraisal system that takes feedback from congregation, colleagues and Elders but there is a recognition that there will be challenges in implementing this at the current time. Elders currently serve a 3-year term and this can be renewed for a further 3 years, after this they must stand down. ECW have instigated this policy to ensure a rotation of Elders.

C8.3. Improved safeguarding (Summary of audit) – For summary of outstanding actions based on the audit see the action plan in the audit

A high number of participants spoke of the improvements that had been made to safeguarding. The safeguarding audit has corroborated this and seen evidence of improved safeguarding arrangements.

There was a crucial point made by some participants that policy and procedure are only any use if they are used and this requires a culture that values safeguarding. It is important to have rigorous safeguarding policies and procedures, but these do not offer full protection and some commented that it may not be possible to find a system that does this.

“You can bring in policy and guidance and training but this can only go so far but if you don’t get people engaging in safeguarding and you don’t get people understanding the theology of this and it being part of the gospel you won’t get anywhere.”

C8.3.1. Safeguarding policy

There is a clear line of accountability from trustee level to leadership and PSO around safeguarding. There are some further improvements that could be made regarding the openness and transparency of appointment of Elders. Safeguarding is clearly on the agenda at a number of levels. All levels of the leadership demonstrated familiarity with the safeguarding policy and who to seek advice from if necessary. There is an intentionality around ensuring safeguarding is on the agenda, albeit with a recognition that there is more work to do and lessons to be learned from this Review.

C8.3.2. Safeguarding training and awareness

ECW is proactive in ensuring all leaders, workers and volunteers are trained to the appropriate levels through the Diocese of Southwark safeguarding training. This is delivered through a framework of equality and inclusion and recognises the vulnerability of certain groups.

Training attendance is monitored through the Klemi database and there is a system for flagging up when refresher training is due. PSO details are clearly displayed on the safeguarding noticeboard and on the website.

C8.3.3. Safer recruitment

There is a clear safer recruitment process for employed staff and evidence has been seen of this. The volunteer safer recruitment is being further developed. It may be useful to consider a monitoring and recording process for both paid and voluntary roles to ensure that each stage of the safer recruitment process is undertaken and can be evidenced. Continued further development of the safer recruitment process would be useful in relation to volunteers. ECW should ensure this includes volunteer role profiles, some form of informal interview before beginning role, DBS where appropriate and in line with DBS

guidance, probationary periods for those volunteering to ensure role is a best fit for everyone, and volunteers are suitable for their role.

C8.3.4. Management of workers

Overall, there was evidence that there is clear policy and practice around working safely.

The appraisal system is a really positive step forward, but ECW should ensure that all staff are fully committed to this process. ECW should consider whether they wish to make this mandatory for all employees. At the very least, the benefits of the support given in the appraisal process should be communicated to all employees.

There are clear procedures for dealing with allegations against a worker and these ensure that children, young people, and adults with care and support needs are safeguarded, that the worker is supported, and that appropriate action is taken.

There are clear whistleblowing policies and grievance policies within the staff handbook. This has been recently revised and has been circulated to all employees. Evidence has been seen of this process.

Every member of staff is given an exit interview. This is excellent practice.

C8.3.5. Working safely

Safe Church 2020 provides detailed guidance on working safely. Through interviews held with role holders it has been demonstrated that there is a wide knowledge of this guidance and that this has been applied to the ECW context. In addition, the HR handbook provides further guidance for employees. Evidence has been seen of a wide range of comprehensive and high-quality risk assessments for a variety of internal and external activities. The complaints process ends with the Trustees. There should be some consideration given to whether an external final stage of complaints process is needed.

There are a number of areas where improvements would add to the already effective working safely practice. See the action plan in the safeguarding audit for further details.

C8.3.6. Communicating safely

The safeguarding message is communicated to the members by the safeguarding display board and on the website. There is clear guidance regarding safe communication through ICT. Role holders demonstrated a knowledge of these principles and practices.

Whilst there was a clearly demonstrated knowledge of how to deal with a disclosure there is a need for the relationship with the Diocese to be rebuilt and further developed. The relationship with the Diocese has been historically poor. There is evidence that there are still barriers in communication between ECW and the Diocese.

The processes for gaining feedback and involving members of ECW do seem to be in place. There is a recognition that healthy Christian cultures extend beyond the role holders and volunteers.

C8.3.7. Responding to concerns

A high level of training is evident and evidenced through Klemi. The knowledge was evidenced as applied through the role holders that were spoken to. The safeguarding officers were very knowledgeable about how to respond in each situation.

It is recommended that where external advice is sought, that there is a formal process of commissioning and that this process includes a formal information sharing agreement. Where information is being shared, even on a non-identifying basis, the person whose

information is being shared should be informed what information will be shared and with whom in line with the information sharing agreement for the purpose of seeking advice.

C8.3.8. Pastoral care

No counselling is undertaken by ECW. Where pastoral care is given this is delivered safely, sensitively and in line with guidance.

C8.3.9. Managing those who may pose a risk.

There was a high level of knowledge here and all those spoken to were clear where ECW was responsible and where the Diocese was responsible. However, the effectiveness of safeguarding here is reliant on a good working relationship, which reinforces the need for further work to be undertaken to improve the relationship between ECW and the Diocese.

C8.3.10. Working in partnership

Those that are funded through ECW to undertake mission work must do so with a professional mission organisation. There is a committee that looks at funding and undertakes due diligence. The duty of care should be revisited where a risk assessment is undertaken on an individual. If a funded individual is a victim of JF's behaviours, then the duty of care should also examine what support that individual needs. Support and advice should be sought from the Diocese on these matters. Wherever there is new information that comes to light this should be included in the risk assessment.

The ECW committee for mission funding should reassure itself that due diligence checks have been undertaken and it's duty of care discharged for any mission partner that is funded. This reassurance should ensure:

- That professional mission organisations that are used have adequate safeguarding policies and practice.
- That this includes an awareness of different laws and cultures.
- That any risk associated with mission partners is assessed and revisited in response to any new information.
- That there is an assessment of support needed if that person has been affected by the behaviour of JF.

It would be prudent for ECW check that all funded mission agencies have a safeguarding policy in place and agree to report any concerns of a safeguarding matter. Further they should be aware of the differences in law, culture etc in the countries they work in. A review of what emotional health support is available for any mission partner would also be wise.

There are two organisations that hire premises from ECW. The expectation is that if they do not have a safeguarding policy, they abide by ECW policy.

C8.3.11. Recent concerns about cultural change

Near to the completion of the Review, there was a sermon reported to the Reviewers given on 17 January 2021 to ECW, which contained direct reference to the Review process. There are dangers in seeking to address such ongoing and complex matters from the pulpit. The Reviewers consider this sermon was ill-advised as this message seems to indicate impression management prior to the publication of the independent Review. ECW did not have any knowledge of the Review findings when the sermon was preached. The link to scripture and the use of the sermon to give these messages is concerning because it is not indicative of deep cultural change that is required to address the issues identified in the report.

Summary

There has been significant progress made in addressing the historical shortcomings in the culture, accountability and safeguarding arrangements. However, a recent sermon is concerning in terms of evidencing cultural change. There is still further development needed in some areas and these are reflected both in the lessons learned section and in the action plan section of the safeguarding audit.

It is vital that ECW continue to consider the role of culture in ensuring people fully engage with safeguarding arrangements and to address any negative perceptions of safeguarding still in existence.

C9. What lessons need to be learned by ECW, and what measures still need to be implemented to help prevent such abusive incidences from re-occurring, and how are these supported by current policies and procedures?

In addition to the findings already detailed in Section C1-C8 above, the response to this section of the scope can be found within the conclusions (Section D) and recommendations specifically for ECW (Section E, recommendations 1-28). It is important that these are read in full in order to ensure all the lessons from the Review are reflected upon and implemented in practice.

Where recommendations apply to ECW, these relate to all ministries of ECW and any church plants associated with it.

Additionally, all recommendations in the safeguarding audit action plan should be addressed and further consideration should be given to the implementation of relevant learning from the remaining conclusions and recommendations that relate to organisations outside of ECW (recommendations 29-66).

C9.1. Continual cultural change

It is recognised that ECW have made significant steps to addressing cultural issues since the disclosures occurred however concerns remain about some persistent aspects of culture. ECW need to continue to reflect on the cultural elements described in sections 1-4 that allowed behaviour to occur and not be disclosed. Changing culture is a lengthy process.

C10. What opportunities there are for wider learning for organisations beyond ECW.

In addition to the findings already detailed in Section C1-C8 above, the response to this section of the scope can be found in the conclusions (Section D) and recommendations specifically for organisations beyond ECW (Section E, recommendations 29-66). It is important that these are read in full in order to ensure all the lessons from the Review are reflected upon and implemented in practice.

Where recommendations apply to ECW, these relate to all ministries of ECW and any church plants associated with it. They will also carry valuable learning for other organisations outside of ECW.

Section D: Conclusions

Impact of harmful behaviours

From the evidence-gathering process of this Review, it is clear that JF engaged in a range of harmful behaviours that have been experienced by a number of people, through demonstrative accounts including a serious sexual act performed in front of another person, spiritual abuse, bullying, coercion and control, naked massages and saunas, and forfeits including smacking with a gym shoe and ice baths. The impact of these behaviours on a number of individuals has understandably caused great harm and many will live with this impact in the long-term.

Whether or not these behaviours were deemed to be consensual, the Reviewers conclude that the behaviours are completely unacceptable for someone in a position of spiritual authority and constitute an abuse of spiritual authority and power, falling far short of the expectations, obligations and duties of those in Holy Orders. Further, they evidence significant and ongoing safeguarding concerns around JF's relationships and any mentoring or ministerial activities. The Reviewers recognise that PTO has been removed but there is a need for clarity that the significant and ongoing safeguarding concerns relate to all aspects of Christian influence ministry including personal work, pastoral care and mentoring.

On the balance of evidence, the Reviewers can only conclude that the spiritually abusive/bullying behaviours were in plain sight and some were reported to leadership within ECW prior to 2017. The massage and saunas were also not hidden behaviours. The forfeit behaviour was reported to include role holders, but these reports are not from the individuals themselves. On the balance of evidence, at least some of these behaviours were known about prior to 2017 and there were opportunities for action to have taken place sooner. However, there is also evidence of shock at the revelations of behaviour and the reviewers do not doubt that many were unaware of the abusive behaviours. This is common in other cases of abuse, where it can be hidden in plain sight.

As regards the behaviour of a sexual nature, the evidence suggests very few, if any knew about this prior to 2017.

Disclosures and Allegations

The interviews demonstrated a number of factors related to the delay in abusive behaviours coming to light, these include JF's character and behaviour, protecting the gospel, assumptions of homogeneity, lack of shared understanding about behaviours experienced by some as bullying or spiritually abusive, normalisation, fear and a lack of an external body to disclose to. This led to a situation where it could seem wrong to disclose at all, where individuals could feel shame and guilt, and where it was important to protect both JF and the wider ministry he was part of.

The cultural context

The examination of cultural elements of ECW gives an insight into how abuse could occur and not be disclosed. ECW was perceived by some as a very successful church, as the congregation grew significantly in number and profile. It was a place which became and remains a family to many. It also offering a home to those who wanted to explore Christianity intellectually. It undoubtedly provided solely positive experiences of church life for many who attended. However, for others, experiences were harmful and abusive. We therefore question whether a church can be defined as entirely successful given the information gathered around the harmful behaviour of JF that occurred within the church, and the aspects of unhealthy culture that have been experienced by many.

One of the key factors underpinning this is ECW as interconnected whilst simultaneously independent. The evidence has illustrated that the combination of JF's personality and influence within and beyond ECW created a situation in which he held relational and institutional power. This enabled behaviours to occur and be unlikely to be identified as harmful. If behaviours were identified as harmful, they were unlikely to be disclosed and, until recently, unlikely to be actioned. It is important to note that JF was, and is, responsible for his behaviour and decisions made whilst holding a ministerial position. An examination of culture does not negate personal responsibility.

It is the opinion of many participants and the reviewers, that JF's behaviour occurred in a context and constituency in which 'leadership on a pedestal' was prized and the culture of ECW and the wider community in some ways enabled the behaviours to occur without scrutiny. It also facilitated a context in which disclosures could be minimised with rationales of protecting the gospel, protecting JF, protecting Iwerne, protecting the wider constituency and protecting the successes that had been achieved.

Permission to Officiate

Due to the confusion over the removal of PTO, JF was able to continue to have an influence on the constituency and, to some extent, on ECW. Due to ongoing relationships with those at ECW and the proximity of his residence, it is argued that he had some ongoing influence at ECW after 2012. A review of the evidence shows a clear need for the PTO removal process to be reconsidered, with clear guidance in place especially about what constitutes ministry. Clear thought needs to be given to information sharing processes around removal of PTO to enable vicars to avoid allowing someone with PTO removed to minister within their church.

Policy and practice frameworks

There were a large number of factors around policy, procedure and process for reporting abuse at ECW that prevented earlier disclosure or action being taken. There was a distinct lack of policy, process and procedure. In addition, a celebration of informality, a lack of recording or confidentiality and the lack of value placed on safeguarding undermined confidence in being able to disclose or raise concerns. There was a lack of HR processes and procedures around contracts/ statement of particulars, staff handbook and grievance and whistleblowing procedures. This, combined with JF's influence on careers and the culture of ECW, led to a situation in which it was difficult to disclose, raise concerns or respond appropriately to concerns that were raised.

Accountability

Whilst there were internal and external accountability structures, it is deeply significant that a number of participants suggested they were ineffective. The fact that structures were in place, but ineffective, led to a perception or a presentation of accountability that meant this lack of effective accountability was never challenged. The relationship with the Diocese and the othering and undermining of the Diocese due to theological differences meant that concerns would be unlikely to be raised with the Diocese.

Evidence indicates that if you needed to raise a concern about JF at ECW this would have been deeply difficult. The only means of raising a concern about JF would be to raise this directly with JF or challenge him regarding his behaviour and many were concerned about the consequences of this. The alternative was to raise this with someone who was deferential to JF; this information was likely to be referred to JF and there would be similar consequences. To take the concern to the Diocese would also be deeply complex. The evidence suggests, people were left in a position which effectively silences them and left a void in which concerns could not really be raised, taken seriously or actioned.

Progress to date

There is evidence that responses to this situation by ECW do appear to have been undertaken with the best of intentions. However, in the context of JF's behaviour towards those responding, both historically and continuing, this has often been made difficult. The situation has been made more complex by aspects of JF's continued behaviour involving the use of power and influence to critique and undermine his successor's ministry, poor working relationships and mistrust between ECW and the Diocese, a lack of clarity around roles and responsibilities especially in relation to proprietary chapels, the lack of a case management system within the NST and importantly a lack of victim focused response. There are clear lessons to be learned and these are picked up throughout and detailed within the recommendations.

There has been significant progress made in addressing the historical shortcomings in the culture, accountability and safeguarding arrangements. There is still further development needed in some areas and these are reflected both in the lessons learned section and in the action plan section of the safeguarding audit. It is vital that ECW continue to consider the role of culture in ensuring people fully engage with safeguarding arrangements and to address any negative perceptions of safeguarding still in existence.

It is recognised that ECW have made significant steps to addressing cultural issues since the disclosures occurred however concerns remain about some persistent aspects of culture. ECW need to continue to reflect on the cultural elements described in sections 1-4 that allowed behaviour to occur and not be disclosed. Changing culture is a lengthy process.

If these aspects of unhealthy culture are not fully addressed then it is likely that any learning and improvement from the implementation of recommendations will be limited in its effectiveness. There also needs to be reflection on the impact of external cultures on these aspects of unhealthy culture at ECW.

Section E: Thematic Recommendations

Given the findings of the review, and in particular the recognition of there being insufficient and protective accountability both internally and externally, there is potential for these recommendations to not be fully actioned. To this end, the initial recommendation is to ensure that appropriate external support is gained to provide robust accountability for the full implementation of these recommendations.

Part 1: Opportunities for learning and improvement within ECW

Theme 1: Developing healthy culture

It is recognised that ECW have made significant steps to addressing issues related to safeguarding and HR since the disclosures occurred however concerns remain about some persistent aspects of unhealthy culture, described by some participants as a culture of fear. The recommendations below will only be effective if the unhealthy aspects of the culture noted in this Review are fully addressed and changed.

ECW need to continue to reflect on the cultural elements described in sections 1-4 that allowed behaviour to occur and not be disclosed. Changing culture is a lengthy process.

Recommendation 1

The Trustees and Leadership Team should develop an action plan to address aspects of unhealthy culture and develop healthy cultures. This would illustrate commitment and allow accountability for addressing cultural issues remaining within ECW. It is recognised that some of this work will take place in leadership groups, but it is also essential to include the whole congregation as cultural change occurs most when all members of the culture are involved in the process. The Trustees should monitor progress against this action plan and report progress to the Charity Commission as appropriate ensuring external accountability. A clear time scale for the completion of the plan should be drawn up and this should not extend beyond five years. This time frame allows acknowledgment of the number of recommendations but ensures a timely completion to underpin good safeguarding and ongoing development of culture.

Recommendation 2

The Leadership Team and the Safeguarding Officer should ensure there is teaching developing a healthy culture and the hallmarks of this and to include material on bullying, manipulation, coercive control and spiritual abuse as part of this to raise awareness of these behaviours and their impact and to explore best practice for response in order to create a healthy culture in which these behaviours are more likely to be recognised and responded to effectively in the future.

Theme 2: Healthy leadership, governance and accountability

There have been changes to leadership and governance and accountability structures within ECW since 2012 and many of these are positive. However, some concerns still remain.

It is the opinion of the Reviewers that the aspects of unhealthy culture at ECW and more broadly across the affected CE constituency might only be addressed fully by those having played a key role in the establishment and maintenance of that culture to no longer enjoy the influence they have had to date (i.e. considering their positions and stepping down). It is not for this review to determine the details of how this should take place, but it should

be recognised and considered as a necessary part of a demonstrable commitment towards a safer, healthier culture.

Recommendation 3

Trustees should undertake a review of those in leadership roles and structures at ECW. If any individuals within this are identified as an ongoing threat or obstacle to creating safer places within the church this should be discussed with the Diocese and/or the NST where appropriate in order for action to be taken. The Trustees of ECW should make further efforts to highlight and commit to further action where harm has been caused. This needs to be undertaken within an understanding that this may require some external support, accountability and scrutiny.

Recommendation 4

All in leadership and role holder positions (both currently and formerly) at ECW should continue to reflect upon their own behaviours and commit to further formal processes that can identify where there may be need for change and improvement and any further action or training that is appropriate.

Recommendation 5

All in leadership positions and role holders at ECW should engage with healthy leadership training delivered by organisations beyond the current constituency.

Recommendation 6

The Leadership Team and Trustees should review the process for the appointment of Elders. Appointment of Elders should be a transparent process and include engagement from the congregation. This creates accountability and encourages diversity.

Recommendation 7

The Church Wardens should meet regularly with the Vicar to provide support, wellbeing checks and to embed accountability.

Recommendation 8

The Leadership Team should review communication strategies to ensure the congregation have the opportunity to be fully informed of any ongoing work related to the Review and the implementation of recommendations, consideration should be given to different methods for sharing information to ensure information is accessible to all.

Recommendation 9

The Safeguarding Officer should create a structure for congregational members to be able to raise low level concerns that do not reach a safeguarding threshold. These should be held centrally in ECW in order to pick up any patterns of behaviour.

Recommendation 10

The Trustees and Leadership Team should continue to develop the relationship with the Diocese of Southwark, CofE structures and the House of Bishops. This development of relationships should ensure ECW is accountable and does not operate as independent from the Diocese or other CofE structures. This should also ensure the status of proprietary chapel is not seen as a license for independence.

Recommendation 11

The Trustees and the Leadership Team at ECW should ensure that all staff are fully committed to the appraisal process.

Recommendation 12

The Trustees and Leadership Team should explore whether there is an external body who could handle complaints if there is no resolution after the Trustees' stage.

Recommendation 13

The ECW committee for mission funding should reassure itself that its duty of care has been undertaken for any mission partners that are funded. This reassurance should ensure:

- That professional mission organisations that are used by mission partners have adequate safeguarding policies and practice.
- That this includes an awareness of different laws and cultures.
- That any risk associated with mission partners is assessed and revisited in response to any new information.
- That there is an assessment of support needed for any mission partners that have been affected by the behaviour of JF.

Theme 3: Effective safeguarding culture and practice

There have been significant improvements in safeguarding policy and practice in ECW since 2012. There are however some actions that have been highlighted by the safeguarding audit at Appendix One and these are highlighted in the following recommendations.

Recommendation 14

The Leadership team and Safeguarding Officer should continue to further develop the response and range of support for victims of abuse (not solely related to JF's activities). This should include a choice of internal support and external independent support. The role of Safeguarding Officer will be central to the delivery of this recommendation.

Recommendation 15

The Leadership Team and Safeguarding Officer should continue to develop a culture in which there is a clear distinction between disclosure and gossiping and where disclosure is viewed and responded to effectively.

Recommendation 16

Trustees, Leadership Team and the Safeguarding Officer should develop a mutual and effective working partnership with the Diocese to improve safeguarding practice and partnership working. There may need to be some mediation for this relationship to be fully restored.

Recommendation 17

The Leadership Team and Safeguarding Officer should ensure that all safeguarding matters are directed to the Diocesan Safeguarding Advisor in a timely manner and in adherence to House of Bishops guidance.

Recommendation 18

The Safeguarding Team should ensure that confidentiality boundaries are respected in any safeguarding concern and that information sharing agreements and other protocols are in place to support this (see also recommendation 22 below).

Recommendation 19

The Safeguarding Team should continue to develop a safeguarding culture by implicit and explicit positive messages about the importance of safeguarding and its place in the ministry of ECW.

Recommendation 20

Trustees and Leadership Team (including Parish Safeguarding Officer) should continue to monitor safeguarding practice and attitudes towards safeguarding within ECW.

Recommendation 21

Trustees and Leadership Team (including Parish Safeguarding Officer) should ensure there is a clear pathway for safeguarding concerns to be raised external to ECW. This should be effectively communicated regularly at all levels of ECW.

Recommendation 22

The Trustees and Leadership Team should develop a formal process of commissioning where external advice is sought. This should be the same process regardless of whether there is financial cost or no financial cost. This process should include a formal information sharing agreement (ISA). Where information is being shared, even on a non-identifying basis, the person whose information is being shared should be informed what information will be shared and with whom in line with the ISA, for the purpose of seeking advice.

Recommendation 23

In order to demonstrate adherence to best practice principles underpinning current data protection legislation, thirtyone:eight have requested that ECW make direct written contact with all individuals whose personal and sensitive information has been shared, albeit only in a pseudonymised form ahead of the Review publication. This recommendation was made out of concern that those whose information had been shared should not read this for the first time in a public Review.

ECW have informed the chair of the IAG that they have fulfilled this recommendation.

Recommendation 24

If there is a continuation of lodging arrangements, it is recommended that there is a formal process and support policy for those who lodge. This should include risk assessment where there is known risk.

Recommendation 25

It is important that clear safeguarding messages are given from the front and that all members of the congregation are clear who the Safeguarding Officer is, how to report a concern and that when a concern is raised it is taken seriously and treated with appropriate confidentiality.

- The Leadership Team and Safeguarding Officer should ensure that clear safeguarding messages as outlined above continue to be regularly communicated from the front.

Theme 4: Support for victims, survivors and others

ECW has made support available to victims of JF and this is now able to be accessed independent to ECW, through thirtyone:eight.

Recommendation 26

The Trustees and Leadership Team should ensure that finance for victims to access support is continued post the Review and accessible independently.

Recommendation 27

The Trustees, Leadership team and PSO should develop pastoral support for the whole congregation in moving forward as the Review has identified the impact of the disclosures on a wide spectrum of individuals.

Consideration should be given that some may wish to access support confidentially and independently of ECW. The process on how to access this should be well communicated (see recommendation 14).

Recommendation 28

The Leadership Team and Safeguarding Officer should ensure pastoral support is available to those in safeguarding positions in ECW.

Part 2: Opportunities for learning and improvement in organisations beyond ECW

Whilst recommendations 1–28 are directed specifically towards ECW, it is the opinion of the Reviewers that in order for wider accountability and responsibility to be demonstrated, the following recommendations (29-66) should be considered more widely in the CE constituency churches and networks as well as by ECW where relevant.

This Review has illustrated that ECW did not operate in isolation but was connected to a wider community. There are lessons and recommendations for the constituency in which ECW is positioned, for the CofE and for all churches and indeed some are relevant for other faith and non-faith-based organisations to consider. Concern has been raised about issues in the broader CE constituency of which ECW is part remaining unaddressed, and how the findings of this Review need to be reflected upon and actioned.

Wider responsibility should be felt and demonstrably shape future actions of individuals, organisations and networks. Whilst the focus of this report is upon ECW and its past Vicar JF, it is a matter of grave concern that any lack of wider responsibility and accountability being taken should hinder necessary change more widely.

In light of the inter-connectedness of the churches and networks in the CE Constituency this will ensure any learning and improvement is implemented to the maximum potential both within ECW and within the wider network.

There is an urgent need for individual and collective repentance demonstrated by a clear pursuit of learning and change. Repentance would include all those who have been responsible for harm, or complicit in it (either through acts of commission or omission) being able to clearly articulate where they have wronged others and what they intend to do in order to begin reparations.

It is also worth noting that other Reviews, for example The Crowded House Review¹⁹ have made comment on culture and learning which could add to the understanding and learning within this Review. Other Reviews are ongoing (e.g. the Makin Review into the activities of John Smyth) and learning from all of these may helpfully be collated following publication of all, to demonstrate shared areas of concern, failings and good practice in addition to recommendations.

¹⁹ <https://thirtyoneeight.org/get-help/independent-reviews/crowded-house-review/>

Theme 5: Developing safer cultures

There are many issues related to safer cultures throughout the Review. Christian organisations are especially encouraged to reflect on the importance of safer cultures and consider the implications for their own settings.

Recommendation 29

Constituencies and organisations must ensure that victims and survivors are always prioritised above protecting alleged perpetrators or the reputation or influence of the Church, organisation or constituency.

Theme 6: Leadership

Placing leaders on pedestals and enabling them to develop 'celebrity status' is unhealthy and can lead to unsafe practice. The status of leaders can be enhanced when they lead across a constituency.

Recommendation 30

Those organisations that provide ministry training should consider developing reflective practice in ministry around power, positioning and influence in their local context and across contexts in which they minister and allow external scrutiny of leadership.

Recommendation 31

The CE Constituency must reflect on their positioning of leaders including the power and influence associated with this; how diverse and inclusive their leadership teams and platform speakers are and any ways in which they may be perpetuating privilege and status. Inviting external scrutiny should be part of this process.

Recommendation 32

Leaders should be reflective of their use of power and the inherent power their leadership role provides.

- Those organisations who provide ministry training should ensure that reflective practice around use of power and the inherent power that the role of leadership provides is included in all ministry training programmes.
- Faith organisations should consider how they promote reflective practice around use of power within their leaders and consider introducing this to job descriptions and training needs assessment.

Recommendation 33

All faith-based organisations should review their accountability structures to ensure that there is a clear line of accountability for all who hold leadership positions including external accountability. External accountability can take the form of diocesan arrangements, denominational arrangements or where organisations are independent through local networks or with other faith-based organisations.

Recommendation 34

All faith-based organisations should review the support and supervision mechanisms available for leaders at all levels including during ministry training.

Recommendation 35

Organisations should ensure they have accountability, governance and support mechanisms in place for their leaders.

Recommendation 36

Faith-based organisations should encourage all leaders to engage in continual professional development and leadership training, especially from outside of their local constituency or context and record engagement.

Recommendation 37

Leadership teams should ensure that their organisation promotes inclusion and diversity at every level of their organisation. Thought should be given to how all groups (gender, ethnicity, social status as examples) within their organisation are represented, how their voice is heard and how this is responded to.

Theme 7: Safeguarding and safer cultures

There is some evidence in the Review of negative discourses and messages around safeguarding which act against effective practice.

Recommendation 38

All faith-based organisations should ensure safeguarding is promoted as an integral part of mission and ministry and that positive discourses around safeguarding are shared explicitly and implicitly - this is essential as policies and procedures without a shared understanding and commitment to safeguarding will not work effectively.

Recommendation 39

Constituencies and organisations must reflect on their own commitment to safeguarding, ensuring there is a clear commitment at all levels of leadership and invite external scrutiny and accountability as a model of good practice. Action should be taken to improve commitment to safeguarding where necessary.

Recommendation 40

All faith-based organisations should ensure there is regular teaching on healthy cultures and bullying, manipulation, coercive control and spiritual abuse as part of developing safer cultures. This is to raise awareness of harmful behaviours and their impact and to explore best practice for response in order to create a culture in which these behaviours are more likely to be recognised and responded to effectively in the future.

Recommendation 41

All faith-based organisations should develop an understanding of the characteristics of safer/healthier cultures. This will enable organisations to build these more effectively for the future. Safer cultures are important in addressing areas which may fall outside of statutory categories but can cause harm.

Recommendation 42

All churches and faith-based organisations should ensure there are clearly signposted safe pathways for individuals to raise concerns both internally and externally.

Recommendation 43

Faith-based organisations must ensure all positions appointed to, follow safer recruitment practices.

Recommendation 44

Faith-based organisations need to ensure that safeguarding is prioritised and that theological positioning cannot hamper or minimise safeguarding. This will require an intentionality to regularly monitor and ensure regular messages are given throughout the organisation.

Recommendation 45

Leadership teams and their governance structures should ensure there is awareness at all levels of their organisation that separation can be created through disagreement over theological positioning. Where this occurs communities and constituencies can feel marginalised and attacked. This can work against partnerships and process that are essential for good response to disclosures of abuse. It is essential that thought is given as to how communities holding different theological positions can work more effectively together to ensure that safeguarding concerns are not minimised or ignored and are responded to effectively.

Theme 8: Churches operating independently

Some churches operating under denominational banners are effectively operating independently and in effect being allowed to do so. This can impact on scrutiny, governance, accountability and safeguarding.

Recommendation 46

All dioceses, denominations and organisations responsible for oversight and scrutiny, should highlight where churches and organisations within their oversight, are attempting to operate independently (i.e. without appropriate accountability). A clear plan should be developed with each organisation to ensure accountability and oversight is effective. The use of mediation should be considered where there is relationship breakdown.

Recommendation 47

Churches operating with a degree of independence from recognised structures must maintain effective relationships with their denomination or diocese and ensure adherence to governance, accountability and safeguarding structures and protocols. We consider that the denomination has both an element of vicarious responsibility and a duty of care towards those operating under its banner and should act if churches continue to attempt to operate independently or do not comply to governance, accountability and safeguarding policy and practice.

Theme 9: Protocols to help churches and organisations manage such cases

Safeguarding policies and practice guidance provide information for reporting and referral. However, cases involving people with significant public profiles or who have been involved in multiple incidences of abuse are likely to obtain national coverage.

Recommendation 48

All faith-based organisations should review guidance around the management of serious, complex and high-profile cases. This guidance should enable churches and other organisations to be aware of and action all the aspects of high-profile cases that they need to consider. It should include when and how to seek specialised external support.

Theme 10: Accountability in personal work

In many ways relational work is the foundation of Christian discipleship but this case illustrates the necessity for robust oversight and accountability in such work, so that it cannot be misused to recruit, 'groom' or harm individuals.

Recommendation 49

Any organisation in which personal work occurs must have clear policies, procedures and guidance to ensure that this is conducted safely and to avoid dependent and unhealthy relationships being able to be established.

Theme 11: Understanding vulnerability

This Review demonstrates that current understandings of safeguarding primarily are seen to relate to children, young people and adults 'at risk of harm' (often still referred to in faith contexts as vulnerable). Where adults do not meet the criteria for being at risk of harm, they can experience damaging behaviours that do not cross into a statutory category of harm and in this context can render them vulnerable. There is a need for this current void to be addressed. There has rightly been recognition that in cases of domestic violence, experiences of coercive control are categorised as abusive and constitute a legal offence. However, this does not currently apply outside of the intimate partner or family context.

We also consider that the issue of consent requires further legislative scrutiny in contexts where there is a significant imbalance of power and/or status and/or age including in a religious context.

Recommendation 50

All those involved in developing safeguarding policy and practice should reflect upon understandings of vulnerability to consider relationships and contexts in which coercive behaviour may render someone vulnerable and at risk of harm or abuse.

Recommendation 51

The issue of consent should be subject to further legislative scrutiny in contexts where there is a large imbalance of power and/or status and/or age including in a religious context.

Theme 12: Iwerne camps

The role of Iwerne camps and the interconnection with ECW has been made by many throughout the interviews. There are two current Reviews taking place that will examine the culture of Iwerne further.

Recommendation 52

It is a recommendation of the Reviewers that all involved and previously involved in Iwerne consider the abuse and harm that has occurred to former members of Iwerne. This consideration should include any masking or deliberate cover up of harm and the impact and further harm caused by this. This should include a review of those in senior leadership positions.

Theme 13: Relationship between diocese and parish churches

The vital role of the relationship between parish church and diocese in providing external accountability and a source of external safeguarding advice has been highlighted throughout this Review. Where this relationship breaks down this leads to a significant weakening of the safeguarding structure within the CofE.

Recommendation 53

The CofE needs to consider the process for highlighting where these relationships have broken down and in response, a system for provision of mediation to restore good working relationships.

Recommendation 54

Denominations where such partnership and relationships are similarly integral to effective safeguarding need to undertake similar consideration within their organisation's context.

Recommendation 55

Wherever there are Provincial Episcopal Visitors (PEV) arrangements in place the Diocesan Bishop should review arrangements and ensure that there is clarity in writing as to the roles and responsibilities of the PEV and the roles and responsibilities of the Diocesan Bishop.

Theme 14: The National Safeguarding Team

Throughout the review it has been clear that some working relationships have not always been as effective as they could have been, and systems and structures have not always helped to reach clear and consistent conclusions. In the case of the NST, it has been particularly challenging to understand the rationale upon which some key decisions have been made. A lack of effective and accessible record keeping has hindered reaching clarity in this regard.

Recommendation 56

There is urgent need for a formal case management system in the NST and to ensure that the criteria for what constitutes an NST case is clearly understood by all involved in decision making and consistently implemented. All decisions should be recorded, and records kept.

Recommendation 57

Victims need a streamlined, responsive, victim-focused system within the CofE. The current layers of parish, diocesan and NST create a complexity which is extremely difficult to navigate and works against effective response. There needs to be a clearer delineation of responsibility for the management of cases.

Wherever responsibility lies for case management there should be a single point of contact for this and liaison with those involved in the case and the victim. Every effort should be made to ensure consistency in the single point of contact. Consideration should be given to an offer of external independent advocacy for victims. This must be addressed urgently.

The CofE should review the current safeguarding structures to ensure there is a streamlined, responsive, victim-focused system within this structure in line with the above paragraph which includes minutes records of how and why decisions were made. These records should be stored securely so they can be provided for victims and review processes.

Theme 15: Independent, external oversight

The Review illustrated the complexity of addressing safeguarding concerns from within and how this could act against disclosure, especially in a situation where the individual is highly influential and the level of interconnectedness results in a feeling of a lack of safety in disclosing within the church, denomination or constituency. It also illustrated the call for independent investigation of disclosures.

Recommendation 58

Given the difficulties this Review has identified, strong consideration should be given to the establishment of an external, independent body where individuals could disclose confidentially. This could provide victims with a safe space and enhance the likelihood of early disclosure, effective response and therefore facilitate early intervention. This could support recovery but also prevent further harm to others.

Recommendation 59

Ministerial training organisations should ensure that those in ministerial training have a clear referral pathway to raise concerns external to their training institution.

Theme 16: PTO removal

This is a complex area, but this Review illustrates that the removal of Permission to Officiate (PTO) presents complexities. This can result in a situation where people may be uninformed, potentially placed at risk and vicars and PSOs being unable to manage that risk.

Permission to Officiate means an ordained minister may officiate at CofE services. In order to officiate the Diocesan Bishop must give Permission to Officiate within their Diocese. The permission can be removed which makes it unlawful for the ordained minister to officiate at any CofE service.

As a related, but distinctly different process, deposition means removal of the right to the exercise of ministry in all of the Holy Orders to which a person is ordained, and “depose” has a similar meaning. This represents a wider definition of ministry.

Recommendation 60

The CofE to consider what information is shared following the removal of PTO, who this information is shared with, how to respond to non-compliance to restrictions, and the fact that responsibility is currently placed on a vicar to refuse permission to minister. The Independent Inquiry into Child Sexual Abuse (Anglican Investigation) recommended that in addition to removal of PTO, the CofE should reintroduce the power to depose from Holy Orders where a member of the clergy is found guilty of child sexual abuse offences. The Reviewers recommend that this is extended further to include any found guilty of abuse and harm of adults or children and young people.

- c) The CofE should review processes for removal of PTO and the information sharing processes associated with the removal of PTO. Where PTO has been removed on safeguarding grounds, the bishop should inform all their parish safeguarding officers and vicars of the removal of PTO and the reasons for this. Where this affects a wider constituency the wider communication of this needs to be planned carefully and should be proportionate.
- d) Further reflection should be given, as PTO only applies to licenced ministry, to safeguards against individuals continuing to minister in external settings without

restriction and therefore having influence and access to people, which could pose a risk.

Recommendation 61

There are significant and ongoing safeguarding concerns around JF's relationships and any mentoring or ministerial activities. The Reviewers recognise that PTO has been removed but there is a need for clarity that the significant and ongoing safeguarding concerns relate to all aspects of Christian influence and ministry, including (but not limited to) personal work, pastoral care and mentoring.

The Diocese of Southwark and the CE constituency should ensure that there is this clarity in all churches where these relationships exist. In adherence to current House of Bishops' guidance, arrangements should continue for there to be a safeguarding agreement at any church where JF attends in line with risk assessments undertaken. We would strongly recommend that any ministry, such as personal work, pastoral care and mentoring that JF may wish to participate in should be fully risk assessed to determine suitability and risk and be included within any safeguarding agreement.

Theme 17: Homogeneity

The Review illustrated that one of the biggest difficulties in identifying and disclosing the behaviours was the myth of homogeneity. The Review evidenced that a person who possesses positive characteristics and is widely highly-regarded could nonetheless display entirely inappropriate, abusive and harmful behaviours which render them 'unfit for their office'.

Furthermore, those who wish to disclose abuse or harmful behaviours can be caused to question their experience and reality where the predominant narrative outlines the positive traits of an individual. When this is combined with a narrative of protecting the gospel above all else then this becomes a powerful barrier to disclosing abuse or harmful behaviour.

Recommendation 62

All faith-based organisations to ensure safeguarding training includes a discussion of our views of homogeneity, debunking this myth and how these can act against identification and response to abuse.

Theme 18: Role of media and social media

The role of the media and social media in the coverage of the JF case has been seen positively by some as a means of breaking the story but also has had clearly damaging impacts on many. The Reviewers recognise that there has been a discourse around social media being an ungodly means of communication.

Recommendation 63

All media organisations need to consider how and when they break stories of abuse, harm or trauma and the support identified within these for those who have been impacted.

Recommendation 64

Social media providers should review arrangements for support of users where there is disclosure of abuse on their platforms. This should include how disclosures are shared and the impact of this, especially the unexpected nature of finding stories on social media

and those affected feeling unprepared and therefore unable to manage the impact. Social media providers should consider arrangements for ensuring users are aware of support organisations within their country.

Recommendation 65

Where individuals are using social media to talk about their experiences, care and consideration should be given in expressing perspectives as being shared by all victims, members etc.

Recommendation 66

All faith-based organisations need to consider the messages that they give around the use of social media in a similar way that we would around the difference between disclosure and gossip.

Section F: Appendices

Appendix One:

The review of the effectiveness of current safeguarding arrangements

This safeguarding aspect of the report has been compiled from many sources of information. These include:

- Meeting with the safeguarding lead to ascertain the understanding and interpretation of safeguarding and the particular challenges this presents for ECW.
- An overview gained from reading relevant policies currently in place and from information on the website.
- Meeting with a variety of leadership, employees and volunteers ascertaining their understanding and interpretation of safeguarding in the varied and complex context of the work of ECW.
- Meeting with those who have experienced the behaviour of JF.
- Evidence of compliance with various aspects of the audit provided through a shared google drive.

The following interviews with staff, volunteers and participants of the Lessons Learned Review have informed the safeguarding audit section of this review:

Video Call with:

- PSO for JF case management/Women’s Worker
- Lead Safeguarding Officer
- Church Admin, Church Manager
- DBS Manager
- Chair of Trustees (Trustee with oversight of safeguarding and HR)

This information has then been reviewed against thirtyone:eight’s 10 safeguarding standards. The findings are outlined in the following sections.

Standard 1 SAFEGUARDING POLICY		Fully met	Part met	Not met	N/A	Comments/Evidence
Every organisation open to, or likely to have contact with, children, young people and adults at risk should adopt a formal, working safeguarding policy						
1.1	The Safeguarding Policy complies with and endorses the law, government regulation and best practice and is endorsed by the Leadership.	x				Safe Church 2020 is a comprehensive and in-depth safeguarding manual for the Diocese of Southwark. It includes a wide range of templates and forms for churches to adapt and use. This manual has been revised and updated this year.

					<p>ECW have revised their policies, staff handbook and processes in relation to these changes and these have been communicated effectively to staff and the congregation as appropriate. Evidence has been seen of this.</p> <p>Safe Church 2020 fully complies with and endorses the law, government regulations and best practice and is endorsed by the leadership at ECW.</p>
1.2	The Policy Statement includes the organisation's commitment to safeguarding, including contact information, and is displayed prominently.	x			The Policy Statement for the church includes the organisation's commitment to safeguarding, includes contact details for the PSO and is displayed on the website of the church as well as the pinboard in the church. This pin board also includes contact details for relevant helplines such as Childline and the Domestic Abuse helpline. The Domestic Abuse helpline is also displayed on the inside of female toilets in the church building.
1.3	There is a Safeguarding Co-ordinator who has implemented the safeguarding policy and is promoting the safeguarding agenda within the organisation.	x			<p>There is a Parish Safeguarding Officer who is responsible for the day to day running of safeguarding. There is a further member of staff who is responsible for the JF safeguarding issue and the response to this.</p> <p>Safeguarding is a regular agenda item at trustees' meetings and at church council meetings.</p> <p>There is evidence that the safeguarding policy has been implemented and that the safeguarding agenda is promoted in the organisation.</p>
1.4	The Leadership is familiar with the safeguarding policy and actively supporting the Safeguarding Co-ordinator.	x			The PSO and the staff member with responsibility for the JF safeguarding Issue both felt actively supported by the leadership, the staff team and the trustee for safeguarding. There

					was a recognition of the impact of dealing with the non-recent safeguarding issues. There were some queries about how supported the safeguarding officer for JF felt regarding the diocese.
1.5	The organisation has incorporated the relevant laws and government expectations into all the safeguarding standards in this manual.	x			
1.6	The organisation has appropriate insurance including legal protection and public liability cover.	x			

Overall Comments on Standard (including actions where appropriate)

There is a clear line of accountability from trustee level to leadership and PSO around safeguarding. There are some further improvements that could be made regarding the openness and transparency of appointment of elders. Safeguarding is clearly on the agenda at a number of levels. All levels of the leadership demonstrated familiarity with the safeguarding policy and who to seek advice from if necessary. There is an intentionality around ensuring safeguarding is on the agenda, albeit with a recognition that there is more work to do and lessons to be learned from this review.

Standard 2 AWARENESS & TRAINING		Fully met	Part met	Not met	N/A	Comments/Evidence
Every organisation open to, or likely to have contact with, children, young people and adults at risk should adopt a formal, working safeguarding policy						
2.1	The Leadership has undertaken safeguarding training		x			All the leadership have attended C1 or C2 training and evidence has been provided of attendance. There are some newly appointed staff who are waiting for diocesan training to be available. This should be seen in the context of training availability and current Covid-19 situation
2.2	The Safeguarding Co-ordinator role has been explained to everyone especially children and adults at risk		x			The PSO details are displayed prominently on the website and the safeguarding display board. It is vital that there is clear communication from the front to

					the whole congregation both regarding the safeguarding co-ordinator but also clear messages that the safeguarding co-ordinator will take all concerns seriously. This message needs to be repeated regularly to ensure people are fully aware of and feel safe in how they can report concerns.
2.3	Workers have received safeguarding training; this has been included in the new workers' induction programme and further relevant training opportunities are available to update skills and knowledge.	x			All workers and volunteers have received safeguarding training. Training is recorded on Klemi, the church database and a system is in place to flag up when refresher training is needed. ECW have a proactive system of parents of children who turn 3 being offered safeguarding training C1 so they are able to volunteer safely with relevant DBS checks. This a proactive and sensible way of preparing volunteers to be available and flexible to volunteer. This is excellent practice. It does however, need to be made clear that this is an individual choice and not an expectation, especially with the historic context.
2.4	Those using the services provided by the organisation have been given advice and support on keeping themselves safe	x			<p>Helplines, PSO details and the safeguarding policy are displayed prominently on the safeguarding display board at the church.</p> <p>The staff team have a list of those who may be more vulnerable with a recognition this may be permanent or temporary.</p> <p>See 2.2 in relation to clear communication of safeguarding messages from the front.</p>
2.5	Safeguarding awareness training has been delivered within a framework of equality and inclusion, recognising that certain groups are particularly vulnerable to abuse because	x			The diocesan training is delivered within a framework of equality and inclusion. It recognises that certain groups are particularly vulnerable to abuse because of their disability or circumstances.

of their disability or circumstances					
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Overall Comments on Standard (including actions where appropriate)

ECW is proactive in ensuring all leaders, workers and volunteers are trained to the appropriate levels through the Diocese of Southwark safeguarding training. This is delivered through a framework of equality and inclusion, and recognises the vulnerability of certain groups.

Training attendance is monitored through the Klemi database and there is a system for flagging up when refresher training is due.

PSO details are clearly displayed on the Safeguarding noticeboard and on the website. It is important that, in addition, clear safeguarding messages are given from the front and that all members of the congregation are clear who the safeguarding co-ordinator is, how to report a concern and that when a concern is raised it is taken seriously and treated with appropriate confidentiality. This gives a confidence to those in the congregation and ensures that they feel safe in passing on a concern.

Standard 3 SAFER RECRUITMENT		Fully met	Part met	Not met	N/A	Comments/Evidence
Every organisation open to children, young people and adults at risk should adopt a formal recruitment policy for all workers, both paid and voluntary						
3.1	Job/role descriptions and person specifications have been prepared for all posts and formal advertisements are posted at least internally (paid and volunteers).		x			Job descriptions have been prepared for all employed staff. Volunteer role profiles are currently being developed and a process for the safer recruitment of volunteers is being refined. Formal adverts are posted for all posts. Evidence has been given to support this in the form of adverts, job descriptions etc.
3.2	A standard job application is completed by all applicants giving details of previous experience, qualifications, referees and any other supporting information		x			A standard application is completed by all applicants. Evidence provided of details of previous experience, qualifications, referees and supporting information in relation to the person specification.

						There was a recognition that the volunteer recruitment process was being further developed. It is good practice to have a standard application for volunteers. This may be shorter than a paid position but should include previous experience, qualifications referees and some supporting information as a minimum.
3.3	A self-declaration form is completed by all those applying to work with children or adults at risk, and those who are in positions of trust (including trustees) detailing any cautions, convictions and any other criminal history.	x				A self-declaration form is completed by all those applying to work with children or adults with care and support needs. This is also the case for those who work in positions of trust. This is repeated on an annual basis.
3.4	At least two references are obtained for all applicants; one of these being current or former employer.		x			Two references are obtained for all applicants one professional and 1 minister. ECW should ensure that this is also the case for volunteers.
3.5	All applicants being considered for a post have been interviewed (face-to-face).		x			All applicants being considered for a post have been interviewed (face-to-face). Consideration to some form of interview for volunteers would be useful, even if this is an informal chat to check motives for working with children, young people or adults with care and support needs.
3.6 - 3.1 4	All applicants being considered for a post have undergone a criminal records check / disclosure following Criminal Records Bureau standards and procedures.	x				All workers and volunteers undergo a DBS Check. All DBS checks are recorded on Klemi and a system is in place to flag up when a renewal is due.

3.1 5 - 3.1 6	All those involved in recruitment are familiar with the role and purpose of the Disclosure & Barring Service (formerly the Independent Safeguarding Authority and Criminal Records Bureau).	x				There is a clear knowledge of the DBS process, the role and purpose of the DBS.
3.1 7	All appointments are made on the basis of a person's experience, ability and suitability to perform the tasks and roles in the post for which they have applied (based upon the job description and person specification for the role).	x				An interview grid is used for all interviews that focusses on a person's experience, ability and suitability. It is important that some thought is given to how this can be evidenced and communicated to potential applicants to ensure that not only is this the case but that there is no perception of favouritism, selectivity etc. as there has been in the past.
3.1 8	All unsuccessful applicants are notified in writing of the decision not to appoint.	x				
3.1 9	Successful candidates are provided with a written contract.	x				All successful candidates now have a written contract.
3.2 0	A probationary period is agreed which includes induction and supervision.		x			There is a 6-month probation period with a 3-month review The volunteer safer recruitment process should allow for some probationary time. It is not necessary for this to be as long as paid employment, but it is good practice to check suitability of volunteers in role.
3.2 1	Following any unsatisfactory probationary period every attempt is made to address concerns before terminating the employment contract.	x				
3.2 2 - 3.2 3	Safeguarding procedures are in place for helpers and occasional workers and workers from abroad.	x				ECW runs holiday clubs and volunteers cover youth work over August to ensure youth workers have a break. Recruitment for these

						volunteers begins in May to ensure all volunteers are trained and DBS checked.
3.2 4	All adults in host families have undergone criminal records checks.				x	Host families are not used.

Overall Comments on Standard (including actions where appropriate)

There is a clear safer recruitment process for employed staff and evidence has been seen of this. The volunteer safer recruitment is being further developed. It may be useful to consider a monitoring and recording process for both paid and voluntary roles to ensure that each stage of the safer recruitment process is undertaken and can be evidenced. Continued further development of the safer recruitment process would be useful in relation to volunteers. ECW should ensure this includes volunteer role profiles, some form of informal interview before beginning role, DBS where appropriate and in line with DBS guidance, probationary periods for those volunteering to ensure role is a best fit for everyone and volunteers are suitable for their role.

All staff who leave are given an exit interview. This is excellent practice. I would suggest this is an offer that could be extended to those that leave a volunteer role or leave the congregation. At least a less formal system for providing feedback prior to leaving would be useful.

Standard 4 MANAGEMENT OF WORKERS		Fully met	Part met	Not met	N/A	Comments/Evidence
In every organisation that is open to, or where services are provided for, children, young people and adults at risk of harm, all workers, paid and voluntary, should be appropriately managed, supervised and supported.						
4.1	Written guidelines for standards of behaviour have been given to all workers.		x			All employed staff expected to sign code of conduct. Currently volunteers are given the guidance in A Safe Church. Currently developing role specific code of conducts for volunteers.
4.2	All workers are being adequately supervised.		x			There are regular staff meetings. These are much safer places than they have been in the past. There is also an annual appraisal system in place with a 6-month review (3 months for new starters). ECW should

					ensure that all members of staff have an appraisal and are fully compliant with this process. This should be mandatory for all employees.
4.3	Team meetings are being convened regularly.	x			There are regular staff meetings. These are much safer places than they have been in the past. There is opportunity for everyone to speak and raise issues at these meetings. The beginning of the meeting is set aside for people to raise any concerns and issues they may have. This is in relation to any general concern as well as safeguarding concerns. There is always an opportunity for questions to be asked about decisions or issues. There is also an annual appraisal system in place with a 6-month review (3 months for new starters). This is designed to give support to employees as well. The benefits of this support should be communicated to all employees.
4.4 - 4.7	Where there is an allegation of abuse against a worker: <ul style="list-style-type: none"> • Children, young people and adults at risk of harm are being safeguarded • the worker is being supported • appropriate action is being taken 	x			There are clear procedures in Safe Church 2020 and when discussed with PSO there was a clear knowledge of the necessary action to take to safeguard children, young people and adults at risk, to support the worker and to take appropriate actions such as reporting to diocese, a diocesan risk assessment, suspension, speaking to the LADO etc.

4.8	A mechanism is in place for workers to raise legitimate concerns about other workers without impunity, and disciplinary and grievance procedures are in line with the ACAS code of conduct	x				There are clear whistleblowing policies and grievance policies within the Safe Church 2020 manual. Every member of staff is given an exit interview. This is excellent practice. This could also be extended to volunteers and members of the congregation and would provide an excellent opportunity for feedback.
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Overall Comments on Standard (including actions where appropriate)

Overall, there was evidence that there was clear policy and practice around working safely. There is a need for the development of a volunteer code of conduct.

The appraisal system is a really positive step forward, but ECW should ensure that all staff are fully committed to this process. ECW should consider whether they wish to make this mandatory for all employees. At the very least the benefits of the support given in the appraisal process should be communicated to all employees.

There are clear procedures for dealing with allegations against a worker and these ensure that children young people and adults with care and support needs are safeguarded, that the worker is supported, and that appropriate action is taken.

There are clear whistleblowing policies and grievance policies within the staff handbook. This has been recently revised and has been circulated to all employees. Evidence has been seen of this process.

Every member of staff is given an exit interview. This is excellent practice. This could also be extended to volunteers and members of the congregation and would provide an excellent opportunity for feedback.

Standard 5 WORKING SAFELY		Fully met	Part met	Not met	N/A	Comments/Evidence
All organisations involved with children, young people or adults at risk must ensure they adopt safe working practice in every area.						
5.1	The organisation is working to the current legislation and government guidelines in their duty to care and working in positions of trust.	x				There is clear guidance in Safe Church 2020 and evidence has been seen from discussions that this guidance is being undertaken.

5.2	The organisation is working to the agreed policy in respect of gifts, rewards and zero tolerance of favouritism.		x			There is a clear policy of any gift over £50 needing to be declared. The question of how this is recorded and monitored has prompted this to be actioned by ECW. ECW should ensure that a process for recording, gifts rewards etc. is put in place. In relation to favouritism and especially due to issues discussed in this report, efforts need to be made to ensure that not only is there no favouritism but that there is a transparency around this.
5.3	The organisation is operating procedures to carry our risk assessments on the activities and services it provides.	x				Evidence has been seen of risk assessments for internal and external activities. These were seen to be comprehensive and of a high quality.
5.4 - 5.7	The organisation has ensured that buildings used for any activities or services are properly maintained and meet safety standards.	x				This is included within risk assessments of activities.
	The organisation has ensured that the consumption of food and drink meets safety and hygiene regulations.	x				Guidance is given in Section 4 of Safe Church 2020. There is a training log and food preparation form.
	The organisation has ensured that a qualified first aider and adequate first aid kit is available at all activities run by the organisation.	x				A qualified first aider is on site and a first aid kit is in the building. This is in line with guidance in Safe Church 2020.
	The organisation is working to safeguarding principles when running any club, activity or service.	x				In discussions it has been seen that safeguarding principles when running clubs, activities or services are effective.
5.8	The organisation is working to acceptable adult to child ratios for any activity or service it is running.	x				Adult to child ratios are used from Safe Church 2020 guidance.

5.9	The organisation is complying with General Data Protection Regulations 2016/679 (the GDPR) and Human Rights Acts 1998 in relation to all activities and services.		x			There is good guidance within Safe Church 2020. ECW has its own privacy statement. As a potential GDPR issue has been raised around the sharing of highly sensitive information I would recommend that this situation is reviewed against current policy, and changes made to policy if necessary.
5.10	The organisation has a formal registration procedure for those wanting to participate in an activity or service run by the organisation.	x				This is in line with guidance within Safe Church 2020.
5.11	The organisation has ensured that a logbook is maintained for all services and activities and records are stored appropriately.	x				This is in line with guidance within Safe Church 2020.
5.12	The organisation has ensured that all accidents are recorded in a logbook and incidents reported to parents/carers.	x				This is in line with guidance within Safe Church 2020.
5.13	The organisation has ensured any peer-led activities are being run according to acceptable safeguarding standards.				x	No peer led activities or services take place.
5.14	The organisation is operating a formal policy for home visits.	x				This is in line with guidance within Safe Church 2020.
5.15	The organisation is operating a policy for unexpected attendees at any activity or service it is running.	x				This is in line with guidance within Safe Church 2020.
5.16	The organisation is working to formal procedures for allowing parents/carers to attend activities or services it is running.	x				This is in line with guidance within Safe Church 2020.
5.17	The organisation has a formal procedure for receiving and dealing with suggestions and	x				ECW has a formal process for complaints. Evidence has been seen of this. The complaints process stops

	complaints about any activity or service it runs.					with the trustees. It would be worth exploring whether there is an external body who could handle complaints if there is no resolution after the trustees' stage. Ministry trainees have an opportunity to feedback once a week in staff meetings. There is an online portal for members to feedback and there is an opportunity for feedback on decisions and issues throughout the year by allowing questions to be asked.
5.18	The organisation is working to a formal procedure for dealing with disruptive children and young people.	x				This is in line with guidance within Safe Church 2020.
5.19	The organisation is operating an anti-bullying policy.	x				This is in line with guidance within Safe Church 2020. This is also within the HR Handbook.
5.20	The organisation is operating a no-smoking policy and policy on the consumption of alcohol.	x				This is in line with guidance within Safe Church 2020 This is also within the HR Handbook.
5.21	The organisation is operating a policy of zero tolerance on illegal substances, guns, knives and gangs.	x				This is in line with guidance within Safe Church 2020.
5.22	The organisation is working to best practice in communicating and supporting those with special needs and disabilities.	x				This is in line with guidance within Safe Church 2020. There is a special needs group of adults and this run-in line with guidance in Safe Church 2020.
5.23	The organisation is working to best practice in delivering intimate care to those attending activities and services.	x				This is in line with guidance within Safe Church 2020.

5.2 4	The organisation is ensuring that drop-in centres are run to best working practice.				x	No drop-in centres are run.
5.2 5	The organisation is ensuring any outings are run to best practice and health and safety guidelines, including a risk assessment.	x				Evidence has been seen of comprehensive high-quality risk assessments being undertaken.
5.2 6	The organisation is working to best practice guidelines when transporting children, young people and adults at risk of harm and complying with government regulations.	x				There is clear guidance around this in section 4 of Safe Church 2020 guidance.
5.2 7	The organisation is working to best practice and complying with government regulations when running swimming trips.				x	No swimming trips are undertaken.
5.2 8	The organisation is working to best practice when organising sleepovers.				x	No sleep overs are organised.
5.2 9	The organisation has carried out a through risk assessment for residential holidays including ensuring a safeguarding policy is in place and criminal records checks have been carried out.	x				Evidence has been seen of comprehensive high-quality risk assessments.
5.3 0	The organisation is complying with a safeguarding policy and good practice for formal babysitting services.				x	No formal babysitting activities are undertaken.
5.3 1	The organisation is complying with the GDPR in respect of filming and taking photographs of people and the activities it provided.	x				There are clear processes for consent for filming and taking pictures and for the use of these online.
5.3 2	The organisation is operating safeguarding procedures and good practice for the use of Information Communication Technologies (ICT).	x				This is in line with guidance within Safe Church 2020.
5.3 3	The organisation is operating safe practice protocols in relation to designing and displaying information on the organisation's website.	x				See 5.31

5.3 4	The organisation is working to a clear, unambiguous policy in relation to abusive images of children.	x			<p>There is a clear statement in the Safe Church 2020 guidance in section 4 – 31</p> <p>ECW should consider whether the policy in relation to abusive images of children could be strengthened further by listing this as gross misconduct in the HR handbook.</p>
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Overall Comments on Standard (including actions where appropriate)

Safe Church 2020 provides detailed guidance on working safely. Through interviews held with role holders it has been demonstrated that there is a wide knowledge of this guidance and that this has been applied to the ECW context. In addition, the HR handbook provides further guidance for employees. Evidence has been seen of a wide range of comprehensive and high-quality risk assessments for a variety of internal and external activities.

There are a number of areas where improvements would add to the already effective working safely practice.

The complaints process ends with the trustees. It would be worth exploring whether there is an external body who could handle complaints if there is no resolution after the trustees' stage.

There is a clear policy of any gift over £50 needing to be declared. The question of how this is recorded and monitored has prompted this to be actioned by ECW. ECW should ensure that a process for recording, gifts rewards etc., is put in place. In relation to favouritism, and especially due to issues discussed in this report, efforts need to be made to ensure that not only is there no favouritism but that there is a transparency around this.

Action: If there is a continuation of lodging arrangements it would be prudent to ensure there is a formal process and support policy for those who lodge. This should include risk assessment where there is known risk.

The policy in relation to abusive images of children could be strengthened further by listing this as gross misconduct in the HR handbook.

Standard 6 COMMUNICATING EFFECTIVELY		Fully met	Part met	Not met	N/A	Comments/Evidence
The organisation should ensure that all those involved with children, young people and adults at risk of harm know how to communicate effectively and relate to those with whom they come in contact						
6.1	The safeguarding message is being communicated effectively to all.		x			The safeguarding message is communicated mainly through the safeguarding display board and the website. ECW should ensure that the safeguarding message is being communicated from the front and that members of the congregation feel safe within the culture of ECW to raise concerns. There need to be clear messages that concerns will be taken seriously and will be actioned with the appropriate level of confidentiality and information sharing processes.
6.2	All workers have been trained to actively listen to those in their care.		x			There has been some listening training as part of safeguarding training. It would be useful for key members of staff to also attend some active listening training. This will be especially important for church wardens, safeguarding officers who are the most likely to deal with complaints or concerns raised.
6.3	All Workers know how to safely communicate using Information Communications Technologies.	x				There is clear guidance in Safe Church 2020 and there was evidence of knowledge demonstrated by key role holders spoken to.
6.4	Workers have been trained and equipped to communicate				x	A small group of church family members independently provide and

	effectively with those with special needs and disabilities.				co-ordinate support during services for these individuals
6.5	All workers know how to listen appropriately to a disclosure of abuse.	x			High levels of training at C1, C2. In interviews with key role holders there has been a demonstrable knowledge of how to manage a disclosure. There are, however, lessons to be learned regarding communication with the diocese and a need for some rebuilding of relationship between ECW and the diocese.
6.6	The organisation encourages the involvement of those using the facilities to be involved in decision making and improving services.	x			There are opportunities for role holders, ministry trainees, elders, trustees and members to contribute to and question decisions and issues throughout the year through formal and informal processes. Examples – standing items on agendas, online portal for feedback, Q and A sessions on issues and decisions, staff meetings specific question at beginning. church council
6.7	The organisation has established relationships of trust with outside agencies.		x		Whilst there are some relationships with outside agencies these tend to be within the CE constituency. The relationship with the Diocese needs to be rebuilt and needs to be healthier. Both parties need to take responsibility for this and if necessary, mediation needs to be accessed.
6.8	The organisation has made provision for receiving feedback from users and others on the services it provides.	x			Online portal for feedback, examples – standing items on agendas, online portal for feedback, Q and A sessions on issues and decisions, staff meetings

						specific question at beginning. church council
6.9	The organisation should ensure relevant information and resources are readily available.	x				<p>There is a library where people can borrow or buy books. Escaping the Maze of Spiritual Abuse is available along with other relevant books.</p> <p>Domestic Abuse posters are visible on the inside of all female toilet doors.</p>

Overall Comments on Standard (including actions where appropriate)

The safeguarding message is communicated to the members by the safeguarding display board and on the website. It is important that there is a clear effort to communicate this from the front. There is a need to communicate the role of the safeguarding coordinator. There need to be clear messages that concerns will be taken seriously and will be actioned with the appropriate level of confidentiality and information sharing processes.

Whilst there are some listening skills within the role holders it would be useful for key members of staff to also attend some active listening training. This will be especially important for church wardens, safeguarding officers who are the most likely to deal with complaints or concerns raised.

There is clear guidance regarding safe communication through ICT. Role holders demonstrated a knowledge of these principles and practices.

Whilst there was a clearly demonstrated knowledge of how to deal with a disclosure, there is a need for the relationship with the diocese to be rebuilt and further developed. The relationship with the diocese has been historically poor. There is evidence that there are still barriers in communication between ECW and the diocese.

The relationship with the Diocese needs to be rebuilt and needs to be healthier. Both parties need to take responsibility for this action and if necessary, mediation needs to be accessed

The processes for gaining feedback and involving members of ECW do seem to be in place. I would however urge ECW to consider how this extends to past members who have been impacted by JF's behaviour.

There has been improvement in healthy Christian culture. It is important that healthy Christian cultures are intentional in continuing to improve the culture. There are still some aspects of past culture that need further work as recognised in recommendations made.

There is a recognition that healthy Christian cultures extend beyond the role holders and volunteers. ECW should consider how they communicate these healthy Christian cultures to the whole congregation. For there to be a wholly healthy Christian culture

the whole congregation needs to be aware of expectations and play their role in developing this.

Standard 7 RESPONDING TO CONCERNS		Fully met	Part met	Not met	N/A	Comments/Evidence
Every organisation that is in contact with, or provides services for children, young people or adults at risk at risk must be able to respond appropriately to concerns or allegations of abuse.						
7.1	All workers receiving an allegation of abuse (of children) know how to respond appropriately.	X				All workers have attended C1 Safeguarding training and have clear guidance. It is useful to remind and reinforce the sharing of concerns on a regular basis.
7.2	The organisation makes support available for families where Children's Social Services are involved.	X				
7.3	The safeguarding coordinator and deputy know how to respond where there is physical injury or symptom of neglect involving a child.	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again, the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.4	The safeguarding coordinator and deputy know how to respond where there are concerns or allegations of sexual abuse involving a child.	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again, the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.5 - 7.6	Where there is a concern/allegation of abuse involving a child, the safeguarding coordinator and deputy know the procedure	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again,

	for contacting Children's Social Services and what response to expect from them.					the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.7	The safeguarding coordinator and deputy know how to respond where there are concerns of possible abuse involving a vulnerable adult.	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again, the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.8	The safeguarding coordinator (or deputy in their absence) knows how to respond in an emergency where there are concerns of abuse involving an adult at risk of harm.	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again, the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.9	The safeguarding coordinator and deputy know what Adult Services / Social Care should do when a referral is made to them.	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again, the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.10	All workers should know how to respond to an allegation of abuse made by a third party.	X				All workers have received C1 training and are aware of how to respond to a third-party allegation.
7.11	All workers must know the reasons for not contacting the parent /carer or alleged abuser and act accordingly.	X				All workers have received C1 training.

7.1 2	The safeguarding coordinator, deputy and leadership know how to respond where there is an allegation against a worker.	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again, the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.1 3	The safeguarding coordinator, deputy and leadership know how to respond to possible false allegations of abuse.	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again, the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.1 4	The safeguarding coordinator and deputy know how to respond to allegations against children and young people.	X				The safeguarding coordinators both demonstrated clear knowledge of how to respond to concerns. Again, the relationship with the diocese here is key in being able to communicate safeguarding concerns effectively.
7.1 5	All workers understand the facts surrounding bullying as a form of abuse.	X				There is a much better understanding of the impact of bullying as a form of abuse. There is much clearer guidance in the HR handbook.
7.1 6	All workers understand the facts surrounding domestic violence and how to respond.	x				C1 training completed by all workers apart from new starters that are in progress Some have completed DA training.
7.1 7	All workers understand the links between mental illness and abuse.	x				C1 training completed by all workers apart from new starters that are in progress.

7.1 8	All workers understand the links between alcohol and drug misuse and abuse.	x				C1 training completed by all workers apart from new starters that are in progress.
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Overall Comments on Standard (including actions where appropriate)

A high level of training is evident and evidenced through Klemi. The knowledge was evidenced as applied through the role holders that were spoken to. The safeguarding officers were very knowledgeable about how to respond in each situation. There is a key lesson to be learned here about how vital the relationship between the parish church and the Diocese is to effective and trusted communication around safeguarding. There is work to be done to rebuild the relationship with the diocese and to establish a more open, trusted, and healthier relationship. This action is the responsibility of both parties and there may be a need for mediation to rebuild this relationship.

It is recommended that where external advice is sought that there is a formal process of commissioning and that this process includes a formal information sharing agreement. Where information is being shared, even on a non-identifying basis, the person whose information is being shared should be informed what information will be shared and with whom in line with the information sharing agreement, for the purpose of seeking advice.

Standard 8 PASTORAL CARE		Fully met	Part met	Not met	N/A	Comments/Evidence
Every organisation that is open to, or provides activities for children, young people and adults, should ensure pastoral care and support is available to all those affected by abuse.						
8.1	There are people within the organisation who are trained in listening skills and are available to those who wish to talk.	x				Further training in active listening may be useful here.
8.2	The organisation recognises the difference between counselling and pastoral care and that counsellors must be appropriately qualified.	x				No counselling is undertaken at ECW but there is clear guidance around this.
8.3	The organisation has ensured there is confidentiality and accountability for those in the counselling / pastoral care roles.	x				ECW has a privacy statement. Counselling roles are not undertaken but people are signposted to relevant counsellors or people organise own

						counselling and ECW pay the bill. There is clear guidance for those undertaking pastoral care regarding confidentiality.
8.4	The organisation is familiar with and acts in accordance with the law and good practice relating to age and consent for medical treatment.	x				Clear guidance is given in Safe Church 2020.
8.5	All workers, counsellors and pastoral carers take issues of touch seriously and know how to respond appropriately.	x				There is clear guidance for all workers and volunteers in the Church of England Code of Safer Working Practice. A copy is given to every worker. A record is kept of each pastoral care meeting by the individual pastoral carer. It may be useful for this to be a central record to ensure that there is oversight and that any dependent relationships can be picked up in order to protect the integrity of pastoral carers.
8.6	All workers, counsellors and pastoral carers understand and know how to respond appropriately to the effects of physical abuse.	x				Clear guidance is given in the guidelines for the professional conduct of clergy.
8.7	There is an understanding throughout the organisation and an appropriate response to the effects of emotional and spiritual abuse.		x			Clear guidance is given in the guidelines for the professional conduct of clergy. Some spiritual abuse training may be useful when this is available.
8.8	Counsellors and pastoral carers in particular have an understanding of future relationships and sexual issues for those who have been affected by abuse.	x				Clear guidance is given in the guidelines for the professional conduct of clergy.

8.9	Workers, leaders, counsellors and pastoral carers understand the complexities surrounding forgiveness to ensure they respond appropriately to those affected by abuse.		x			At the meeting with Safeguarding staff and volunteers there was a clear understanding demonstrated by all. It is important that this is ingrained in the wider culture of ECW and to ensure the Care Co-ordinator role incorporates this into their role.
8.10	The organisation has ensured that all pastoral carers know how to respond to concerns of abuse and have a clearly defined role which is conveyed to the person receiving the pastoral care.	x				All pastoral carers have undertaken safeguarding training to at least C1 level.
8.11	The organisation has ensured that the integrity of workers is safeguarded.	x				There is regular supervision and all meetings take place in public places.
8.12	The organisation takes gender preference of the counsellor or pastoral carer seriously.	x				A women's worker is in place.
8.13	Organisations have ensured that practical help is provided for those affected by abuse, particularly where there is a formal investigation.	x				ECW have a Care Co-ordinator in place that has been really useful in responding to non-recent behaviours that have been harmful. There is a clear process of signposting to appropriate support and there is a fund for independent counselling that can be accessed anonymously.

Overall Comments on Standard (including actions where appropriate)

No counselling is undertaken by ECW. Where pastoral care is given this is delivered safely, sensitively and in line with guidance. The role of Care Co-ordinator is and will continue to be a vital role at ECW.

Standard 9 MANAGING THOSE WHO MAY POSE A RISK		Fully met	Part met	Not met	N/A	Comments/Evidence
Organisations must have strategies in place to supervise and manage individuals who pose a risk to, have committed, or been accused of, sexual or other crimes against children, young people and adults.						
9.1	There are those within the organisation who have a good understanding of the issues surrounding sexual / violent offenders.	x				The safeguarding officers spoken to demonstrated a good understanding and were clear what was their role and what was the role of the diocese.
9.2	There are those within the organisation who have a good understanding of the issues surrounding 'grooming'.	x				The safeguarding officers spoken to demonstrated a good understanding.
9.3	There are those within the organisation who understand how the public can be protected from sexual/violent offenders.	x				The safeguarding officers spoken to demonstrated a good understanding.
9.4	There are those within the organisation who understand the principles of sharing information in relation to those who pose a risk.	x				The safeguarding officers spoken to demonstrated a good understanding and were clear what was their role and what was the role of the diocese.
9.5	There are those within the organisation who know how to manage people who pose a risk.	x				The safeguarding officers spoken to demonstrated a good understanding and were clear what was their role and what was the role of the diocese.
9.6	There are those within the organisation who know how to draw up and manage a written contract with people who pose a risk.	x				The safeguarding officers spoken to demonstrated a good understanding.
9.7	There are those within the organisation who know how to carry out a risk assessment and implement strategies to manage those who pose a risk.	x				The safeguarding officers spoken to demonstrated a good understanding but were clear that risk assessment was the responsibility of the diocese.

9.8	There are those within the organisation who know how to provide support for all who are affected when there is an allegation against someone who may pose a risk.	x				The safeguarding officers spoken to demonstrated a good understanding.
9.9	There are those within the organisation who know how to manage the response of members of an organisation where there has been an allegation against someone who may pose a risk.	x				The safeguarding officers spoken to demonstrated a good understanding. There are some particular difficulties here in relation to this area. There is still division around this.
9.10	There are those within the organisation who know how to manage both the alleged perpetrator and the victim where they are involved in the same organisation.	x				The safeguarding officers spoken to demonstrated a good understanding. There are some particular difficulties here in relation to this area. There is still division around this. This a complex area and there is a need for ongoing external support needed in this area. Whilst JF is no longer in the organisation there have been continued difficulties in managing his behaviour.
9.11	There are those within the organisation who know how to manage an alleged perpetrator where there is some acceptance of responsibility.	x				The safeguarding officers spoken to demonstrated a good understanding. There was a recognition of some of the difficulties in this area and also where there is not a full acceptance of responsibility.
9.12	There are those within the organisation who know who to contact in relation to the treatment of offenders.	x				The safeguarding officers spoken to demonstrated a good understanding. There are some particular difficulties here in relation to this area. There is still division around this.

Overall Comments on Standard (including actions where appropriate)

There was a high level of knowledge here and all those spoken to were clear where ECW was responsible and where the diocese was responsible. However, the effectiveness of safeguarding here is reliant on a good working relationship which

reinforces the need for further work to be undertaken to improve the relationship between ECW and the Diocese.

Standard 10 WORKING IN PARTNERSHIP		Fully met	Part met	Not met	N/A	Comments/Evidence
All organisations involved with children, young people or adults at risk must ensure they adopt safe working practice in every area.						
10.1	Organisations involved in overseas work with children, young people and adults at risk have ensured a safeguarding policy is in place, including safer recruitment.		x			Those that are funded through ECW must be with a professional mission organisation. There is a committee that looks at funding and undertakes due diligence. The duty of care should be revisited where a risk assessment is undertaken on an individual. If a funded individual is a victim of JF's behaviours then the duty of due diligence should also examine what support that individual needs. Support and advice should be sought from the diocese on these matters.
10.2	Organisations working overseas are aware of differences in law, culture and practice, but do not compromise safeguarding.		x			ECW's mission funding committee should ensure that the professional mission organisation has these measures in place.
10.3	Organisations working overseas know how and agree to respond appropriately to concerns or allegations of abuse.		x			ECW's mission funding committee should satisfy itself that the professional mission organisation has addressed any allegations made and has procedures in place to respond appropriately.
10.4	Organisations working overseas have adopted good working practice where there are concerns or allegations of abuse.		x			See 10.3

10.5	Organisations working overseas that run child sponsorship programmes have adopted safeguarding policies for conditions of sponsorship and visits by sponsors.				X	No child sponsorship programmes are run.
10.6	Where children and young people are placed with host families, the organisation has adopted a policy and safe working practice.				X	
10.7	Organisations running or participating in day or residential activities for children, young people and adults at risk of harm have ensured appropriate additional safeguarding measures are in place.				X	
10.8	An organisation letting premises to outside individuals or groups has obtained their agreement to abide by or a similar safeguarding policy.	x				There are 2 organisations that hire premises from ECW. The expectation is that if they do not have a safeguarding policy, they abide by ECW policy.
10.9	Organisations working in schools have an agreement with the school as to what they are providing.				x	No work is undertaken through ECW in schools.
10.10	Proprietors of independent schools have ensured appropriate safeguarding policies and good working practice are in place.				x	
10.11	Organisations running activities for children have ensured statutory requirements for day care providers are being met.				X	
10.12	Counselling services have ensured counsellors are trained to a professional standard and agree to comply with safeguarding procedures.				x	Funding for counselling is available but ECW do not arrange this. The individual arranges and bill is paid by ECW.
10.13	Organisations offering pregnancy advice have adopted a clear policy regarding those under the				x	

	age of consent, under 18s and adults at risk of harm.					
10.14	The organisation agrees to challenge and, where appropriate, report unlawful and abusive practices amongst new and emerging communities.		x			It is vital that ECW ensure that they challenge any abusive or unlawful practices alongside any cultural issues within any church plant that is established. All recommendations for ECW should be considered in establishing any church plant or ministry that is associated with ECW.
Overall Comments on Standard (including actions where appropriate)						

Those that are funded through ECW must be with a professional mission organisation. There is a committee that looks at funding and undertakes due diligence. The duty of due diligence should be revisited where a risk assessment is undertaken on an individual. If a funded individual is a victim of JF's behaviours, then the duty of due diligence should also examine what support that individual needs. Support and advice should be sought from the diocese on these matters. Wherever there is new information that comes to light this should be included in the risk assessment.

As part of the safeguarding audit ECW were asked if they supported any mission work. The response was that they didn't. It has become evident that they do support mission partners.

The ECW committee for mission funding should reassure itself that its duty of due diligence has been undertaken for any mission partner that is funded. This reassurance should ensure:

- that professional mission organisations that are used have adequate safeguarding policies and practice
- that this includes an awareness of different laws and cultures
- that any risk associated with mission partners is assessed and revisited in response to any new information
- that there is an assessment of support needed if that person has been affected by the behaviour of JF

There are 2 organisations that hire premises from ECW. The expectation is that if they do not have a safeguarding policy, they abide by ECW policy.

SUMMARY OF AUDIT

Contained within main report.

RECOMMENDATIONS

Contained within main report.

Audit undertaken by:	Simon Plant
Date completed	30/10/2020

ACTION PLAN

Standard	Action to be taken	By who	By when
Standard 1	To review process for appointment of elders to ensure transparency including engagement from the congregation. This should create accountability and encourage diversity.		
Standard 2	To ensure that clear safeguarding messages are regularly given from the front and that all members of the congregation are clear who the safeguarding co-ordinator is, how to report a concern and that when a concern is raised it is taken seriously and treated with appropriate confidentiality. This will give all confidence to those in the congregation and ensures that they feel safe in passing on a concern.		
Standard 3	<p>To continue further development of the safer recruitment process in relation to volunteers. ECW should ensure this includes volunteer role profiles, some form of informal interview before beginning role, DBS where appropriate and in line with DBS guidance, probationary periods for those volunteering to ensure role is a best fit for everyone and volunteers are suitable for their role.</p> <p>To extend the offer of an exit interview to all volunteers, ministry trainees and members of the congregation who leave (in addition to the current exit interviews for staff).</p>		
Standard 4	See Standard 3		

Standard 5	<p>To explore adding an external stage to the complaints process to ensure that if the complaint is not resolved at trustee level there is a further independent review of the complaint handling.</p> <p>ECW should ensure that a process for recording gifts, rewards etc., is put in place. In relation to favouritism, and especially due to issues discussed in this report, efforts need to be made to ensure that not only is there no favouritism but that there is a transparency around this.</p> <p>If there is a continuation of lodging arrangements, it would be prudent to ensure there is a formal process and support policy for those who lodge. This should include risk assessment where there is known risk.</p> <p>ECW should consider whether the policy in relation to abusive images of children could be strengthened further by listing this as gross misconduct in the HR handbook.</p>		
Standard 6	<p>See Standard 2 for communicating safeguarding messages.</p> <p>To work effectively with the diocese and the CofE to rebuild the relationship with the diocese and to establish a more open, trusted, and healthier relationship at all levels but especially in relation to safeguarding. This action is the responsibility of both parties and there may be a need for mediation to rebuild this relationship.</p> <p>ECW to consider how to extend feedback processes and ensure effective trusted communication to past members who have been impacted by JF's behaviour.</p> <p>To ensure that the whole congregation have an awareness of healthy Christian culture principles and understand that the congregation as a whole has a role in shaping the culture of an organisation.</p>		
Standard 7	See standard 6 regarding rebuilding the relationship with the Diocese.		

	It is recommended that where external advice is sought that there is a formal process of commissioning and that this process includes a formal information sharing agreement. Where information is being shared, even on a non-identifying basis, the person whose information is being shared should be informed what information will be shared and with whom, in line with the information sharing agreement, for the purpose of seeking advice.		
Standard 8	No Action		
Standard 9	No Action		
Standard 10	<p>The ECW committee for mission funding should reassure itself that its duty of due care has been undertaken for any mission partner that is funded. This reassurance should ensure:</p> <ul style="list-style-type: none"> • that professional mission organisations that are used have adequate safeguarding policies and practice • that this includes an awareness of different laws and cultures • that any risk associated with mission partners is assessed and revisited in response to any new information <p>that there is an assessment of support needed if that person has been affected by the behaviour of JF</p> <p>The actions outlined here along with recommendations for ECW should be implemented for any new ministry or church plant from ECW.</p>		

Completed by:	Simon Plant
Date	30/10/2020

Appendix Two:

Timeline of the development of safeguarding in the CofE

Many of these changes were prompted by the findings of the Archbishopal Visitation, which served to expose the serious failures and injustices of the Church's existing systems. As Archbishop Justin Welby summarised:

"The increased activity in relation to safeguarding has come out of a deep sense of conviction that there needed to be repentance for our past failures, and a consistency and quality of practice of safeguarding at all levels."

2014

National Safeguarding Panel (NSP) created as an advisory panel of external experts and survivors of sexual abuse, which meets four times each year. It provides the Archbishops' Council and House of Bishops with high-level strategic advice and direction on safeguarding. It also performs a key role in the development of national policy and guidance, in partnership with the Methodist Church.

2014

The House of Bishops approved the development of an independent programme of diocesan safeguarding audits. The Social Care Institute for Excellence (SCIE) was commissioned to deliver this programme, and all dioceses had been audited by the end of that year. The audits are currently being extended to cathedrals, Lambeth Palace and Bishopthorpe Palace.

2015

The National Safeguarding Team (NST) was established. The NST provides advice and support to dioceses, cathedrals and National Church Institutions in respect of policies and training. Full-time National Safeguarding Adviser appointed.

May 2016

The House of Bishops approved the creation of the National Safeguarding Steering Group (NSSG). Its primary role is to offer strategic oversight of national safeguarding activity. It has a much more extensive remit than the NSP, which is an advisory body. Bishop Peter Hancock referred to the NSSG as *"the main body in the Church of England for overseeing national safeguarding policy and activities at national level"*.^[5]

July 2016

SCIE identified that *"there has in recent years been, and continues to be, progress towards embedding a safe culture"*.^[2]

2018

The budget for the NST was £1.6 million. This included the appointment of a part-time Human Resources Adviser, who provides specialist recruitment advice to dioceses and other church bodies. The expansion of the NST has considerably improved the quality of training, policy and practice guidance within the church.

2018 onwards

NST is currently in the process of developing the *Safe Spaces* project in collaboration with the Roman Catholic Church. This project represents a single national resource that can be accessed easily and swiftly. It provides pastoral support for victims of abuse and allows for personal contact via a telephone helpline or email.

January 2017

The Diocesan Safeguarding Adviser Regulations came into force. These were issued by the House of Bishops under Canon C30, which was created in response to the findings of the Chichester Commissaries. The Regulations require all 42 dioceses to appoint a Diocesan Safeguarding Adviser (DSA). They allow the DSA to act independently of the bishop and diocese. It is made clear that the DSA may make a referral to the police where he or she considers that to be desirable. The regulations present a specific example of the DSA's power to override decisions made by clergy or others within a diocese.

Canon C30.2(1) gives an archbishop the power to direct a bishop who holds office in his or her province or has authority to officiate in it or in a diocese, to undergo a risk assessment. It also enables each archbishop to direct the other archbishop to undergo a risk assessment. Canon C30(2) confers a corresponding power on a diocesan bishop, in relation to priests or deacons who have authority to officiate in the diocese.

2017

The national church issued a further policy document entitled *Responding to Serious Safeguarding Situations*.^[7] This clarified the role and boundaries of a support person to victims once a disclosure of abuse has been made. It reiterates that all victims must be allocated a supporter, who may be an authorised listener specifically trained to hold this role.

October 2017

The NSSG also agreed further guidance called *Key Roles and Responsibilities of Church Officers*. This document provides further detail on the duties of key personnel, including the Diocesan Safeguarding Adviser.

September 2017

The NST has issued a series of mandatory core safeguarding training modules. The 'C4' training module relates to the handling of disclosures of abuse. This material was piloted with the archbishops in June 2016, and its delivery to each diocese began in September 2017.

The NST recently supplied all dioceses with a copy of the *Parish Safeguarding Handbook*, which contains a range of tools to support day-to-day practice in the parishes. The handbook, along with all safeguarding policies and resources, is within an electronic manual, as part of the development of the national Safeguarding Hub. The Hub is designed to present safeguarding information in a user-friendly way, and is referred to by Bishop Hancock as a "one-stop shop for parishes and dioceses to access safeguarding resources".

Appendix Three:

Timeline of behaviours, disclosures and responses at ECW and wider organisations.

It is recognised that there is significant history prior to 1982. Any relevant significant events and themes prior to 1982 are dealt with within the main body of the report. The purpose of this timeline is to outline key activity within the scope of the Review.

1982	JF became Vicar of ECW.
1982	2 people told about naked swimming with JF.
1983	JF invited to become member of Nobody's Friends dining club ²⁰ .
1989	First mention by participants of lodgers staying with JF.
1990	JF questions about masturbation and other questions about sex very well known.
1991	Naked massages (first date mentioned by participants).
1993	Reform established.
1999 – 2003	Current Vicar was Curate at ECW.
1998	First mention by participants around naked saunas following squash. Carried on until 2018.
1999	Naked saunas known about and discussed between members of ECW.
2000s	Evidence given from participants that ice baths and beatings were part of prayer triplets.
2001	Ministry Trainee spoke to Curate (current Vicar) about JF bullying. Response was that JF domineering but have to work around his leadership style. (The current Vicar has expressed deep regret at this response).
2003 – 2010	Current Vicar in Delhi.
2005	Participant states that there is no safeguarding training at this point.
2006	A participant informed by friend of naked massages between themselves and JF.
2009 – 2012	Two examples of safeguarding agreements/covenants of care not being in place where clear risk existed.
2010	First mention of safeguarding training being undertaken. No real understanding of safeguarding prior to this.
2012	JF retires as Vicar of ECW.
Pre 2012	A culture of purposeful not keeping records at ECW.

²⁰ https://en.wikipedia.org/wiki/Nobody%27s_Friends

Pre 2012	Patterns of behaviour around spiritual abuse, coercion and control, manipulation and bullying were well known. Some role holders had been approached regarding this behaviour.
2012	Announcement of new Vicar and JF successor is made.
2012	Oblique article written for the Daily Mail.
2012	JF making life difficult for new Vicar through criticism of Vicar decisions.
2012	Culture began to change at ECW under new Vicar. Improvement in safeguarding arrangements from this time.
2013 – 2014	Rumours begin of allegations of behaviour of JF similar (not the same) to John Smyth in the background. JF name and allegations mentioned within the wider Conservative Evangelical constituency.
2013	ReNew established.
2017	Staff Handbook, HR policies introduced.
2017 – Sep 2018	First disclosures of JF behaviours to ECW.
2nd Feb 2017	The John Smyth story breaks.
2nd Feb 2017	An individual informed ECW that they had been in contact with a CoE minister who in turn had heard reports from some young adults about JF doing similar but less severe things as John Smyth to their fathers. Action taken: ECW passed on information immediately to Southwark DSA and also to the Chair of Titus Trust.
2nd Feb 2017	ECW Informed by another CofE minister that he knew of people (more than one) making allegations about “inappropriate behaviour” by JF. Action taken: ECW passed this information immediately to Southwark DSA and also to the Chair of Titus Trust.
3rd Feb 2017	Information passed to Hampshire Police by Southwark DSA regarding an allegation made. Hampshire Police concluded that no action would be taken. It was recommended that an independent safeguarding review should be undertaken on behalf of the Diocese of Southwark.
Feb 2017	JF’s PTO is removed by the Bishop of Southwark.
Feb-Sep 2017	JF repeatedly tells people that he returned his PTO in protest when a colleagues’ PTO was revoked. Also, JF telling people that he did not take his PTO back due to the CofE stance on LGBT. Creating a different narrative to Diocese of Southwark.
Mar 2017	Meeting of ‘Jonathan Fletcher’s preaching group’ reportedly attended by three CofE bishops.
25th May 2017	JF preaches at Burning Man at St Michael’s Chester Square CofE.
2nd Nov 2017	The Southwark DSA and Archdeacon met with ECW Vicar and the Safeguarding Officer of ECW to tell them that JF’s PTO had been removed. ECW state details were not given, but only the headline

that the Diocese has concluded that JF “represents or may represent a safeguarding risk to vulnerable adults.” ECW state they were told that no more details could be given, and that it was not ECW responsibility to ensure that the PTO removal was implemented. ECW responsibility was limited to ensuring JF did not officiate at ECW.

Jan 2018

JF invited to preach at the licensing of a bishop.

Aug/Sep 2018

A number of tweets were posted that indicated very serious allegations still to come about JF. Some of these tweets have since been removed.

Action taken: ECW ensured all tweets notified to Southwark DSA.

Around the same time, the Mail on Sunday journalist contacted the Diocese of Southwark over a period of several weeks for information on JF. No story was run.

24th Jul 2018

Chair of Anonymous Organisation asks if they can use the ECW building for “a service of thanksgiving” Vicar agrees and also accepts the invitation to preach.

20th Aug 2018

Order of service for the 13th September service was sent to ECW. That included the words “Interview - JF” and “Specifically THANKS to the Vicar, & congregation of ECW for welcoming us all here this evening. The Vicar will be our preacher. And also, WARM WELCOME to Anonymous and Anonymous who are such good friends of true Gospel work in the UK and globally with Gafcon. They will lead the Commissioning for his future work That wording confirms that this was an external service being held at ECW.

13th Sep 2018

The service of thanksgiving takes place. The Vicar didn’t inform anyone about JF’s lack of PTO because:

- He didn’t consider this to be an ECW service. We were simply lending our building for a mid-week service at which I’d been asked to preach.
- He didn’t think PTO covered an informal interview.
- He was not aware until a full 10 days later that there was anything of significant substance behind the withdrawal of JF’s PTO.

Sun 23rd Sep 18

The first victim opens up to Vicar to disclose he has been involved with mutual beating as part of a prayer triplet with JF.

Action taken: Vicar passed this on the following day to the Southwark DSA.

This was the first disclosure received, and in calling it in, the Vicar was effectively the whistle-blower for the whole thing that followed.

Sep 2018

External safeguarding advice sought by ECW.

1st Oct 2018

Diocese of Southwark hold first Core Group regarding JF. Diocese of Southwark, NST and Lambeth Palace representatives in attendance. ECW representatives not invited to the Core Group at this stage.

Sat 6th Oct 2018	A speaker is at ECW as part of the Wimbledon Bookfest event. The speaker tells one of our congregation that the Daily Mail article she wrote was about JF. The congregation member, with the speaker's permission, spoke to the Safeguarding Officer on Sunday 7th October to report this. Action taken: Safeguarding Officer of ECW passed this on the following day to the Southwark DSA.
Oct 2018 – present	ECW report every time a further disclosure has been received, this has been passed straight on the Southwark DSA. There was a flurry of disclosures after the 1st April letter to the ReNew leaders which had been co-signed by ECW Vicar, and other ReNew Leaders.
Dec 2018	Libel lawyer involved by JF.
Dec 2018	Group of individuals meet to discuss allegations against JF.
13th Mar 2019	Statement made at the ECW church prayer meeting.
1st Apr 2019	Serious Reportable Incident made to Charity Commission.
1st Apr 2019	Statement made to ReNew Network regarding the removal of JF PTO.
17th May 2019	Pastoral letter to ReNew network expressing the concerns regarding JF behaviour.
4th Jun 2019	ECW letter to Core Group. This letter challenges aspects of the approach of the Diocese of Southwark.
5th Jun 2019	Core Group meeting. ECW, Diocese of Southwark, NST and Lambeth Palace representatives in attendance.
22nd Jun 2019	First article in the Daily Telegraph.
23rd Jun 2019	Statement made to ECW members (brought forward due to Daily Telegraph Article) outlining concerns about JF behaviours.
25th Jun 2019	Repeat of statement due to people needing to hear again as are distressed.
27th Jun 2019	Statement made at the Evangelical Ministry Assembly.
9th Jul 2019	Reply to further questions to Charity Commission.
21st Jul 2019	Further update statement made to the ECW church Meeting.
22nd Jul 2019	Core Group Meeting. ECW, Diocese of Southwark, NST and Lambeth Palace representatives in attendance.
15th Sep 2019	Q & A session held at ECW.
2nd Oct 2019	Core Group Meeting. ECW, Diocese of Southwark, NST and Lambeth Palace representatives in attendance.
16th Oct 2019	Church seminar on healthy church leadership held at ECW.
5th Dec 2019	Independent Review by thirtyone:eight announced.
Feb 2020	Question asked at General Synod regarding the process for informing vicars of removal of JF PTO.
11th Mar 2020	CDM Resolved.

'A spokesperson for the Diocese of Southwark confirmed that following a complaint made under the Clergy Discipline Measure the Revd Jonathan Fletcher, 77, accepted a penalty by consent of prohibition from ministry for ten years.' This means that his name is added to the Archbishop's List which includes details of those who are not allowed to minister within the CofE. After the period of prohibition, there is no automatic return to ministry.

Appendix Four:

Extract from William Taylor's address at the ReNew Conference 2019:

Update on JF

Nowhere has this sense of acute weakness, frailty and failure been more evident for a number in our constituency than in the last six months since the revelations concerning Jonathan Fletcher's abuse have come to light. I want to address this for just a few moments.

First, our concern and compassion lies above all with those victims of Jonathan's abuse of power. A number of those here have been victims of abuse, in one way or another. We know the wretched traumas to which victims will have been exposed. For any who have not yet sought help and who want help, please do approach either thirtyone:eight or anyone listed on the Walking With website.

Secondly, Emmanuel Wimbledon have asked thirtyone:eight to undertake an independent Lessons Learned Review into the circumstances surrounding Jonathan Fletcher's activities and its context. Emmanuel is in discussions with thirtyone:eight and the Diocese of Southwark about this. Many of you will be aware of the work of thirtyone:eight, an independent Christian safeguarding charity (that used to be known as CCPAS). There is a clear commitment that the process itself will be entirely independent, and measures will be put in place to ensure that this is the case. We can expect to hear more about this independent Review in weeks ahead. There will be lessons for us all to learn.

At this stage there is not a lot more to say. Both personally, and as the Chairman of ReNew, I want to commend this independent Review to us. I certainly am eager to cooperate and collaborate with it. I hope others here will similarly be ready to support this important piece of work.

Finally, some have suggested we ought to devote significant time to lessons learnt at this conference over these two days. We hope you will understand that, in advance of an independent Review by thirtyone:eight that would be premature. However, we shall be praying for the victims, for Emmanuel, and for all affected tomorrow morning at our prayer meeting. And I hope that next year when our theme is Establishing Churches, we shall be able to give significant time to 'creating healthy Christian cultures'.

Anyone who has been affected by the events that led to this review or in reading this report may find the following links helpful:

Thirtyone:eight

Helpline: 0303 003 1111 (Quoting: 'Southwark 2019')

www.thirtyoneeight.org

Association of Christian Counsellors (ACC)

<https://www.acc-uk.org>

British Association of Counselling and Psychotherapy (BACP)

<https://www.bacp.co.uk>

Minister & Clergy Sexual Abuse Service (MACSAS)

<http://www.macsas.org.uk>

National Association for People Abused in Childhood (NAPAC)

<https://napac.org.uk>

Samaritans

<https://www.samaritans.org>

or by phone on 116 123

The Survivors Trust

<https://www.thesurvivorstrust.org>

Call us **0303 003 1111**
email us **info@thirtyoneeight.org**
or visit **thirtyoneeight.org**

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Charity No. 1004490, Scottish Charity No. SC040578



Creating safer places. Together.