#### CHURCH OF ENGLAND

# CATHEDRALS WORKING GROUP

**Consultation Summary** 

14 June 2018

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## Cathedrals Working Group Response to Consultation Feedback EXECUTIVE SUMMARY

This document lists the number of responses and their source and describes how these responses were analysed. It emphasises that in general the proposals met with wide support. The document then goes on to analyse the main themes emerging from the consultation responses. It argues that the overall coherence of the proposals are being maintained in the final report but agrees that many decisions are for the implementation stage. The document then goes on to list the CWG's considered views on the points raised on each section of the report. These are as follows:

#### Governance

- Clarifying the composition and operation of the Chapter and the roles and duties of the Vice Chair
- Requesting further work on insolvency arrangements for cathedrals.
- Recognising that further work needs to be done regarding the position of Parish Church Cathedrals
- Recommending that the new Third Church Estates Commissioner should convene and chair a Cathedrals Support Group to co-ordinate and oversee the activities of the NCIs in relation to cathedrals
- Recommending that Cathedral Councils should be abolished

#### Leadership, Management and People

- Clarifying the section on the roles, duties and accountability of residentiary canons, including their operational accountability to Chapter via the dean
- Clarifying the use of MDR to combine operational performance appraisal alongside professional and ministerial development

#### **Finance**

- Clarifying that the recommended list of auditors should include a range of local and regional firms
- Clarifying the recommendation that the CFO should be appropriately qualified for the needs of the cathedral concerned
- Revising the reporting recommendation so that Accounts should be supplied to NCIs at the year-end only

#### **Buildings**

- Clarifying that funds should be in place for each stage of a project (rather than for the entire project)
- Continuing support for a dialogue with government on a National Cathedrals Fund

#### Safeguarding

• Endorsing the proposals set out in the draft with some clarification regarding overlapping regulatory regimes and joint working with the diocese

#### **Charity Commission Regulation**

• Continuing to support cathedrals' registration with the Charity Commission but recognising the complexities, suggesting contingent approaches and calling for dialogue with the Charity Commission on how best to make this happen

The analysis concludes by thanking all those who responded. The Annex sets out a list of those who did so.

### CATHEDRALS WORKING GROUP Summary of Consultation Feedback and CWG Response

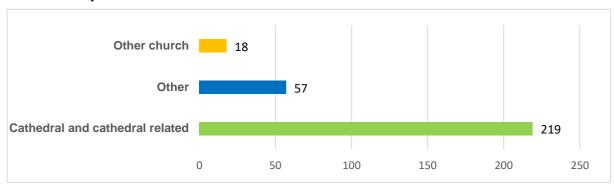
#### Introduction

- The Cathedrals Working Group (CWG) published its draft report for consultation on 14 January 2018. The consultation closed on 28 February 2018. The report was published in draft form on the Church of England website and was also widely circulated around the cathedrals community and beyond to the wider Church, civil society audiences, Government departments, heritage organisations and others.
- 2. In this summary it has not been possible to mention every individual response, and the approach taken here has been to address the concerns/criticisms which came up most frequently in the feedback
- 3. In quantitative terms there was a considerable degree of support for the majority of the recommendations, alongside a small minority vociferously opposed to some or all of what was proposed. The report has clearly surfaced and in certain places crystallised some significant issues for cathedrals and the wider Church. It has stimulated a debate and is already provoking some change.
- 4. After reviewing the consultation responses, the CWG is not proposing a major revision of our Report. We stand by most of the central recommendations but have amended the Report at appropriate points in response to the constructive criticism received in a number of areas.
- 5. Significant points of detail were raised in the feedback, and our view is that many of these need to be addressed in the Implementation phase. We hope that the Archbishops' Council will work closely with cathedrals to deliver an outcome that is effective and fit for purpose, one which will command assent from cathedrals and dioceses alike.

#### Types of responses received

- 6. The majority of responses (294) were received using an online survey. There were 16 responses received sent by email with a further 38 responses in the form of a letter.
- 7. The types of responses are set out in the chart below:

#### Overall response



ANSWER CHOICES	RESPONSES	
Cathedral and cathedral related	74.48%	219
Other church	6.12%	57
Other	19.38%	18
TOTAL		294
6.77%		

- 8. From cathedrals themselves there were 44 responses from cathedral Chapters/corporate responses, 9 from deans, 7 from diocesan bishops, 23 from residentiary canons and 8 from Cathedral Administrators.
- 9. A full list of those individuals or organisations who responded (who wished to be named) is set out at the end of this consultation analysis.
- 10. Respondees included the following:
  - Cathedral related (about 75% of respondees): Cathedral Chapters, deans, residentiary canons, individual Chapter members and clergy, Cathedral Administrators, cathedral Council members, chairs of finance committees, Fabric Advisory Committee (FAC) members, heads of finance, lay staff, safeguarding officers, cathedral volunteers & congregation, Cathedral representative organisations, cathedrals Administrators and Finance Association (CAFA), Cathedral Architects Association (CAA), the Cathedral Fabric Commission for England (CFCE), the Cathedral Organists Association (COA) and the Association of English Cathedrals (AEC)
  - Wider church responses (about 6%) such as those from diocesan bishops, suffragan bishops, archdeacons, diocesan secretaries, diocesan safeguarding officers, the AC Finance Committee and the Church Commissioners
  - Other respondees (19 % of responses): The Charity Commission, the Charity Finance Group, cathedral grant funders, the Cabinet Office, audit firms, local authorities, local residents, lord lieutenants and high sheriffs
- 11. There were also two Synod fringe meetings, an AEC conference consultation and various individual conversations held.
- 12. In addition, the Church Commissioners requested an independent specialist to review the governance proposals. Mike Hudson of the Compass Partnership supplied an analysis of these and how they relate to best practice in the secular not-for-profit sphere.
- 13. Pelham Allen, a restructuring specialist, raised some important questions about insolvency arrangements, a response to which has been incorporated into the Finance section of the final report.

#### Shape of the questionnaire

14. The questionnaire accompanying the draft Cathedrals Working Group Report consisted of two sections. The first section asked some specific questions on key

- aspects of the recommendations and invited respondees to say whether they agreed, disagreed, partially agreed or were unsure about the questions posed.
- 15. The second section of the questionnaire invited respondees to indicate whether in general they agreed with the proposals set out in each section of the draft report, namely Mission and Ecclesiology, Governance, Leadership and Management, Finance, Buildings and Safeguarding and to offer some general comments on each if they wished to do so.

#### The consultation analysis process

- 16. Detailed analysis of the consultation responses was carried out by staff of the Archbishops' Council. Data from the responses to the quantitative (closed) questions in the consultation (e.g., those that invited 'yes', 'partially agree', 'no', 'don't know' responses) was inputted and analysed. Responses were divided into three categories as follows:
  - Cathedrals and cathedral-related (Chapters, Councils, individual cathedral clergy and lay staff, cathedral congregations etc)
  - Other church respondents (diocesan bishops, diocesan secretaries and diocesan staff, parish priests, NCIs etc.)
  - Other (member of the public and local community, Government departments, heritage sector, professional bodies, local authorities, lord lieutenants and high sheriffs etc)
- 17. All qualitative responses (those responses to the open questions in the questionnaire or where a respondent had written a paper, letter or email rather than answering specific questions) were also logged and analysed. This was done by allocating the responses to the main themes in the questionnaire ie Governance, Ecclesiology, Leadership and Management, Finance, Buildings and Safeguarding.
- 18. A number of in-depth responses were received from the AEC, Cabinet Office, some Royal Peculiars and some individual bishops and deans. These were analysed and fed into the consultation analysis.
- 19. The numbers of responses reported in this analysis are actual numbers and have not been weighted. It should also be remembered that not all respondents answered every question. Some responded directly to the questions, some answered only parts of questions, and others commented more broadly on the overall content of the consultation.
- 20. A breakdown of the responses to each of the quantitative (closed) questions in Section One of the questionnaire is set out later in this document.

#### Main themes emerging

21. There was a considerable degree of support for the majority of the CWG's recommendations from most groups who responded. In particular, it should be noted that the AEC, the representative body for cathedrals, has indicated its willingness to work with its membership on implementation of the Report's recommendations, addressing the non-legislative recommendations as soon as practicable

#### RESPONSE TO CONSULTATION FEEDBACK

- 22. Where criticism was made, the spectrum of response illustrated the tension present in the Group's work. It ranged from those who felt that we should have gone much further in imposing a secular governance framework on cathedrals, to those who believed that our proposals undermined the alterity of a cathedral's place in the ecology of the Church of England.
- 23. The Working Group accepts that the regulatory framework for civil society has changed beyond recognition in recent years, and the profile and significance of cathedrals in English society and the Church therefore requires a higher degree of accountability, scrutiny and regulation than has previously been the case. But we do not believe that a purely secular model is the right way to achieve this. We continue to favour a balanced approach which holds the particularities of a cathedral's mission, ecclesiology and spirituality in creative tension with best practice in governance and management.
- 24. The next few sections of this document summarise the main themes emerging and the CWG's responses to them.

#### "Cherry-Picking": Points Raised

25. There was widespread resistance amongst respondees to the request in the draft report that **the recommendations be accepted en bloc and without 'cherry-picking'** by taking some recommendations and ignoring or changing others. They argued that an "all or nothing' approach was both impracticable given the Synodical stages involved in amending legislation, and ill-advised since they viewed some of our recommendations as either wrong or requiring considerable further work before they could be accepted as viable.

#### "Cherry-Picking": CWG Response

- 26. The reason behind this recommendation was our belief that the excellent recommendations of the Howe Report had been considerably diluted in the implementation stage in a way which reduced their overall coherence. This weakening of the overall vision of the Howe Report was in part due to the 'horse-trading' that is an inevitable part of the various legislative stages of the Synodical process. We were trying to urge against something similar happening with our report.
- 27. We have reflected on the points made by respondees to the consultation and we accept that there is some truth in them. We are also very much aware that implementation is out of our hands, although we have offered input in to an outline **implementation plan** for Archbishops' Council, which we hope will give momentum and focus to enacting the changes which we believe are required to help ensure the sustainability of cathedrals and their mission into the future.
- 28. With this proviso in mind, we retain the general view that whatever adjustments need to be made to some of our proposals cathedrals and the wider church must work together to retain an overall coherence to what is being proposed.

#### **Governance: Points Raised**

29. The majority of the responses we received concerned the **governance** proposals. In general, respondents were largely positive about most of them, but some questions and comments were made on the detail. Points raised included the following:

- The composition of Chapter including number of members, ratio of nonexecutive to ordained members, frequency of meetings and the permissible number of non-executive members who were not communicant Anglicans
- Attendance and voting rights of the Chief Operating Officer and other senior staff on Chapter
- Whether the Chapter should on occasion meet without the dean
- Composition and chairing of the meetings of the Senior Executive Team
- Fragmentation of NCI engagement with cathedrals
- Whistleblowing policies for cathedrals.

#### **Governance: CWG response**

- 30. Our recommendations relating to new governance structures are developed in order to align cathedrals more closely to best practice in third sector organisations whilst recognising the ecclesiological necessity of preserving the clear leadership of the dean and the paramount importance of a praying community shaping the ethos and values of the cathedral's life. Some specific points raised on governance and our responses to them are set out below:
  - In our view, the Chief Operating Officer should normally attend meetings of the Chapter but should not be a member as an employee of the cathedral. The justification for the dean and residentiary canons being members of the Chapter – which is set out in the governance Chapter of the report – does not apply to the COO. Unlike in the case of the college of clergy, there is nothing inherent in the nature of a cathedral that would justify the COO being a member of the Chapter.
  - We agree that the composition and chairing of the Senior Executive Team (management group) should be largely left to the discretion of individual cathedrals, depending on their needs and staffing structures.
  - As trustees with ultimate responsibility for the organisation, it will be important
    for the Chapter to have an opportunity to discuss the dean's performance as
    the chair of Chapter. In line with the current Charity Governance Code, the
    CWG suggests that there should be occasional meetings of the Chapter in the
    absence of the dean to review this.
  - We retain our view that the Chapter should have a non-executive majority in membership and at least two-thirds of the non-executives should be lay.
  - Some respondees pointed out that larger cathedrals with more than 4
    residentiary canons will need to have a Chapter size in excess of 12 if nonexecutives are to be in the majority. We accept this and have proposed that it
    should be at the discretion of the individual cathedral to decide how to
    address this question.
  - Some respondees queried the recommendation in the draft report that the
    non-executive members of Chapter need not all be communicant Anglicans.
    We suggest that the Cathedrals Measure should be amended to stipulate that
    the majority of the non-executive members of Chapter should be
    communicant Anglicans or from Churches in communion with the Church of
    England, although other denominations could make up a minority of the nonexecutive members.

- Various respondees suggested that the Chapter will need to meet more than four times each year. We accept this and have amended our recommendation accordingly.
- NCI engagement with cathedrals, while helpful, is highly fragmented and lacks co-ordination and oversight. We recommend that the new Third Church Estates Commissioner should convene and chair a Cathedrals Support Group to co-ordinate and oversee the activities of the NCIs in relation to cathedrals.
- We recommend in the final report that guidance on whistleblowing should be drafted for adoption by cathedrals as this was raised by a number of respondees.

#### **Insolvency Arrangements: Main points raised**

- 31. The Working Group received a helpful submission from Pelham Allen, a restructuring specialist, which raised questions about the application of the statutory insolvency regime for cathedrals. We are advised that it is not clear how far insolvency applies to cathedrals. There has been only one case where the issue has been decided (Bradford) and then only in the county court. In that case, the court decided that a CVA (Company Voluntary Agreement) could be entered into in relation to the cathedral's debts. We do not know whether another court would take the same view.
- 32. If the provisions of insolvency legislation which enable an insolvent corporation's debts to be dealt with in an orderly way is not available, the insolvency of a cathedral would be exceptionally difficult to manage. This situation is clearly unacceptable.

#### **Insolvency Arrangements: CWG response**

- 33. We are therefore recommending in the final report that legislation should clarify that the CVA regime applies to cathedrals. The legislation should make clear that winding-up provisions should **not** allow the sale to meet a cathedral's debts of buildings and land.
- 34. The Church Commissioners have asked us to re-emphasise that they do not (and cannot) 'underwrite' cathedrals and they cannot be considered in any way as a backstop if and when a cathedral gets into difficulties. In one case, they have exercised their power of investment to make a loan at commercial rates to cover a cathedral's cashflow situation, but there can be no expectation by cathedrals that they will do so.

#### The Vice-Chair: Main points raised

- 35. The majority of the responses to the consultation requested more information about this proposed role which was outlined in the draft CWG report. Particular concerns included the following:
  - How the Vice Chair would relate to the bishop and members of Chapter and in particular the impact that this role would have on the respective powers of bishop and dean within the cathedral
  - Query whether the Vice Chair could be truly 'independent' given his/her fiduciary responsibilities as a member of Chapter in common with other members of Chapter under the requirements of charity law
  - Query whether the Vice Chair actually needed to be 'lay'

#### RESPONSE TO CONSULTATION FEEDBACK

• Request for a clearer role description for the Vice Chair

#### The Vice Chair: CWG response

- 36. The CWG have considered these points and have incorporated the following points into the final report:
  - The Vice Chair should be the appointment of the bishop
  - The Vice Chair role may be lay or ordained but **must** have no role within the day-to-day management of the cathedral.
  - As a member of the Chapter, the Vice Chair would be required to act at all
    times in the interests of the cathedral in line with the usual requirements of
    trustees and must not act under the direction of the bishop (or of anyone
    else). But, subject to that overriding duty, the Vice Chair would form a
    diocesan link with the Chapter and would keep the bishop informed about the
    work of the Chapter.
  - The Vice Chair would chair meetings of Chapter in the absence of the dean. (Duties in relation to services and other matters of a spiritual nature would be carried out by a residentiary canon in the dean's absence – the sub dean where such an office exists. Functions of an administrative nature would be carried out by the COO.)
  - A model role description for the Vice Chair should be prepared to be used for recruitment and appointment and on-going management purposes (and we have incorporated some suggestions in to our Report).
- 37. We hope that these proposals will provide some clarity and definition to the role, which we see as absolutely key to the functioning of the new model of Chapter.

#### Residentiary canons: Main Points Raised

- 38. The constituency most critical of the report was that of the residentiary canons. Most of these respondents did not object to the overall proposals, but they did object very strongly to the proposals which concerned the role, status and accountability of residentiary canons.
- 39. Their objections may be summarised as follows:
  - They were not consulted on the proposals prior to the publication of the draft report
  - As office holders it is not appropriate to refer to them as being 'line-managed' since line management is a feature of an employment relationship.
  - Ministerial Development Review (MDR) is not equivalent to 'appraisal' and the two should not be conflated
  - The reference to seeking to position residentiary canon roles as 'developmental posts' which people move in and out of earlier in their ministry was seen as a downgrading of the status and importance of these roles.

#### **Residentiary Canons: CWG response**

40. The CWG has given careful consideration to all of these points. We accept the accusation of lack of consultation. Our thinking on this issue only coalesced following other consultations and we did not have sufficient time to consult separately prior to issuing the draft report for consultation. Since the draft report was published, the CWG has held further discussions with residentiary canons.

- 41. The main point behind many of our recommendations about residentiary canons remains valid. The current Cathedrals Measure makes only passing reference to residentiary canons and gives no indication of to whom they are responsible and what their role and duties should be. Cathedrals are responsible for major financial investments and liabilities and they need to be able to deploy clergy, staff and financial resources in as efficient and as effective a way as possible, in line with best practice in the charitable sector.
- 42. Whilst we accept that as office-holders residentiary canons cannot be 'line managed', there needs to be a mechanism by which those residentiary canons with operational duties in the cathedral are accountable to the Chapter. The CWG continues to believe that the most obvious and correct mechanism is for those residentiary canons to be accountable to the Chapter via the dean for their cathedral duties.
- 43. We accept that the draft Report was confusing in terms of its treatment of MDR. We have attempted to address this distinction in the revision of our Report.
- 44. We did not intend to suggest that residentiary canons should **only** be appointed as developmental posts and can see how our initial draft was unhelpful in this respect. We accept that there is huge merit in some residentiary canons holding office at a very different point in their ministry and have incorporated this point in to the revised Report, while still recognising the importance of appointing some residentiary canons at an earlier stage of their ministerial development.
- 45. We recommend that the Cathedrals Measure should be amended to incorporate the role, status and duties of residentiary canons and to clarify their operational accountability to the Chapter via the dean.

#### Parish Church Cathedrals: Main points raised

46. The CWG received many submissions from parish church cathedrals. These submissions raised questions about the specific legal and ecclesiological framework in which these cathedrals operate. In particular, concerns were raised about how the proposed changes to the Cathedrals Measure would relate to those parish church cathedrals who have chosen to make provision in their constitutions for some congregational representation on their Chapter. These arrangements would be impacted considerably by the proposals made in the CWG report.

#### Parish Church Cathedrals: CWG response

- 47. We accept that the position of parish church cathedrals requires further consideration and that more work must be done to ensure a coherent approach to how parish church cathedrals will be treated under a revised Measure.
- 48. The most acute question was how those parish church cathedrals who wished to do so could retain their congregational representation under the new model that we propose for Chapter. We agree that parish church cathedrals should retain the ability to elect some members of the congregation to Chapter, given their particular requirements.
- 49. However, it is vital that mechanisms are put in place to ensure that those members of Chapter elected in this way are: (a) eligible and suitable to act as trustees and members of Chapter, and (b) have the required skill sets, so that

#### **RESPONSE TO CONSULTATION FEEDBACK**

- each Chapter can ensure it has the balance of core skills it requires to carry out its responsibilities as a trustee body.
- 50. We recognise that some parish church cathedrals value their status and want to retain it, while others would like to be able to 'opt out' and come wholly under the statutory provisions that apply to non-parish church cathedrals. We therefore propose a flexible approach in our final Report.

#### **Cathedral Councils and College of Canons: Main Points Raised**

- 51. The consultation revealed mixed views about the role and utility of Cathedral Councils. Some members of Councils felt disenfranchised by the proposals. Others admitted to being confused about the role they were expected to play and expressed frustration at their lack of powers and accountability.
- 52. Some respondees argued that the Chair of the Council is the only effective counterweight to the power of the dean and that lay members of the Council offer professional skills and wider-world insights which the ordained members of Chapters cannot provide. Others felt that their roles and responsibilities were very confusing and that moving to a stakeholder arrangement might help give some clarity. Still others felt that a Council constituted purely for stakeholder engagement would not attract people of sufficient calibre and urged us to abolish the Council entirely.
- 53. There was also some criticism that insufficient attention was paid to the College of Canons.

#### Cathedral Councils and College of Canons: CWG Response

- 54. We feel that the current arrangements for Councils under the Measure are a recipe for confusion of accountability and do not assist with good governance. As a result of feedback from the consultation, the CWG now takes the view that the confused situation revealed by the consultation responses constitutes a clear case for the abolition of Councils in their entirety, leaving the way clear for cathedrals to find their own means of stakeholder engagement as best befits their situation.
- 55. We hope that the governance arrangements we are proposing will constitute a more effective set of checks and balances than Councils have provided under the current Measure, and we envisage that some Council chairs/members may migrate across to the new-style Chapter under these new arrangements.
- 56. The CWG recognise the importance of the College of Canons in the life of a cathedral, and their significance as part of the bishop's 'familia'. We remain of the view that they should not form part of the body corporate of a cathedral, and that it should be up to the Chapter in consultation with the bishop to determine the best way to incorporate their contribution in to the life of the cathedral.

#### **Finance Proposals: Main Points Raised**

57. There were many objections to the proposal that the NCIs should put together a list of approved Audit firms. Respondees thought that this would mean having a list of expensive London-based firms imposed on them and felt that this would be unhelpful and potentially in breach of competition law.

#### **RESPONSE TO CONSULTATION FEEDBACK**

- 58. A further concern raised was that cathedrals might struggle to afford to employ a fully-qualified CFO. Some smaller cathedrals took the view that they did not need to employ a fully-qualified senior accountant and that their financial management requirements could be fulfilled by a less qualified (and less expensive) member of staff.
- 59. There was considerable objection from cathedrals to submitting their quarterly accounts to the NCIs. These objections partly came from concerns that it would be too time-consuming to prepare such accounts on a quarterly basis. We also note an element of suspicion regarding what the national church would 'do' with this information.

#### **Finance Proposals: CWG Response**

- 60. We feel that these objections to the list of approved audit firms were based on a misunderstanding of our original proposals. It was never our intention to limit such a list to London-based as opposed to regional firms. Rather, we were recommending that NCI staff would put together a panel which was broad and included local and regional firms of a range of sizes. We continue to advocate this.
- 61. We do not expect every cathedral to employ a CFO with the highest level of accountancy qualification. Rather, we simply recommend that the CFO should be appropriately qualified for the needs of the cathedral concerned. Cathedrals should be left flexibility with regards to the type and extent of the qualifications required, thus allowing lower cost options if appropriate.
- 62. After discussion we take the view that cathedrals should be required to supply NCIs with their accounts at year end only. This information is required for benchmarking and planning purposes and to enable the NCIs to assist with mitigating any potential difficulties.

#### **Buildings: Main Points Raised**

- 63. In general, these proposals were welcomed. The only concern raised was regarding the proposal that all funds should be in place prior to the start of a building project. Many respondees pointed out that this is unrealistic, but that it is entirely feasible to plan a building project in stages with the option of ceasing after every stage should further funds not be made available.
- 64. There was considerable support for the proposal to enter a discussion with Government on the potential creation of a National Cathedrals Fund.

#### **Buildings: CWG response**

- 65. In response to the points raised, we have amended the recommendation to say that funds should be in place for **each phase** of a project, not for the entire project at the start.
- 66. We continue to think that the NCIs should open a dialogue with national government about a possible National Cathedrals Fund.

#### Safeguarding: Main points raised

67. This was an uncontentious section of the report and the proposals were largely welcomed. The AEC and many other cathedrals stated that they were already taking forward the recommendations set out in the draft report.

#### Safeguarding: CWG response

- 68. The on-going hearings of the Independent Inquiry into Institutional Child Sexual Abuse (IICSA) have already raised questions about the relation of the cathedral to the diocese. We are aware that the proposals in this section are of the utmost importance, and they were widely welcomed and supported by respondents. We continue to advocate them very strongly.
- 69. We have agreed some minor areas of clarification. In our final report we emphasise the need for dioceses and cathedrals to ensure that there is sufficient resourcing in place to manage safeguarding matters within the cathedral. We will make it clear that the bishop and dean should both be held clearly accountable for safeguarding, and the nature of their respective responsibilities under this arrangement.
- 70. There was some confusion expressed by respondees about how the Church's safeguarding regulatory regime overlaps with other regulatory regimes in this area, particularly for cathedral and choir schools. We suggest that the NST ensure that guidance and advice is in place to clarify this.
- 71. Cathedrals and dioceses might benefit from more guidance on how their day-today joint working arrangements might work in practice. We will be asking the National Safeguarding Team to ensure that this is addressed in training and guidance materials.

#### **Charity Commission regulation and alternative options**

- 72. There was general support amongst the respondees to the consultation for the CWG's proposal that cathedrals should come under the regulation of the Charity Commission, although a few raised questions about the regulation of cathedrals by a secular body and the capacity of the Charity Commission to be an effective regulator.
- 73. However, despite this general support from the cathedral community, the Charity Commission itself has received this proposal with considerable caution and has requested further detailed dialogue with the NCIs on the potential implications of such a scenario.
- 74. We continue to see registration with the Charity Commission as the preferred outcome for cathedrals. We accept that in practice the Charity Commission may not be an active regulator, and that cathedrals themselves will need to lead on reforming their own governance arrangements and practices, in partnership with their dioceses and the NCIs. We do, however, believe that registration with the Charity Commission will be an important **symbolic** step for cathedrals, aligning them with the rest of the Church of England, giving the message that they must operate in line with charity sector best practice and also giving assurance to funders, worshippers and the wider community.
- 75. In the Report we therefore set out our initial thinking on how the NCIs might advocate for cathedrals to come under this regime.
- 76. We believe that whatever the outcome of the dialogue with the Charity Commission, the NCIs should proceed with implementing the remainder of their proposals with regards to legislation, finance, HR matters, safeguarding etc. They may also need to explore alternative options for oversight of the sector. These could include the following:

- Regulation by the Church Commissioners;
- Regulation by another separate body set up for the purpose; or
- Establishing a department within the NCIs specifically focused on the oversight of cathedrals
- 77. We see these options as less optimal than that of Charity Commission regulation. Each of them would require considerable further thinking should Charity Commission regulation not materialise.

#### **Conclusions**

- 78. We would like to convey how impressed we were by the huge commitment and enthusiasm for the flourishing of cathedrals evidenced by all those who responded, whether individually or corporately and from whichever quarter they responded and from all perspectives. We found this a positive and encouraging hope for the long-term health and sustainability of cathedrals.
- 79. The passion and (in some cases controversy) that the report excited seems to us to have helped crystallise and surface some long-standing and deeply-held concerns and issues that have long pre-dated our own report and even those which came before it. We hope that in stimulating debate and even being the source of some ire our report has performed a service to cathedrals and the wider church in helping them face up to and work to resolve some of these
- 80. I would like to set down here my immense gratitude on behalf of myself and the Working Group to all those who responded during the relatively short period which for unavoidable reasons we had to give to the consultation exercise.

Rt Revd Adrian Newman, Bishop of Stepney Chair, Cathedrals Working group May 2018

#### **RESPONSE TO CONSULTATION FEEDBACK**

### LIST OF ORGANISATIONS AND INDIVIDUALS WHO RESPONDED ANNEX A

#### List of organisations and individuals that responded to Online Questionnaire

Where blanks are left, affiliation is not stated.

Group/Individual	Affiliation
Chair of Fabric Advisory Committee	Liverpool Cathedral
Cathedral volunteers	Lichfield Cathedral
Cathedral Safeguarding Officer	St Albans Cathedral
Local resident	
Cathedral Clergy (not mentioned above)	Blackburn Cathedral
Lord Lieutenant	
Member of College of Canons	Guildford Cathedral
Member of Cathedral Council	Ely Cathedral
Parishoner	
Chair of Cathedral Council	Chelmsford Cathedral
Member of Chapter	Chelmsford Cathedral
Member of Chapter	Chester Cathedral
Ex Secretary of the Cathedrals Fabric Commission. Member of WW1	
Cathedrals Fabric Committee Expert Panel. Writer & presenter on cathedrals	
Cathedral volunteers	Manchester Cathedral
Provincial Canon	
Cathedral Head of Finance	Rochester Cathedral
Member of Chapter	St Edmundsbury Cathedral
·	
Chair of Cathedral Council	Salisbury Cathedral
Local resident	
Member of College of Canons	Canterbury Cathedral
Member of Cathedral Council	Bristol Cathedral
Friends of Salisbury Cathedral	Salisbury Cathedral
High Sherriff	
High Sherriff	
Cathedral Volunteer	
Cathedral Lay Staff	Lincoln Cathedral
Cathedral corporate	Gloucester Cathedral
Trustee of Canterbury Cathedral Trust Fund	Canterbury Cathedral
Member of College of Canons	Guildford Cathedral
Cathedral Lay Staff	York Minster
Chair of Cathedral Council	Guildford Cathedral
Cathedral Clergy (not mentioned above)	
Member of Chapter	Coventry Cathedral
Administrators	Rochester Cathedral

Group/Individual	
	Affiliation
Chair of Cathedral Council in personal capacity	
Cathedral volunteers	Hereford Cathedral
Cathedral Clergy (not mentioned above)	St Paul's Cathedral, London
Local resident	
Parish Church	
Parish Priest	
Local resident	
Local resident	
Anglican with a huge interest in Cathedrals	
Local resident	
Cathedral Lay Staff	Winchester Cathedral
Lay Co-Chair	
Member of Public	
Member of College of Canons	Guildford Cathedral
Member of public	
Local resident	
Local resident	
Local resident	
Cathedral Lay Staff	Peterborough Cathedral
Member of Chapter	Bradford Cathedral
former cathedral employee, churchgoer, fundraiser for churches and cathedrals	
Other	
Museum at Durham Cathedral	Durham Cathedral
Cathedral Lay Staff	Bradford Cathedral
Local resident	
Member of College of Canons	Birmingham Cathedral
Cathedral Church of my Ordinations	
Cathedral volunteers	Wells Cathedral
Residentiary Canons	
Local Council senior officer	
Private individual	
Residentiary Canons	Ely Cathedral
Member of Fabric Advisory Committee	Birmingham Cathedral
Member of Fabric Advisory Committee	Coventry Cathedral
Local resident	
Cathedral congregation	Durham Cathedral
Honorary Canon	
Cathedral volunteers	Chichester Cathedral
Diocesan Secretary	
Residentiary Canons	Wells Cathedral
Rural Dean	
Residentiary Canons	Wells Cathedral
General Synod Member - House of Clergy	

One way the Park hand	Affiliant
Group/Individual	Affiliation
Cathedral Lay Staff	Ely Cathedral
Chair of Fabric Advisory Committee	Birmingham Cathedral
Cathedral volunteers	Winchester Cathedral
Cathedral Head of Finance	Winchester Cathedral
Local Authority	
Associate Minister	Coventry Cathedral
Local resident	
Diocesan Bishop	
Member of College of Canons	Wells Cathedral
The Chapter (collective)	Southwark Cathedral
Member of Cathedral Council	Truro Cathedral
Cathedrals Architects Association	Winchester Cathedral
Central Government Departments	
Congregation	
Cathedral Head of Finance	Derby Cathedral
Member of College of Canons	Coventry Cathedral
Chair of Finance Committee	
St Oswald's Bradford and All Saints Horton	
Dean Emeritus	
Cathedral Lay Staff	Guildford Cathedral
Lord Lieutenant	Hereford Cathedral
Chair of Cathedral Council	Ripon Cathedral
Cathedral volunteers	Guildford Cathedral
Cathedral volunteers	Guildford Cathedral
Cathedral volunteers	Guildford Cathedral
Cathedral volunteers	Guildford Cathedral
Local resident	
staff	Guildford Cathedral
Local Authority	
Member of Cathedral Council	Liverpool Cathedral
Themsel of Galileana Galileii	ziverpeer Gamearar
Member of Fabric Advisory Committee	Gloucester Cathedral
Cathedral volunteers	St Albans Cathedral
Local resident	ot / libario odinodiai
Member of Chapter	Ely Cathedral
Local resident	Liy Gatilodidi
Member of College of Canons	Bristol Cathedral
Deans	Ely Cathedral
Personal Response	Liy Catilediai
Assistant Organists Conference	Guildford Cathedral
	Guilulolu Galileulai
Suffragen Bishop	Loissotor Cathadral
Administrators  Cathodral congression	Leicester Cathedral
Cathedral congregation	Manchester Cathedral

#### RESPONSE TO CONSULTATION FEEDBACK

#### LIST OF ORGANISATIONS AND INDIVIDUALS WHO RESPONDED

Group/Individual	Affiliation
Member of Cathedral Council	Bradford Cathedral
Member of Cathedral Council	Bradford Cathedral
Residentiary Canons	Winchester Cathedral
Residentiary Canons	Gloucester Cathedral
Member of Chapter	Manchester Cathedral
Member of Cathedral Council	Truro Cathedral
Chair of Cathedral Council	Carlisle Cathedral
Cathedral Lay Staff	Lincoln Cathedral
Cathedral congregation	Exeter Cathedral
Member of Chapter	Manchester Cathedral
Cathedral Lay Staff	Rather not say
Member of College of Canons	York Minster
Cathedral volunteers	Birmingham Cathedral
Local Resident	<u> </u>
Cathedral congregation	Portsmouth Cathedral
Parish priest	
Member of Cathedral Council	Durham Cathedral
Member of Chapter	Blackburn Cathedral
Member of College of Canons	Canterbury Cathedral
The Chapter (collective)	Bradford Cathedral
The Chapter (collective)	Exeter Cathedral
Member of Cathedral Council	Southwell Minster
Cathedral corporate	Worcester Cathedral
Cathedral corporate	Sheffield Cathedral
Cathedral corporate	Lincoln Cathedral
Member of College of Canons	Salisbury Cathedral
Residentiary Canons	Guildford Cathedral
Local resident	Guildiold Gatilediai
Member of Chapter	Winchester Cathedral
Chair of Cathedral Council	Coventry Cathedral
Lord Lieutenant	Coverity Cathedian
Member of Cathedral Council	Salisbury Cathedral
Local resident	Salisbury Cathedral
	Rochester Cathedral
Residentiary Canons Former chair of Cathedral Council	Lichfield Cathedral
Trustee of Canterbury Cathedral Trust	Canterbury Cathedral
Cathedral corporate	Leicester Cathedral
Cathedral corporate	Exeter Cathedral
Former Cathedral Administrator and Deputy Lieutenant	
Local resident	
Cathedral Safeguarding Adviser	
cathedral volunteer	
Cathedral congregation	Guildford Cathedral
High Sherriff	

Group/Individual	Affiliation
Deans	Derby Cathedral
Residentiary Canons	Salisbury Cathedral
Chair of Cathedral Council	Newcastle Cathedral
Individual response from Residentiary canon	
The Chapter (collective)	Newcastle Cathedral
Deans	Truro Cathedral
The Chapter (collective)	Liverpool Cathedral
Member of Chapter	Southwell Minster
Residentiary Canons	York Minster
Dean on behalf of Chapter	Hereford Cathedral
Administrators	Hereford Cathedral
Cathedrals Architects Association	Cathedrals Architects Association
Deans	Southwell Minster
Member of Cathedral Council	Guildford Cathedral
Chair of Cathedral Council	Hereford Cathedral
Residentiary Canons	Lichfield Cathedral
High Sherriff	
Individual Cathedral Worshipper	
Administrators	Guildford Cathedral
The Chapter (collective)	Derby Cathedral
Cathedral Lay Staff	Guildford Cathedral
Cathedral corporate (if you are responding on behalf of the entire cathedral)	Chester Cathedral
The Chapter (collective)	Derby Cathedral
Regular Day Chaplain at two cathedrals	St Albans Cathedral
Lord Lieutenant	
The Chapter (collective)	Ely Cathedral
Cathedral Lay Staff	York Minster
Chair of Cathedral Council	Ely Cathedral
High Sheriff	
Cathedrals Architects Association	Newcastle Cathedral
Cathedral corporate (	Wells Cathedral
Deans	Blackburn Cathedral
Cathedral corporate	Lincoln Cathedral
Deans	Guildford Cathedral
Cathedral congregation	St Albans Cathedral
Cathedral Head of Finance	Salisbury Cathedral
Member of College of Canons	Bristol Cathedral
Residentiary Canons	Gloucester Cathedral
High Sherriff	
Member of Chapter	
Cathedral corporate	Salisbury Cathedral
Cathedral Clergy (not mentioned above)	Canterbury Cathedral

Group/Individual	Affiliation
Diocesan Bishop	
Diocesan Bishop	
Member of Council	21 (". 11 2 11 1 1
Residentiary Canons	Sheffield Cathedral
Cathedral staff	Canterbury Cathedral
Cathedral Grant Funder	
Friends of Gloucester Cathedral	Gloucester Cathedral
Chair of Cathedral Council	Liverpool Cathedral
Member of Cathedral congregation	
Cathedral congregation	
The Chapter (collective)	Norwich Cathedral
Cathedral Lay Staff	Salisbury Cathedral
Cathedral congregation	St Albans Cathedral
Cathedral corporate	Lichfield Cathedral
Cathedral Head of Finance	
Cathedral congregation	Rather not say
clergy	
Member of Fabric Advisory Committee	Southwell Minster
Chair of Cathedral Council	St Edmundsbury Cathedral
Administrators	Manchester Cathedral
Cathedral corporate	St Albans Cathedral
Cathedral congregation	Derby Cathedral
Chair of Cathedral Council	St Albans Cathedral
Residentiary Canons	Manchester Cathedral
Member of Chapter	Lichfield Cathedral
ArchBishops' Council Finance Committee	
The Chapter (collective)	Chelmsford Cathedral
The Chapter (collective)	Gloucester Cathedral
Deans	Newcastle Cathedral
Cathedral Head of Finance	Coventry Cathedral
Honary Assistant Clergy (ie Retired)	Guildford Cathedral
Member of Cathedral staff	
Member of Cathedral Council	Worcester Cathedral
Diocesan Bishop	
Cathedral Lay Staff	York Minster
The Chapter (collective)	Durham Cathedral
Cathedral corporate	St Paul's Cathedral, London
Cathedral corporate	Bristol Cathedral
Administrators	Coventry Cathedral
Administrators	Coventry Cathedral
Deans	, , , , , , , , , , , , , , , , , , , ,
Residentiary Canons	Coventry Cathedral
Chair of Fabric Advisory Committee	Gloucester Cathedral
The Chapter (collective)	St Edmundsbury Cathedral
The chapter (concentre)	3. Editidiasbury Cathodiai

Group/Individual	Affiliation
Cathedral congregation	Gloucester Cathedral
Member of College of Canons	Bradford Cathedral
Cathedral Lay Staff	Guildford Cathedral
A Cathedral Worshipper	
The Chapter (collective)	Carlisle Cathedral
The Chapter (collective)	Portsmouth Cathedral
Cathedral corporate	Birmingham Cathedral
The Chapter (collective)	York Minster
Chair of Cathedral Council	Gloucester Cathedral
Deans	Birmingham Cathedral
Community Committee	Guildford Cathedral
The Chapter (collective)	Rochester Cathedral
Cathedral Head of Finance	York Minster
Lay Canon	
Cathedral Grant Funder	

#### List of organisations and individuals that responded by letter

Where blanks are left, cathedral affiliation is not stated.

Group/Individual	Affiliation
Bishop of Southwark	Southwark Cathedral
Andrew J Coombe, HM Lord Lieutenant, South Yorkshire	Lord Lieutenant
Rt Revd Martyn Percy, Dean of Christchurch College, Oxford	Christchurch Cathedral, Oxford
Paul Smith, BSC, Chairman, Choir Schools Association	Choir Schools Association
Alfred CJ Hagerman	St Albans Cathedral
Sir Algernon Heber-Percy KCVO, Lord Lieutenant, Shropshire	Lord Lieutenant
Very Revd Andrew Nunn, Dean	Southwark Cathedral
The Rev'd Canon Christopher Pullin, Chancellor, The Rev'd Canon Andrew Piper, Precentor	Hereford Cathedral
Rt Revd Tim Dakin, Bishop of Winchester and Staff Team	Winchester Cathedral and Diocese
Lord Lieutenant of Suffolk, Lady Clare Euston	St Edmundsbury Cathedral
Rt Revd Graham James, Bishop of Norwich	Norwich Cathedral
Lord Charles Cecil of Hatfield	St Albans Cathedral
Canon Jeremy Dussek, Canon Precentor	Chester Cathedral
Conrad Donaldson MA FIA, Chair of Friends of Exeter Cathedral	Exeter Cathedral
Tom Ashley, Senior Cathedrals Officer and, Deputy Secretary to the CFCE, Cathedrals Fabric Commission for England	CFCE, Cathedrals Fabric Commission for England
Richard Lewis Dean Emeritus of Wells; Melvyn Matthews Chancellor Emeritus of Wells; Patrick Woodhouse Precentor Emeritus of Wells;	
Dick Acworth Archdeacon Emeritus of Wells	Wells Cathedral
Sir Philip Mawer, Chair, All Churches Trust	All Churches Trust
Colin Quine and Jean Reed, Grubb Institute	Grubb Institute

Group/Individual	Affiliation
•	Aimation
Canon Professor Peter Shaw CB PhD DCL(Hon), Chair Guildford Cathedral Council	Guildford Cathedral
Mrs Jean Ritchie QC, Chairman Winchester Cathedral Council	Winchester Cathedral
Jeremy Bromfield	Member of Congregation, St Albans Cathedral
Paul Lewis, Pastoral & Closed Churches Secretary and Bishoprics & Cathedrals Secretary, Church Commissioners	Church Commissioners
Canon Muriel Robinson, OBE DL, Lay Chair of Lincoln Cathedral Community Association	Lincoln Cathedral
Lincoln Cathedral Chapter	Lincoln Cathedral
Michael Hampel, Chair, Precentors Conference	St Paul's Cathedral
Lay Canon Professor Brian Thorne, Acting Representative, College of Canons, Norwich Cathedral	Norwich Cathedral
Canon Paul Rattigan, Residentiary Canon	Liverpool Cathedral
Peter Bounds, Chair, Liverpool Cathedral Council	Liverpool Cathedral
The Reverend Canon Peter Holliday; His Honour Simon Tonking	Lichfield Cathedral
Dean and Chapter, Blackburn Cathedral	Blackburn Cathedral
Revd Canon Dr Lynda Barley, Canon Pastor Truro Cathedral	Truro Cathedral
Richard Ashby, Chair, Chichester Cathedral Community Committee	Chichester Cathedral
Richard Tilbrook, Prime Minister's Appointments Secretary, Cabinet Office	Cabinet Office
Sandy Nairne CBE FSA, Chair, Fabric Advisory Committee, St Paul's Cathedral	St Paul's Cathedral
Sarah King, Executive Director, Association of English Cathedrals (personal response)	Association of English Cathedrals

#### List of organisations and individuals that responded by email

Where blanks are left, cathedral affiliation is not stated.

Group/Individual	Affiliation
Dr NW James, FRHistS, Cathedral Archives, Libraries & Collections Association (CALCA)	Cathedral Archives, Libraries & Collections
, , ,	Association (CALCA)
Michael Stansfield, Hon Treasurer, and Norman James, committee member, of the Cathedral Archives, Libraries and Collections Association (CALCA)	Cathedral Archives, Libraries & Collections Association (CALCA)
Canon BJW Cave-Browne-Cave, member of Cathedral Council, Salisbury Cathedral	Salisbury Cathedral
Revd Canon Stephen Cope, Residentiary Canon	York Minster
Revd Canon Dr David Holgate, Residentiary Canon	Manchester Cathedral
Canon Sue Wallace, Precentor and Sacrist, Winchester Cathedral	Winchester Cathedral
Caroline Pitt, member of congregation and Choir Chaperone, Guildford Cathedral	Guildford Cathedral
Charles Hobson, member of congregation	Chester Cathedral
Gary Price, Clerk of the Works, Salisbury Cathedral, Secretary to the Association of Cathedral Clerks of Works	Salisbury Cathedral

#### RESPONSE TO CONSULTATION FEEDBACK

#### ANNEXE: LIST OF ORGANISATIONS AND INDIVIDUALS WHO RESPONDED

Group/Individual	Affiliation
Mrs Hazel Gowland, Member of Congregation, St Albans Cathedral	St Albans Cathedral
Caroline Peacock, High Sheriff of Durham	Durham Cathedral
James Drever	
John W Bull DSc	
Susan Darnley, Lord-Lieutenant of Herefordshire	Hereford Cathedral

#### Other Research Inputs Received

Individual	Subject
Pelham Allen, Retired Senior Partner, Ernst & Young	Insolvency Arrangements
Mike Hudson, Compass Partnership	Charity Governance

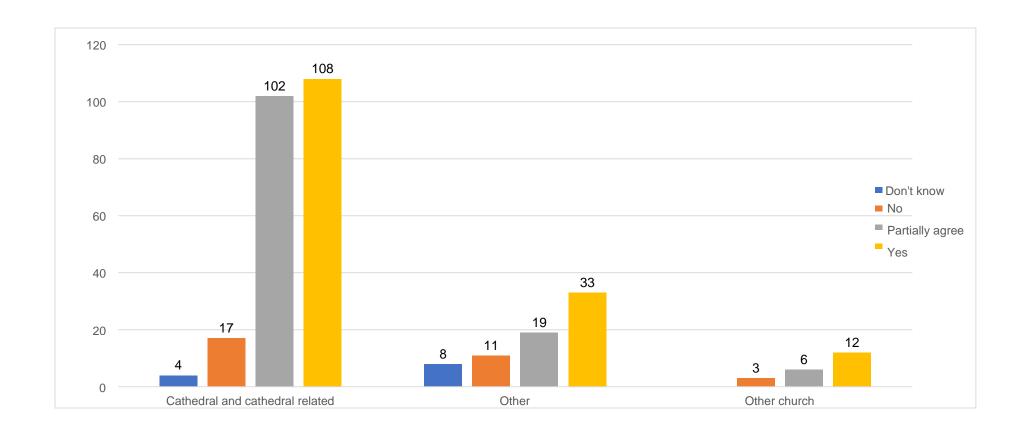
**CONFIDENTIAL** 

## ANNEX B CATHEDRALS WORKING GROUP – QUESTIONS ANALYSIS BREAKDOWN

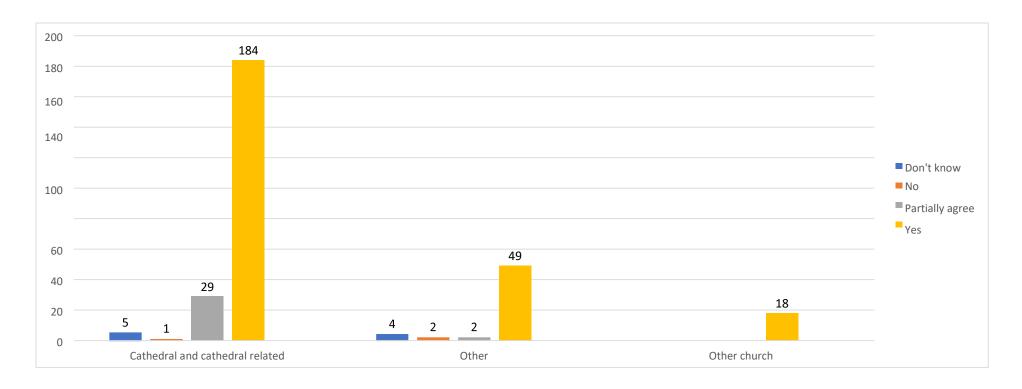
### Section 1

7 questions on the main principles of the report for everyone to complete

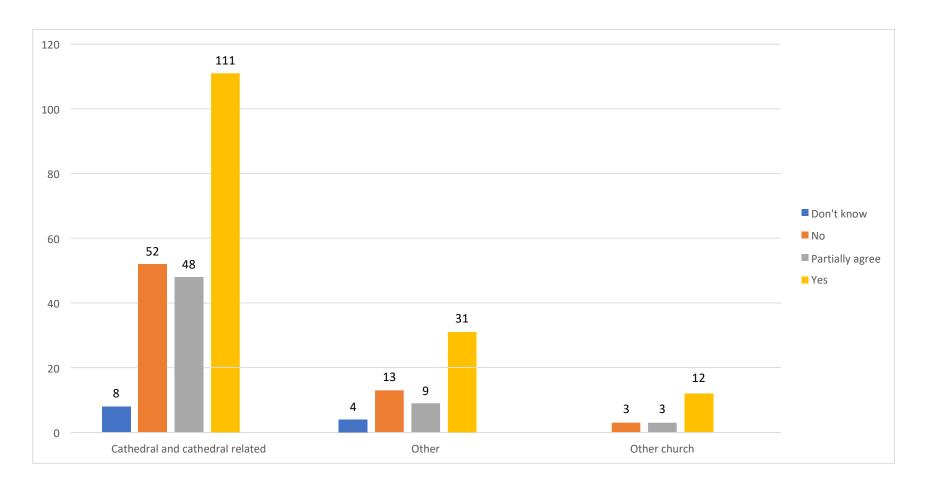
**The Governing body** of a cathedral should be a Chapter comprising the dean as chair, an independent lay vice-chair nominated by the diocesan bishop, residentiary canons, and mostly 'non- executive' members.



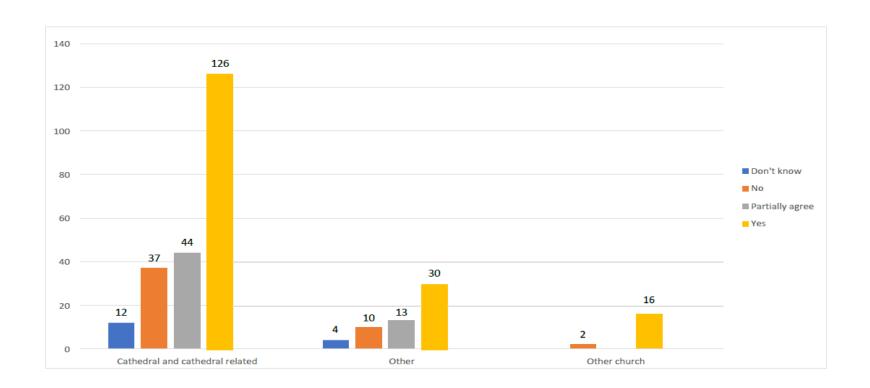
2A
The **diocesan bishop** would:
remain Visitor and retain the role of approving amendments to the constitution and statutes



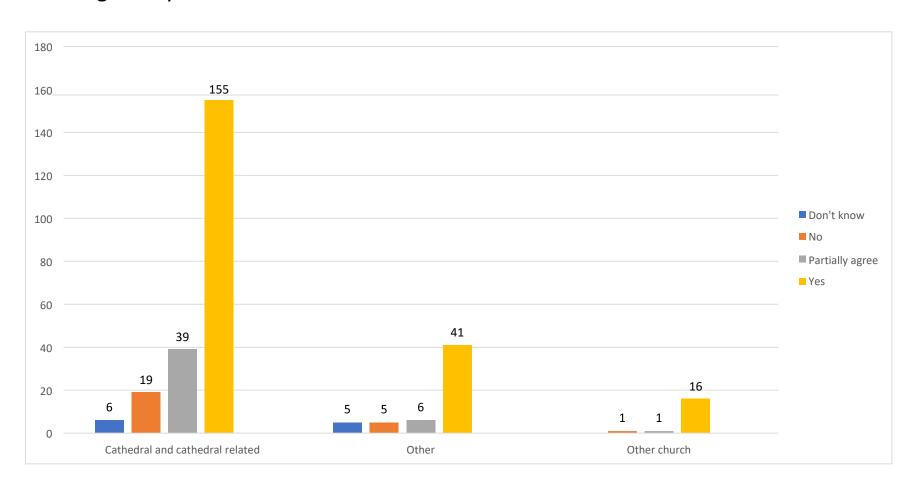
2B appoint an independent lay member to the Chapter who would also act as the vice-chair



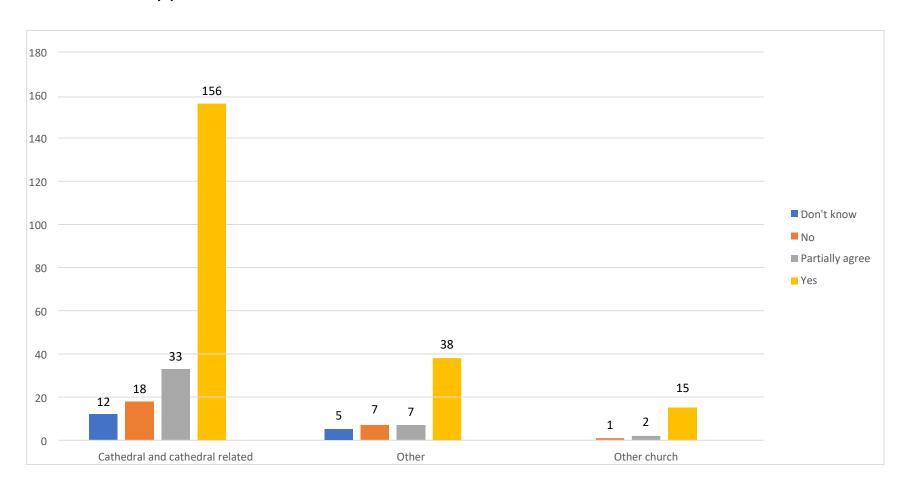
2C have the right of approval in respect of the appointment of the other non-executive members of the Chapter



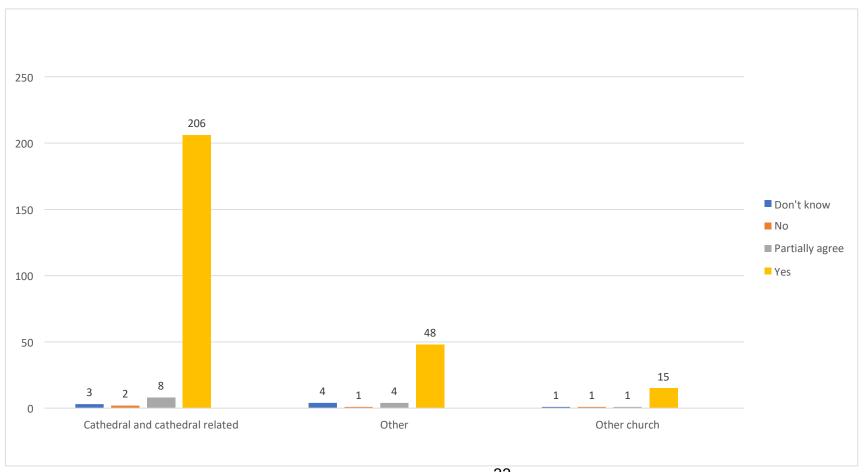
2D have the right to attend Chapter meetings and be expected to attend at least one Chapter meeting each year



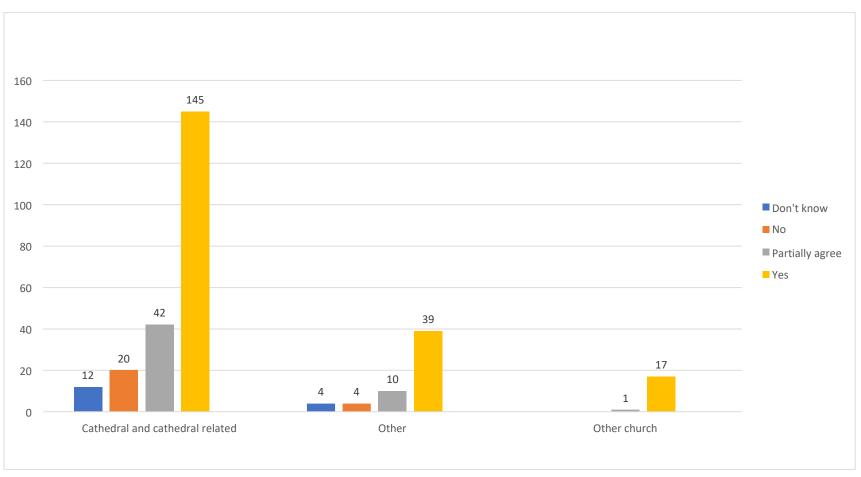
2E appoint residentiary canons (subject to the approval of the dean) except where these are Crown Appointments



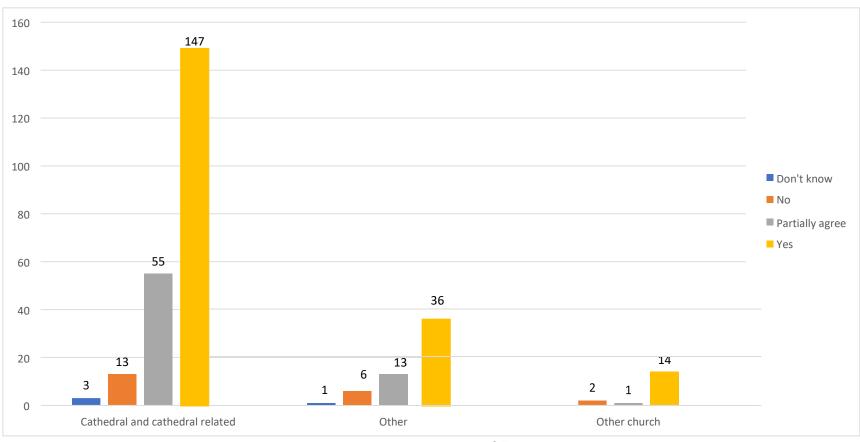
2F receive the statutory annual report and financial statements of the Chapter



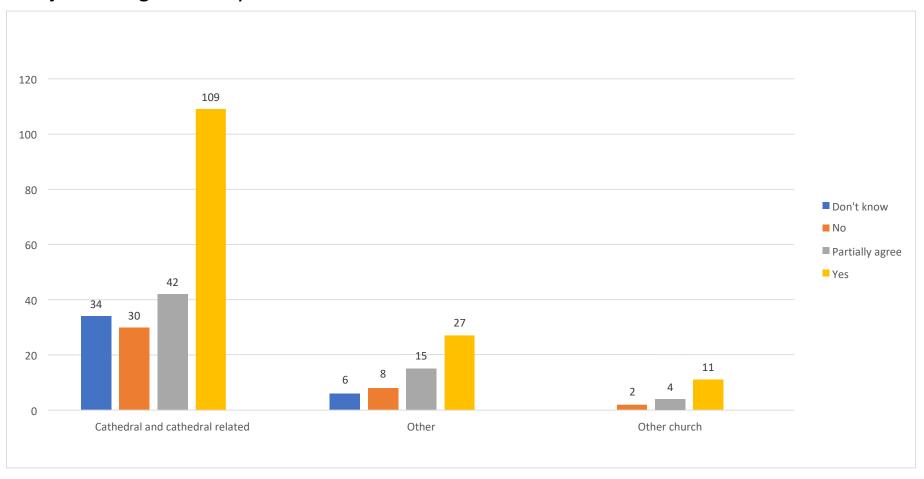
2G commission a quinquennial assurance review and receive its report



vii. In order to make a clear distinction between governance responsibility and management, the Chapter would establish a Senior Executive Team comprising the dean, the Chief Operating Officer, the Chief Financial Officer and other appropriate persons, including departmental heads, both clerical and lay. The Senior Executive Team would have an operational focus on day-to-day running of the cathedral, with Chapter having a clear oversight role.

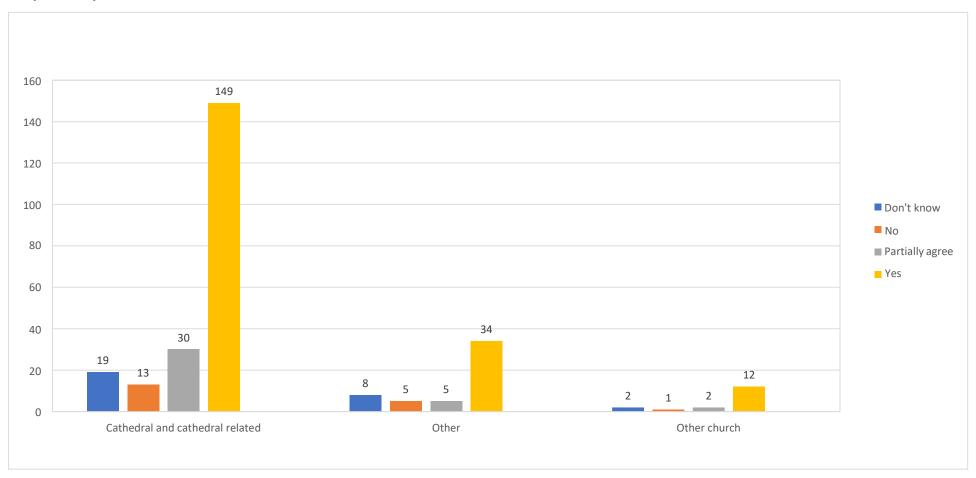


Charity Commission regulation - The Charities Act 2011 should be amended so that cathedrals become subject to the jurisdiction of the Charity Commission and cease to be subject to regulation by the Church Commissioners.

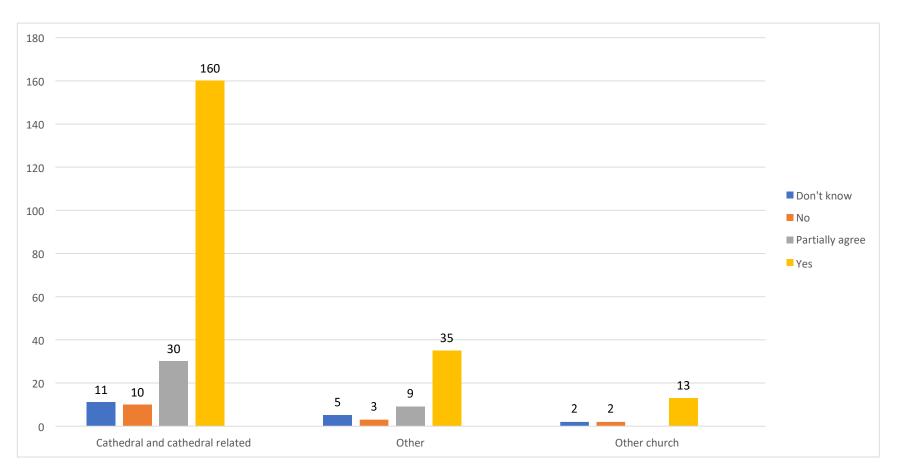


#### **Question 5**

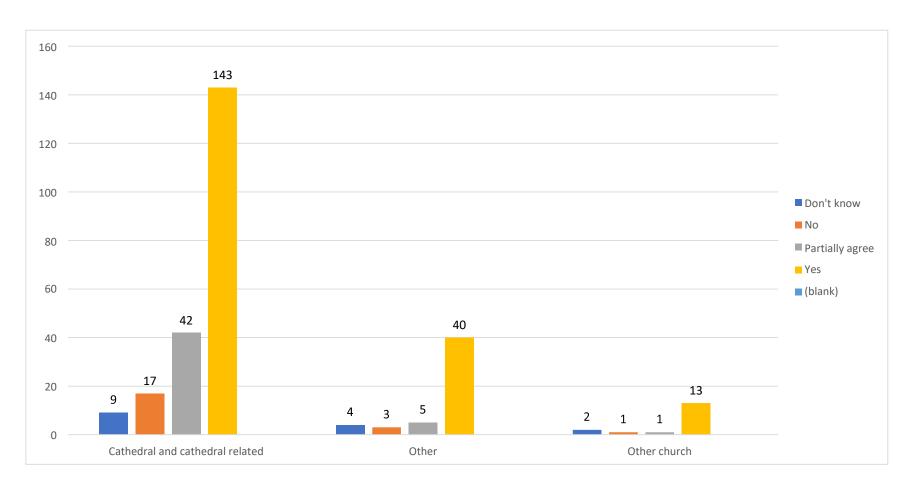
5A
The national Church, in liaison with CAFA, should produce a list of the areas which need to be covered by financial operating standards, and the controls required to be put into effect by every cathedral.



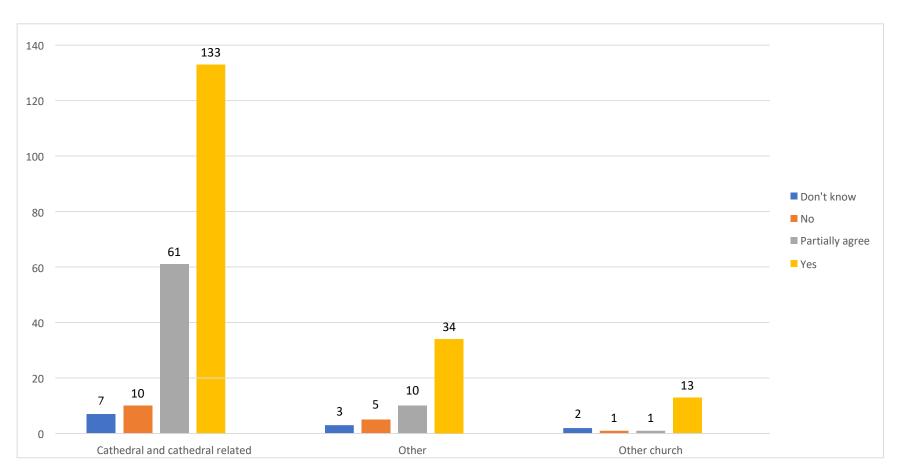
The new Chief Finance and Operations Officer of the NCIs should take forward scoping work to establish a national support services function for the cathedral sector, liaising with representatives from cathedrals, with consideration specifically being given to those services where it is inefficient and/or uneconomic for cathedrals to employ full or part time resources locally, or to maintain competence over time.



5C Consideration should also be given to the development of a model set of management accounts, including cash flow forecast, by the national Church.

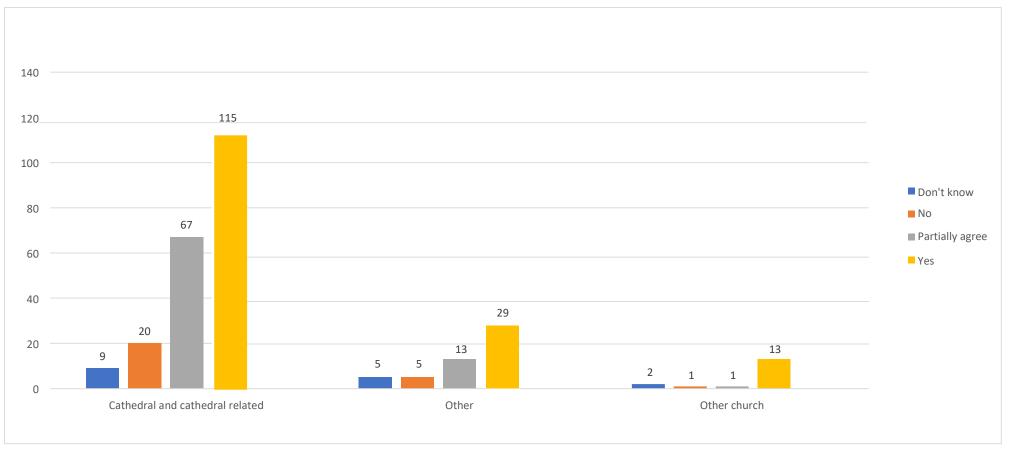


5D Rolling five-year plans should be produced and updated annually, and shared with the national Church.



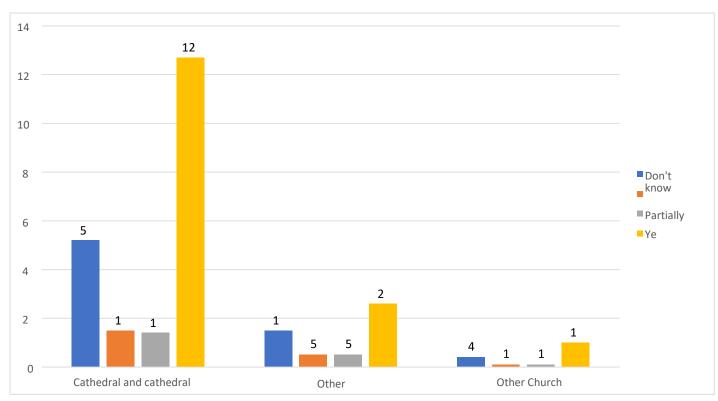
The following data should be provided by each cathedral, in addition to the statutory annual report and financial statements, to the national Church:

the results of Chapter's annual AEC Peer Review Process Self-evaluation budget and forecast cash flow for the forthcoming year rolling five-year plan, as updated annually summary management accounts at the year-end (and, ideally, at each quarter-end) highlighting variances against budget and including the reserves position at the beginning and end of the period, analysed between unrestricted, restricted and endowment funds



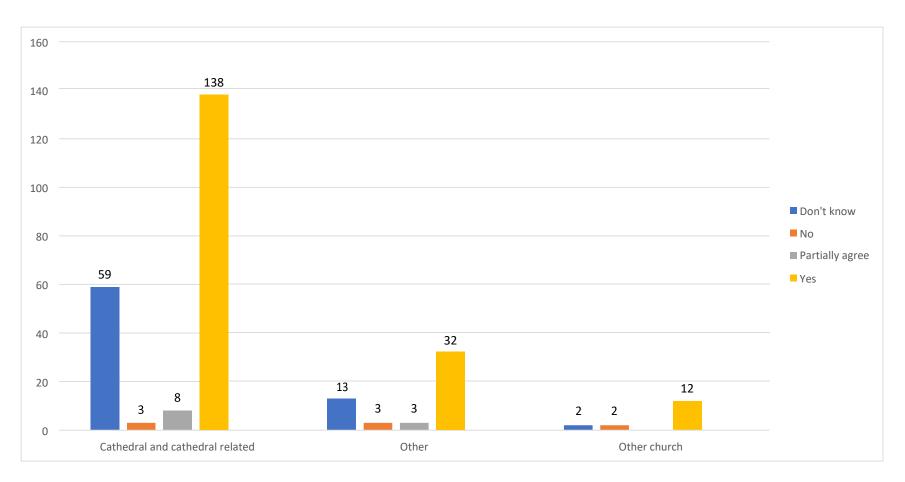
#### **Question 6**

6A
The Church Commissioners should formalise their informal approach to varying total cathedral grants each year in line with changes to Bishops' grants and Parish Mission and Ministry grants.

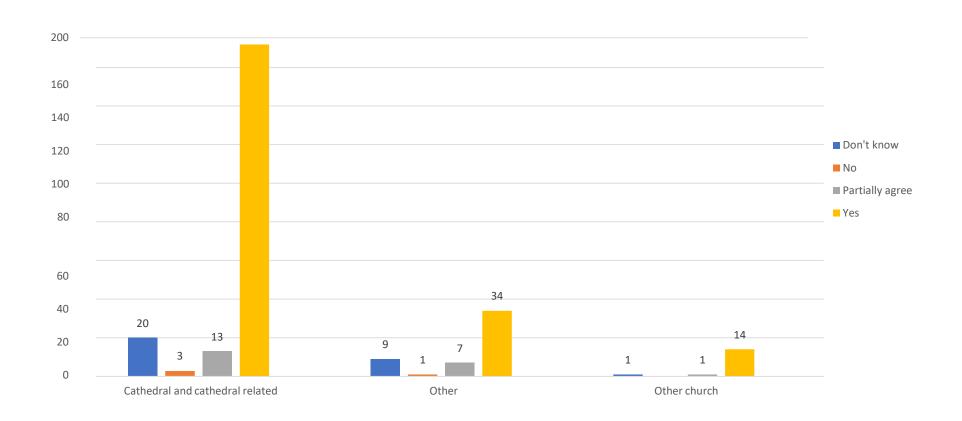


6B

The costs of chancel repair liabilities, and consequently the need for section 25 grants, should be removed from the cathedrals' funding process. Cathedrals should transfer the management and administration of their chancel repair liabilities to the Church Commissioners on the understanding that the Church Commissioners would make grants to cover 100% of the cost of these liabilities.

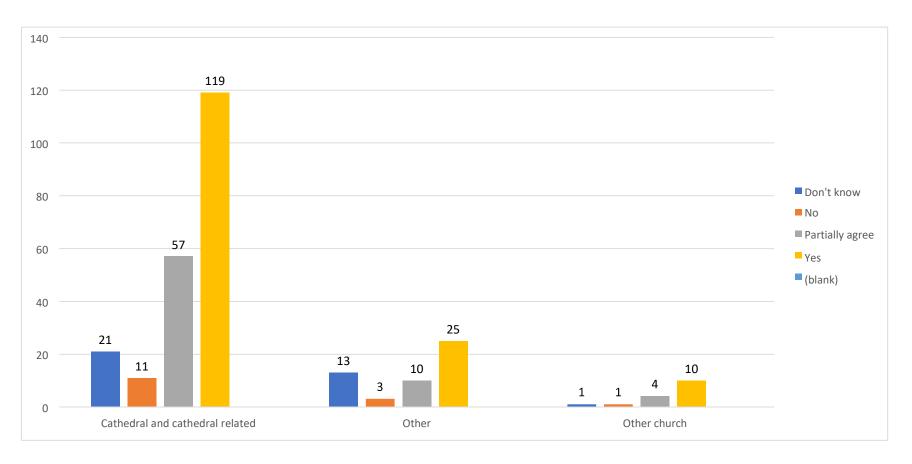


6C
Each cathedral covered by the Cathedrals Measure should receive a minimum grant equivalent to the stipend, pension and national insurance costs of itsdean and two full-time equivalent residentiary canons

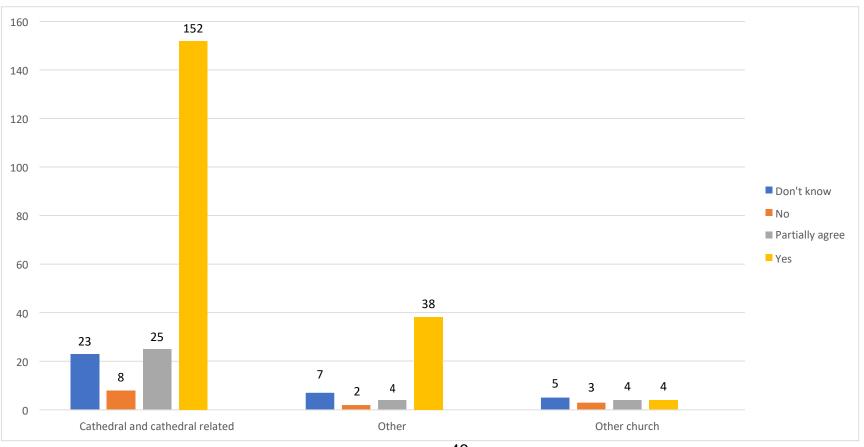


#### 6D

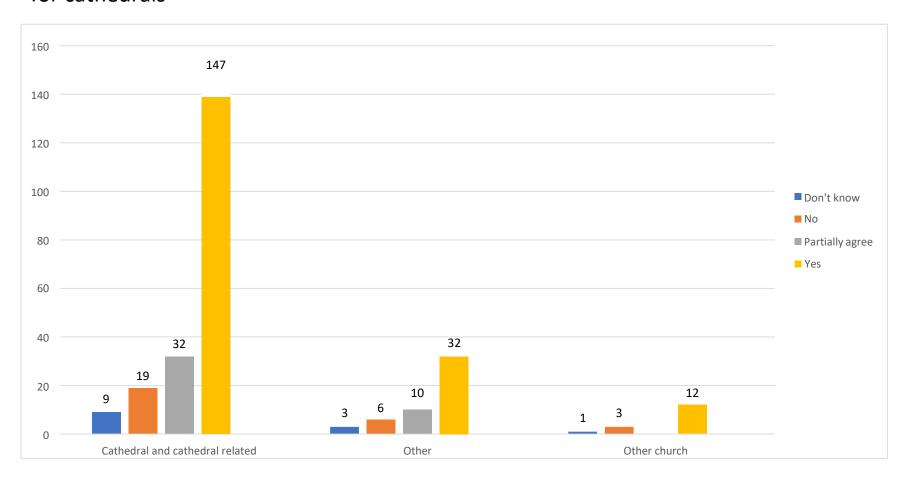
Consideration should be given by the national church bodies, in consultation with the AEC and cathedral COOs and CFOs, to revising the basis of the allocation of the residual funding (i.e. beyond the costs of a dean and two full-time equivalent residentiary canons), based on financial need, but rewarding enterprise, good governance and financial management, and that the scale of financial obligations and historical financial and other assets are taken into account.



6E Consideration should be given to releasing further funding for cathedrals from within the Church Commissioners Funds.

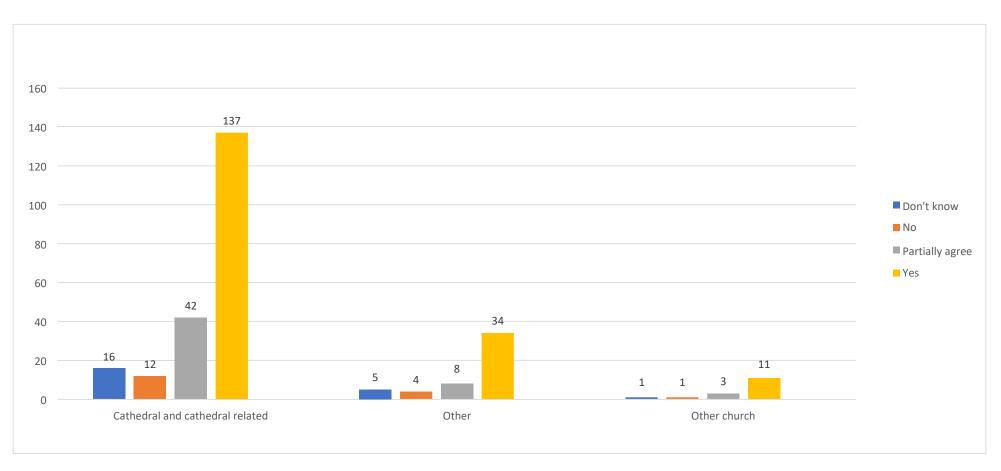


7A
A dialogue should be opened up with the government regarding possible state funding for cathedrals



#### 7B

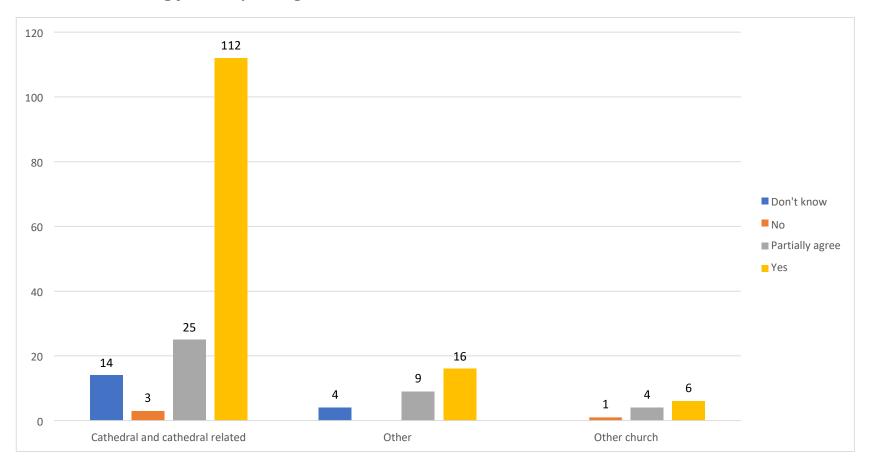
The NCIs and AEC should work jointly on an approach to Government and large philanthropic organisations with the aim of establishing a significant, possibly endowment based, cathedral fabric fund for the UK. This must be carefully considered alongside a funding strategy for parish churches, to ensure the differences in scale and need are fully appreciated



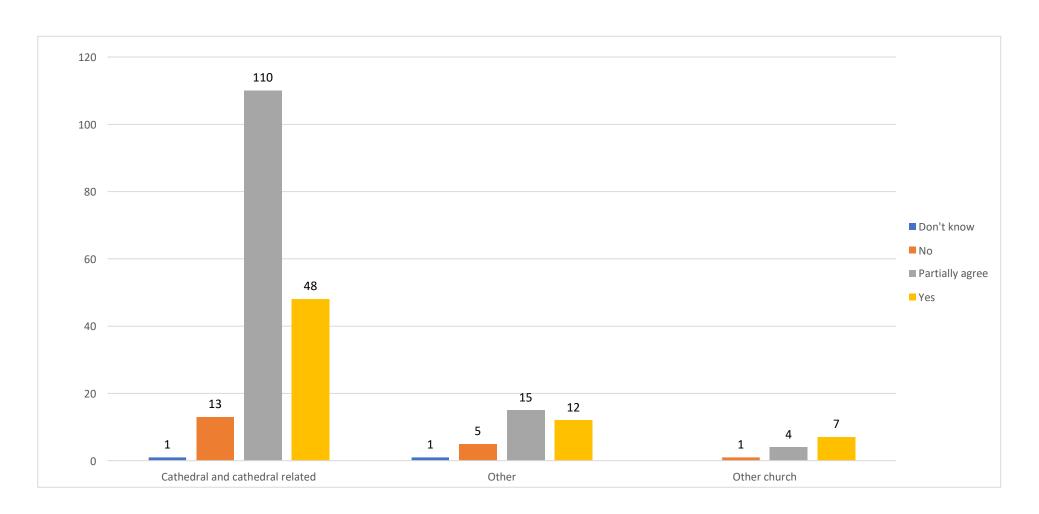
# Section 2

Optional section linked to the recommendations of the report

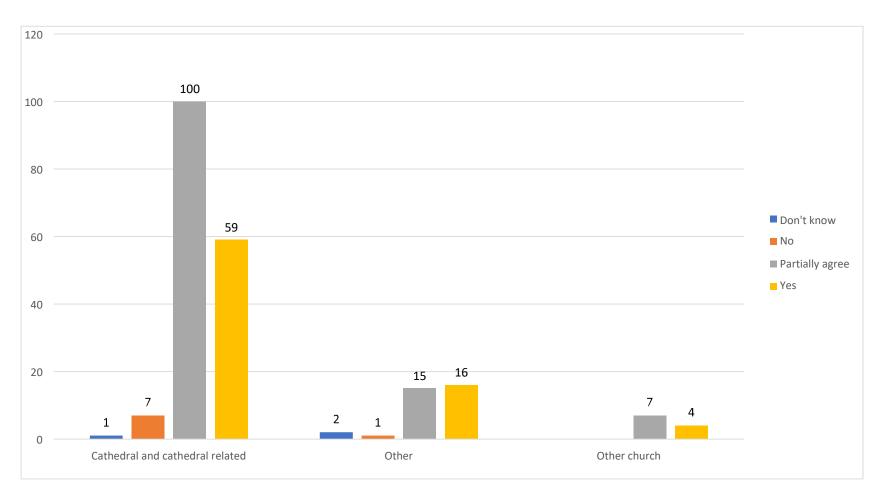
### Mission and Ecclesiology – do you agree with these recommendations?



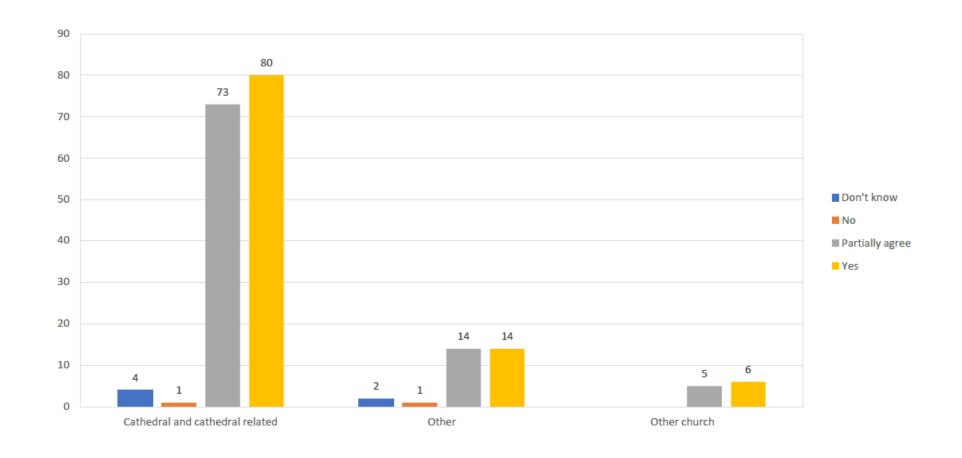
### **Governance** – do you agree with these recommendations?



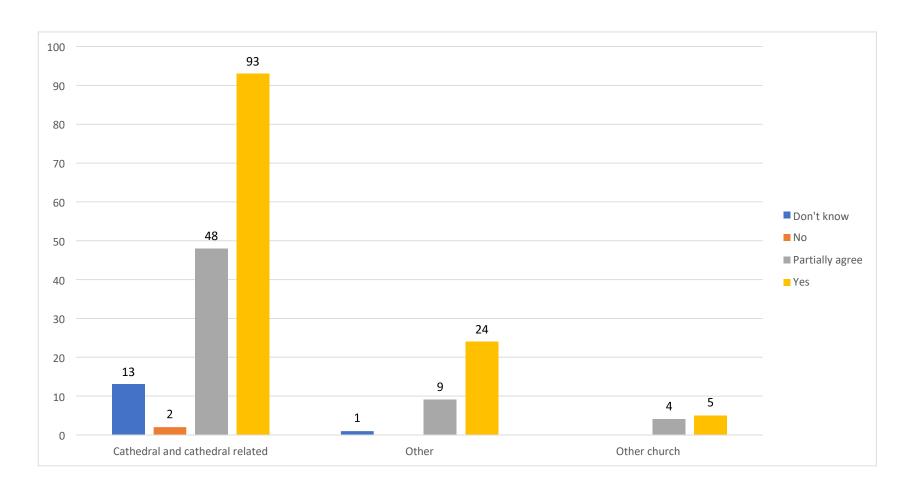
### **Leadership and Management** – do you agree with these recommendations?



### **Finance**- do you agree with these recommendations?



## **Buildings** – do you agree with these recommendations?



## **Safeguarding** – do you agree with these recommendation

