

## 2012-2014 FEES ORDER – RATIONALE

### An explanation of the proposed fee levels

#### Background

1. This is the first Order to be made under the Ecclesiastical Fees (Amendment) Measure 2011. The Measure received Final Approval from the General Synod at the February 2010 group of sessions, with overwhelming majorities in all three Houses. It then went through the stages of parliamentary consideration and received Royal Assent on 24 May.
2. A report on implementing the Measure (GS1813) was considered by General Synod at the February 2011 group of sessions. After a full discussion, Synod agreed to take note of the report. That report and the points made during the Synod debate have informed the work which has led to the figures in the proposed Fees Order.
3. By way of summary, the Measure:
  - provides for fees to be payable to Parochial Church Councils and to Diocesan Boards of Finance, in the latter case replacing the present ‘Incumbent’s Fee’;
  - establishes a list of services and other duties for which a fee may be prescribed; this will include services not previously covered such as Memorial Services and Services of Prayer and Dedication after a Civil Marriage;
  - recasts the powers of the Archbishops’ Council to draft a Fees Order prescribing those fees; such an Order (which is subject to approval by Synod and Parliament) may be made for 5 years at a time, specifying annual increases within those 5 years according to a formula decided by the Council;
  - gives an express power to prescribe what costs and expenses are included within each fee;
  - clarifies the powers to waive fees; and
  - abolishes all ecclesiastical fees for funerals of those under the age of 16.
4. This Fees Order is drafted by the Archbishops’ Council and now brought to Synod for approval. In addition to this paper, the Council has prepared guidance for dioceses. The current draft of that guidance is attached as Annex 1 and may usefully be read alongside this paper: it touches on a number of matters, including many of those raised during the Synod debate in February 2011. The guidance remains draft and is open to amendment and refinement until published by the Council.

#### Ecclesiastical Fees - General Considerations

5. GS1813 touched on a number of general considerations and principles to be taken into account when considering the level of fees. The overall context, strongly affirmed by the Synod debate, is the Church of England’s pastoral and missionary ministry to the nation. The mission potential of these pastoral opportunities must not in any way be weakened by the fees that are levied. Though fees may provide a reasonable contribution towards the costs incurred in providing the ministry in question, our ministry is one of mission not money-making.
6. GS1813 – of which the Synod took note in February – proposed four general principles. These were that:
  - a. **Fees should be justifiable on the basis of a relationship to actual costs incurred;**
  - b. **There be uniformity across the Church of England in the fees specified;**

- c. Fees be as inclusive as possible, leaving 'extras' to apply only to those items over which people have a genuine choice;
- d. Fees be affordable, though noting also the clarified right to waive fees in cases of clear hardship.

### **Fees due to a Diocesan Board of Finance (DBF)**

7. The fees due to a DBF are calculated by reference to the costs incurred in providing authorised ministry. The starting point is the cost to a DBF for a full time stipendiary minister (at present reckoned to be c.£44,000pa) adjusted pro rata for the average ministerial time likely to be devoted to the ministry in question. There are necessarily some assumptions made in this calculation (e.g. about the number of hours a minister might be thought to be 'at work'), but the Council judges that the resulting cost of just over £21.00/hour for a stipendiary minister is reasonable.
8. While this fee is based on costs relating to a stipendiary minister, that is simply a basis for calculation. The fee is not a payment for a particular minister, so it is payable irrespective of whether the officiating minister receives a stipend or not.
9. This fee belongs in law to the DBF; it is, therefore, for each DBF to decide how this income will be applied. It is likely that most of this will be towards stipends, but DBFs may also wish to apply some fee income to CMD, promotion of church marriages and covering the DBF's own administration costs. This is touched on in more detail in the Council's guidance to dioceses.
10. The guidance to dioceses also suggests a level of remuneration (80% of the DBF fee) to be offered to ministers (clergy and Readers), including the retired, who are not in receipt of a stipend. This amount needs to be a reasonable remuneration, bearing in mind that we rely on the willing participation of such ministers in order to offer a universal ministry to the nation

### **Fees due to a Parochial Church Council (PCC)**

11. The proposed fees due to a PCC are built up from a number of elements. These fees are those that prompted the most discussion during the February 2011 Synod debate, so the following paragraphs seek to respond to some of the points made.
12. The first and main element of the PCC fee relates to the location (i.e. church building and/or churchyard). The calculation starts from national figures for the total costs of running and maintaining our church buildings – some £300 million each year. Dividing this by the number of churches and an assumption about average hours in use, gives a cost of £35.75/hour. This is inclusive of all building-related costs, including heating.
13. Two particular issues were raised in the Synod discussion in relation to this building-related element. The first was the possibility of separating heating costs from the global figures and allowing them to be charged as extras, thus introducing an element of variation. The second was the possibility of 'banding' church buildings according to size and/or cost in use, with the fee varying according to the band.
14. Both of these options would go against either or both of principles (b) and (c) in paragraph 6 (above). The principle of uniformity across the Church of England argues for charging the same fee regardless of location. The principle of inclusiveness argues for keeping to a minimum those items which fall into the 'extras' category and which, therefore, introduce variation as between parishes.
15. The draft Parochial Fees Order that has been laid before the Synod is, therefore, based on including all building-related costs averaged through the year. In general more weddings take place in summer and more funerals in winter, so spreading the buildings element across all fees

should balance out overall. The Council intends to keep this issue under review in the light of experience and will consider when preparing the next Fees Order whether the heating component should continue to be included within the prescribed fee. But the present Order is such that no such costs may be charged as 'extras'

16. On banding, while the argument in favour of it is clear, the legal advice is equally clear that the Measure would not permit such an approach. In any event, there would also have been practical issues in agreeing an acceptable and transparent means of defining the bands. Perhaps most importantly banding would, as stated above, go against the principle of offering a universal service to the people of our nation on the same terms, regardless of the parish in which they happen to live.
17. A PCC facing local costs which are out of the ordinary may of course invite additional voluntary donations from those seeking the church's ministry but they must be genuinely voluntary and not treated as if part of the fee.
18. The second element of the PCC fee relates to staffing costs related to the building. While the fee does not depend on the actual employment of a vergers or caretaker, it is calculated so as to cover that cost should a PCC decide to employ such a person. There is an assumption that there will need to be somebody (whether employed or a volunteer) present other than the minister in order to prepare the building, welcome people and clear up afterwards. Because this element is included within the prescribed fee, a charge for a vergers or caretaker will no longer be allowed as an 'extra'.
19. The third element of the PCC fee relates to staffing costs in relation to administration. Again, while the fee does not depend on the actual employment of a secretary or administrator, it is calculated so as to cover the cost should a PCC decide to employ such a person. Such a fee is prescribed for a funeral service at a crematorium as well as for services taking place in the church; this recognises that there are administrative and other demands on the parish when one of their ministers officiates at such a service. Because this element is included within the prescribed fee, a charge for administration will no longer be allowed as an 'extra'.

### **'Extras' and payments to others**

20. Allowable 'extras' are mainly sums that will be payable to others, over which those receiving the ministry have a genuine choice. Such payments are often passed through the PCC, and include payments to flower-arrangers, musicians and bell-ringers. A PCC may also offer services such as the printing of service sheets, which would also fall into this category.
21. Particular concern has been expressed about organists taking a fee when another organist plays, and lack of clarity about when a recording is such as to justify an additional fee. These are contractual matters between the various parties involved and not issues for a Fees Order. PCCs need to take care over the wording of their contracts with organists. The Archbishops' Council has asked RACSC to conduct more structured discussion of these issues with the representative bodies for church musicians.

### **Overall levels and transitional arrangements**

22. The proposed Fees Order shows some fees increasing and others decreasing. This is to be expected, given the new and clearer basis of calculation for fees. Indeed the rationale for the various fees set up to now has been far from clear. Some apparent increases are in practice less marked than they appear because the prescribed fee now includes elements previously charged as extras. For example, the current basic fee for a wedding (including publishing banns) amounts to £284, but many PCCs then seek to add various additional charges for administration,

cleaning, special heating etc. The new fee is £425 with no such extras allowable. That means that in a number of churches the fee may in fact be lower than what is currently charged.

23. Because other denominations often follow the Church of England's fee levels, we are not really in a position to compare our fees with those of other churches. However, some reference to the fees charged by various civil celebrants is instructive:
  - a. Wedding: £330 for the celebrant, i.e. excluding all legal and premises costs; this compares to the proposed £160 as the DBF fee; an additional £60 is charged by civil celebrants for a rehearsal.
  - b. Funeral: £160-£200, again only for the celebrant; the equivalent DBF fee is £135.

It should also be noted that the average total cost for a wedding in the UK is in the region of £18,000

24. One service where the change to the new fee level would have been particularly sharp is a funeral service in church before or after cremation. The current fee of £102 is considerably lower than would be produced by the new calculation based on actual costs incurred. This is in part because of a longstanding policy to hold down this fee in order to make it the same as the fee for a full service at a crematorium and thus avoid discouraging services in church. The Council has decided to retain the existing policy. As a result this fee is being held below the level which would be produced by the new cost-based formula.
25. The fee for a full funeral whether in church or at a crematorium still shows a significant increase (£102 to £150), and the draft Order makes provision to reflect this. Again, it is not possible to make a like for like comparison between the two figures since there will now be no scope for charging extras.
26. The proposed Fees Order proposes a 3% increment for each year covered by the Order (at present CPI is 4.5% and RPI is 5.2%).
27. Under the new Measure the Council has the power to propose an Order valid for 5 years. Since, however, this is the first occasion on which fees have been set on the new basis the Council has decided to make an Order for 3 years, so that there can be a reasonably early opportunity to review the workings of the new system and fee levels in the light of experience.

**The Archbishops' Council June 2011**

## **Ecclesiastical Fees (Amendment) Measure 2011 FEES ORDER 2012-2014**

### **DRAFT ARCHBISHOPS' COUNCIL GUIDANCE FOR DIOCESES**

*These guidelines sit alongside the Ecclesiastical Fees (Amendment) Measure 2011; they seek to assist dioceses to implement the Measure and also offer related guidance and examples of good practice. While some of this guidance will be relevant mainly to Diocesan Boards of Finance and their staffs, other elements will merit being communicated to clergy and PCCs - suitably adapted to reflect the policies and procedures of the particular diocese.*

#### **Introduction**

- i. While the formal scope of work around the Measure has been to do with parochial fees, their ownership, levels and management, those undertaking this work have been reminded strongly about the importance of the Church's ministry at and around pastoral services. The opportunities offered for pastoral mission continue to be considerable, as has been demonstrated through the current Weddings Project
- ii. It is also clear, however, that the Church of England offers pastoral services and ceremonies alongside other celebrants. In the light of this we need to underline the importance of:
  - Clergy and other ministers seeing ministry through pastoral services as a high priority for the mission of the church;
  - A focus on the quality of ministry offered on these occasions – this needs to be so high that the Church of England is clearly the best choice;
  - Simplicity and transparency in the financial, legal and administrative aspects;
  - Flexibility and imagination in responding to the needs and wishes of those to whom we minister, bearing in mind that they can usually go elsewhere.
- iii. This context has been very much in mind as this work around fees has been undertaken.

## **DETAILED GUIDANCE**

### **Ownership and destination of fees**

1. Under the Measure a fee is in all but a few very cases (e.g. in relation to Cathedrals) the property either of a Diocesan Board of Finance (DBF) or a Parochial Church Council (PCC). In general, the DBF fee relates to the provision of authorised ministry (the costs of which are usually borne by a DBF) and the PCC fee relates to church buildings and local administration and ministry costs. A PCC may also act as 'agent' for payments to musicians and others. The 'Incumbent's Fee' will, therefore, become a thing of the past; Because the fee belongs to the DBF, assignment of fees (and all the connected administration) becomes a thing of the past – other than for those retaining freehold who do not currently assign fees.

### **Level of fees**

2. It is for the Archbishops' Council to prepare a Fees Order for approval by the Synod and Parliament. Under the Measure, such an Order may run for up to 5 years with annual increases provided for therein; the level of fees will, therefore, be known several years in advance. The first such Fees Order is, however, that for 2012-2014, a decision having been made to make a 3-year Order in the first instance so as to give opportunity for early review of the new arrangements.
3. Information about what is covered by each fee is given below. The general principles, however, are that the level of fees will be justifiable, transparent and as inclusive as possible, while also providing a reasonable contribution to parishes and dioceses for the provision of the ministries concerned.
4. The statutory fees will be publicised nationally on the Church of England's website and dioceses are encouraged to do the same. The matter of consistency is important in an age when those receiving our ministries may easily find out what is charged in different parishes.

### **Diocesan Advice**

5. Clergy, Churchwardens and PCC Treasurers are likely to need advice from time to time concerning fees and other matters to do with pastoral services. There will be situations where some flexibility or discretion needs to be exercised, and those in parishes should know to whom they may turn for advice. In many cases this will be the Archdeacon or Diocesan Secretary, but some dioceses also have a named funerals officer; these people will need to have access to the necessary information.

### **Administration of Fees**

6. It will be for each diocese to decide how it wishes to manage the flow of fee moneys between the DBF, PCCs and those ministers who carry out duties that attract fees (on the latter, see below on 'ministers not in receipt of a stipend'). In making those arrangements, the following points may be helpful.
  - a. At present the usual flow is through PCC/incumbent to (as appropriate) DBF and other recipients and it may be appropriate for this to continue as the normal pattern. However, it is strongly suggested that incumbents should not handle fees but that the PCC should be the local agent.
  - b. Some funeral directors are, however, indicating that they would rather make a single monthly electronic payment (with detailed manifest) to one place. This would presumably be to the DBF, thus making the DBF the agent for such fees.

- c. The possible discontinuation of cheques by banks may hasten the need for some such more centralised diocesan provision for receiving fee payments. In any case, the use of cash should be strongly discouraged.
- d. Whatever the process adopted, the keeping of proper records for audit purposes is vital. If PCCs are involved, dioceses may wish to provide simple record sheets (paper or electronic) to ensure this. Where PCCs act as agents collecting payments for others proper records will again be needed. Examples of forms as used in some dioceses are available from Church House.

### **The DBF Fee**

- 7. This fee due to the DBF is intended to cover the full cost of providing authorised ministry – it is not a fee for the services of a particular minister. The fee is, therefore, payable to the DBF regardless of who the actual minister is and whether or not they receive a stipend. The recommendations to the Archbishops' Council on the level of fees are built up from assumptions about the costs of ministry and the likely number of hours needed to provide a good ministry for the particular service. It is for each DBF to decide how it wishes to allocate its fee income, but a guide might be 80 % to stipends (this being also the amount it is suggested should be offered to non-stipended ministers – see below) with the remainder applied to Continuing Ministerial Development (CMD) (see para 21 below) and diocesan administration.

### **PCC Fees**

- 8. The fees due to a PCC are intended to be as inclusive as possible in order to minimise the scope for 'extras' and the inconsistencies that sometimes arise from them. The level of fees is built up from assumptions about PCC costs of ministry and the time taken in support work. These fees have a number of elements.
  - a. A location/building element based on statistics for the overall costs of repairs and maintenance of church buildings plus assumptions about the number of hours in use. It is not permissible to charge additional sums for these as 'extras'.
  - b. An element for building-related staffing (verger/caretaker) based on assumptions about pay rates and hours likely to be worked for a particular service. The whole fee, including this element, is payable whether or not a person is actually employed to do this work. The principle is that the minister should be giving their attention to the people and the service, so somebody else will be needed to deal with other matters.
  - c. An element for administrative staffing based on a secretarial rate of pay. Again the whole fee is payable whether or not a person is actually employed in this capacity. For the first time, a PCC will receive this fee even where the service takes place at a crematorium.
- 9. There is no provision for variable charges according to size of building. The legislation does not give the Council power to introduce any such variation. Nevertheless, the Working Group felt that it had to consider this issue, and has decided to advise the Council to set a uniform building element at a level which is generous enough to cover the large majority of situations. The Group had two reasons for coming to this decision: (i) the desire to maintain a uniform fee wherever a person happens to live, and (ii) the difficulty in establishing a legally clear method for 'banding' church buildings. Exceptional cases may be approached through inviting additional voluntary donations following consultation with the archdeacon or other diocesan adviser.
- 10. The expectation is that these arrangements will see PCCs receiving more income overall. This recognises not only the costs of maintaining our buildings but also the local costs associated with offering a good ministry around pastoral services, even when much of that ministry may be provided by lay volunteers.

## **The PCC as agent for others ('extras')**

11. Under the new legal provisions, the only 'extras' that may be charged are those items over which those receiving the ministry have a genuine choice – music, flowers, bell-ringing etc. It is likely that the PCC will act as the agent collecting these payments and passing them on to those who offer the service in question. The levels for these charges do not lie within the remit of the Archbishops' Council or the DBF, but the following advice is offered:
  - a. Information given to those seeking a pastoral service should be absolutely clear about the level of any charges and what they cover;
  - b. The guidance offered by the Royal School of Church Music, Incorporated Society of Musicians, Diocesan Guild of Church Bell Ringers and others such bodies should be taken into account when setting the levels for these charges;
  - c. For employed church musicians, the entitlement to receive fees should be clearly expressed within the PCC's contract with that person; model contracts are available from the RSCM and others;
  - d. The matter of entitlement to receive a fee even when another person (e.g. a family friend) plays the organ must be clear in the contract as this can often be a source of misunderstanding and friction;
  - e. Entitlement (or not) to an additional fee when a service is recorded/filmed should also be clear in any contract and in information given to those seeking a service; it is worth observing that the advance of technology makes this a problematic area – is a recording on a guest's mobile telephone such as to trigger an additional payment?
  - f. In its role as 'agent', a PCC must make sure that proper records are kept for audit and other purposes; cash payments should be avoided. The PCC should also make clear to those receiving payments that they (not the PCC) are responsible for declaring their payments to HMRC for tax purposes.

In relation to (d) and (e) above, it is expected that there will be national discussions with the representative bodies for church musicians aimed at agreeing a clearer basis.

12. Overall, clarity of information is the key.

## **When a fee is payable / Waivers**

13. The Parochial Fees Order prescribes when a fee is payable. There may, however, be a few occasions when a judgement needs to be made on whether a service is within the description of a service contained in the Order. There is a fairly obvious difference between a pastoral service/ministry which is a public service (with a fee payable if it is a service of a description contained in the Order) and more private, pastoral ministry/prayer with family/friends only. For example, simple prayers with a couple and a few friends on a significant wedding anniversary would not normally constitute a 'Service of Thanksgiving for marriage' for which a fee is payable; and private prayers with a bereaved family on the anniversary of a death would not constitute a 'Memorial service'. Clergy and churchwardens will need to exercise their judgement in such cases, consulting the Archdeacon where necessary.
14. The fees for burial/cremation immediately before or after a funeral service in church differ from those for burial/cremation on a separate occasion. The Measure states that this provision includes the preceding or following day.
15. The Measure makes very clear who has power to waive fees: this is the incumbent or priest-in-charge of the benefice concerned - after consultation with the churchwardens for PCC fees. An incumbent/priest in charge cannot waive fees generally. They may only be waived "in a

particular case”. That means that the incumbent/priest in charge must be able to point to something about the particular case that would justify waiving the fee.

16. No parochial fees are payable in relation to the death of a person who has not reached the age of 16.
17. DBFs may wish to offer advice to clergy about how and when they may wish to exercise their right to waive fees. The Council’s advice is that this should only be in cases of clear financial hardship. It is understandable that some clergy have been known to waive fees for those who are long-standing members of the congregation. The Council believes, however, that this practice should not be encouraged, certainly as far as the DBF fee is concerned.

### **Ministers not in receipt of a stipend**

18. As already stated, the DBF fee is legally owned by the DBF and is for the DBF to decide to which of its purposes that income should be applied (see para 5, above). It is, therefore, for a DBF to decide what remuneration might be paid to those ministers who are not in receipt of a stipend (SSMs, retired clergy with PTO, Readers/LLMs). It is clear that the ministry of such ministers is vital if we are to continue to offer to the nation a universal ministry around the pastoral services – generosity in remunerating those ministers is, therefore, important. A particular question has arisen over Readers/LLMs where some dioceses already remunerate such ministers for ministry at funerals etc. The following guidance is offered (but it is for each DBF to decide whether to adopt it).
  - a. The remuneration for a minister not in receipt of a stipend be set at 80% of the fee receivable by the DBF;
  - b. That remuneration (at the 80% level) be *offered* to all ministers (including SSMs and Readers/LLMs), though some may of course decline it, or receive it and then donate it to PCC or DBF. Advice has been received that such remuneration, on a casual, ad hoc basis, would not normally constitute an employment relationship between a DBF and the minister concerned (but Diocesan Registrars should be consulted where arrangements are put in place that go beyond paying ministers on a casual basis – for example where retired clergy undertake to conduct a minimum number of services for an agreed overall sum). There will need to be a (confidential) signed agreement between the DBF and each Reader/LLM as to whether or not they wish to accept the offer of remuneration;
  - c. An alternative in relation to Readers/LLMs is that DBF fees received where such a minister has officiated be allocated to the relevant Readers’ Board/Association to help defray the costs of training etc.
  - d. In all cases, it should be made clear to ministers receiving such payments that they are responsible for declaring this income to HMRC for tax purposes.
19. DBFs will need an administrative system for making these payments to non-stipended ministers. This might easily be incorporated within an existing system for ‘Casual Duty’ payments, with the remuneration on offer being listed along with those for other services.
20. For stipendiary and other licensed ministers (including Readers/LLMs) matters relating to fees and associated ministry will be coverable under either or both of a Statement of Particulars (clergy) or a Working/Ministry Agreement (Readers). Ministers with Permission to Officiate (PTO) have no such document, but it is strongly recommended that bishops/dioceses put in place a ‘Ministry Agreement’ to sit alongside a PTO; this could cover:
  - a. Whether remuneration for pastoral services may be claimed;
  - b. The processes for claiming such remuneration and the importance of HMRC declaration;

- c. A requirement to liaise with the incumbent or priest-in-charge of the benefice in question when exercising a ministry;
- d. Access to CMD relevant to the ministry being exercised (see para 21, below)
- e. Arrangements for review/renewal of PTO, relationships with Rural/Area Dean and other matters as a diocese may think useful.

Dioceses will in any case need to communicate the new arrangements clearly to all clergy, including the retired, and to Readers/LLMs.

### **Continuing Ministerial Development (CMD)**

- 21. Throughout the work on revision of fees, reference has been made to the importance of offering an excellent ministry at and around pastoral services. In order to help achieve this aspiration, it is recommended that training to support licensed ministers (including the retired) in their exercise of the pastoral offices should be a regular part of diocesan provision. Many dioceses already make such provision (not least on the back of the Weddings Project), and the possibility will now exist of applying a part of the DBF's fee income to this.

### **Availability of Ministers**

- 22. The offering of a universal ministry for pastoral services depends on the Church of England being able to make available ministers as required. Funeral directors in particular have made representations at national and local level about the difficulties they experience in contacting ministers when families require an immediate response about arrangements. It is in the church's interests to maintain good relationships with funeral directors and to seek to respond to their concerns; it is, therefore, recommended that diocese make every effort to ensure the availability of ministers. The following suggestions are offered.
  - a. Encouragement of clergy (especially through CMD in the initial years) to see such ministry as important and worthy of prioritisation;
  - b. Development of the ministries of non-stipended ministers (including Readers/LLMs) around pastoral services;
  - c. Provision in deaneries and/or dioceses of a simple system whereby the availability of a minister (even if at first unnamed) is guaranteed to a funeral director. Examples of a diocesan scheme (Winchester/Portsmouth) and a deanery scheme (Southwell and Nottingham) are available/attached;
  - d. Maintenance of good and regular contact between archdeacons (and even bishops) and funeral directors in the area.

### **Disability Issues**

- 23. Quite apart from any legal requirements under the Equality Act 2010, our commitment to the universal offer of pastoral ministry requires us to provide as fully as possible for family members and others who have particular needs. Dioceses should seek to make information available to ministers about local sources of advice, provision of signing services etc. Some dioceses will have specialist chaplains who may be used/consulted; there may also be relevant voluntary bodies in the area. However, whatever other sources of advice/support may be available, the DBF will need to be ready to bear any additional costs as this is part of providing the ministry for which the DBF's Ministry Fee is intended.

## **Complaints**

24. It is not uncommon for complaints to arise concerning ministry at pastoral services. These are often addressed to bishops or archdeacons, though may also come to incumbents if they relate to another minister within the benefice.
25. A complaint may be about a matter connected with the arrangements for the service. These should be handled locally
26. If the complaint relates to the conduct of clergy (including those with PTO), it will be for bishops/archdeacons to decide how to handle the complaint; the provisions of the Clergy Discipline Measure 2003 and/or Clergy Terms of Service Regulations may be relevant; reference to the Guidelines for the Professional Conduct of the Clergy may also be helpful.
27. If the complaint relates to the conduct of Readers/LLMs it is likely that the matter will initially be for the incumbent concerned and the Warden of Readers, though the Archdeacon may also need to be consulted and the Bishop involved.
28. If the complaint relates specifically to fees, then the Archdeacon is likely to be the obvious person to investigate the matter, if the complaint cannot be resolved by the incumbent or PCC.

## **Transitional Arrangements**

29. Any incumbent holding office on the coming into force of section 5 of the amending Measure who is entitled to receive a fee relating to any matter under a Parochial Fees Order shall, if he or she has not assigned the fee to the DBF, and notifies the bishop in writing within six months of the coming into force of section 5 that he or she wishes to preserve that entitlement, so long as he or she holds office, be entitled to receive the fee which would otherwise be payable to the DBF. This will apply whether or not he or she chooses to go onto common tenure.
30. An incumbent who has not assigned his or her fees and who wishes to preserve his or her entitlement must give written notice to the bishop during the period [            ] to [            ].

## **Implications for Diocesan Administration**

31. At various points in these notes there are clear implications for diocesan administration. Examples would include the establishing of payment processes with PCCs and/or funeral directors, and the handling of payments to non-stipended ministers. It is, therefore, inevitable that there will be additional administrative tasks, except where dioceses already have similar arrangements in place. However, the whole system relating to assignment of fees will disappear (because the fee will belong to the DBF rather than the incumbent) and that should release administrative time for reallocation. In addition, the suggestion is made above that some fee income be applied to diocesan administration.

## **Sources of Advice**

*Contact details to be inserted.*

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