

THE ARCHBISHOPS' COUNCIL
DRAFT LEGISLATIVE REFORM (PATRONAGE OF BENEFICES) ORDER
EXPLANATORY DOCUMENT

Annex C

Consultation on the Patronages (Benefice) Measure 1986

Proposal 1

20. The bishop would be required to give notice of the vacancy to the designated officer not later than the day on which the benefice becomes vacant in the case of resignation or retirement; or as soon as practicable in the case of an incumbent dying in office. (In the case of resignation or retirement, it would continue to be possible for the bishop to give the notice before the vacancy in the benefice occurs where the bishop considers it appropriate to do so.)

21. The designated officer would be required to give the notice of the vacancy to the PCC secretary as soon as practicable after receiving the notice from the bishop.

22. The notice given by the designated officer to the PCC secretary would—

- a) **state the date on which the benefice had become vacant;**
- b) **provide the 'start date' for the statutory timetable for filling the vacancy;**
- c) **provide information about the statutory process, especially with regard to the duties the PCC has in that process.**

23. The 'start date' for the statutory timetable would be the date on which the notice is sent by the designated officer to the PCC secretary or, if the bishop has so directed, a date not later than 3 months after the date of the vacancy.

24. While the bishop, archdeacon or rural dean is likely already to have been in touch with the PCC at an early stage and begun to guide them through the process, the continuation of the requirement for a formal notice, accompanied by other information, from the designated officer should ensure that the PCC are reminded of the duties they need to carry out in relation to filling the vacancy and that they are informed of the timetable for doing so.

25. If the bishop considers that there are special reasons in relation to a particular benefice, in the light of which a delay in starting the formal process would be advisable, the bishop should use the existing power under section 85 of the Mission and Pastoral Measure 2011 to suspend presentation after consultation with the patron, PCC and deanery synod chairs and with the consent of the diocesan mission and pastoral committee. The power of suspension can be exercised at any time within three months before a benefice is due to become vacant or at any time during a vacancy. If it is exercised, the statutory procedure for filling the benefice does not apply until the suspension comes to an end. Alternatively, if the diocesan mission and pastoral committee are considering proposals for pastoral reorganisation involving the benefice, the bishop may give notice under section 87 of the Mission and Pastoral Measure 2011 restricting the right of presentation for a period of up to one year. In any case, if proposals for pastoral reorganisation have reached a particular stage a restriction on presentation to a vacant benefice arises under that section and the process for filling the vacant benefice under the Patronage (Benefices) Measure 1986 is automatically stayed.

Questions on Proposal 1

26. Do you agree that significant delay in the commencement of the process for filling a vacancy should normally be avoided?

27. Does the mechanism set out in proposal 1 provide a suitable means of avoiding unnecessary delay?

Bishop of Whitby	Proposal 1 seems sensible, in that if there is the possibility of reorganisation the presentation would be Suspended anyway, and the recent legislation allowing the appointment of an Interim Priest-in-Charge is helpful in facilitating the support of a parish through a time of discussion and change
Archdeacon of Norfolk	Yes, it is generally helpful to begin the process and any legislative change should make it clear that this can happen while the departing priest is still in post, but without him/her being involved.
Rev David Keen	26. Yes 27. In part. The proposals will mean, in practice, that notice of the vacancy is given at the time it becomes vacant, rather than at the time a retirement/resignation is announced, which could be several months earlier. I would suggest that the announcement of the vacancy be given within a week of the announcement of a retirement/resignation, unless there is clear grounds for delaying this process, which must be stated to the parish.
Mike Todd, Lay Synod Member	Q26 I agree. Q27 Whilst I do not disagree with the specific proposals, I feel that we could go rather further in pursuit of the principle of avoiding delay. In the secular world (both public and private sector) the norm would be to commence the process of seeking a replacement as soon as a vacancy is known to be occurring ie immediately a resignation has been tendered. Of course there are always some exceptional circumstances when an immediate start is not desired, such as when there is a recruitment freeze or pending reorganisation. Consequently I would like to propose that the default timetable be based on the resignation date rather than the day of vacancy commencement but that provision should be made for the DMPC to determine a possible delay for stated reasons (which would need to be circumscribed). I deliberately place this option with the Pastoral Committee to put it on a par with suspension (with which it would have similarities) rather than the Bishop so that there is a wider set of views taken into consideration.
Archdeacon of Bodmin	Yes. Will there be guidance to the Bishop regarding the circumstances in which (s)he can delay the start date by 3 months? Will there be a time-limit within which this action must be taken?13
Joint Response from the Church Patronage Trust and the Peache Trustees	Yes
Karen Hall, Pastoral Secretary, Norwich	Yes
Angus Deas, Pastoral and Closed Churches Officer, Diocese of York	Q26. Yes. Comment. There are occasions when a delayed start is useful, eg the departure of a long-term incumbent; departure under unusual or contentious circumstances; death, even expected, to allow for feelings to return to normal. Q27. Yes

Revd Dr Adrian Hough Exeter DMP Sec	Yes
Ken Gumbley, Chairman, Legislative Committee, Sodor & Man Diocesan Synod	<p>The procedure for filling a vacancy in the Isle of Man differs slightly from that in England.</p> <p>(a) The functions of the 'designated officer' under the 1986 Measure are exercised in the Isle of Man by the registrar of the diocese.</p> <p>(b) The 1986 Measure, as it has effect in the Isle of Man, already contains power for the bishop, if he is considering whether or not to suspend the presentation, to direct that the notice to the patron and PCC secretary be delayed for up to 3 months.</p> <p>Questions on proposal 1</p> <p>A Yes, to both questions, subject to modifications to take account of the above differences.</p>
Niall Blackie Joint Registrar Diocese of Lichfield	<p>I agree with paragraphs 20-22, save that I would <u>not</u> give the Bishop the option to delay the start date for 3 months. If the Bishop wishes to use s87, he can do so, but the initiative should be one for the Bishop to promote formally.</p> <p>Questions:</p> <p>26: yes</p> <p>27: yes, save (i) as to the 3 month point (ii) and as to the start date being the date of the notices. I would suggest an alternative, that if the Bishop wishes he may make a s87 proposal at the same time as giving notice to the Designated Officer in which case the DO would not issue the Form 31; For my part I would suggest that the start date should be the date of the vacancy, not the date of the notices – the difference should only be a matter of a few days, and it will help to create a sense of impetus. We should not forget that the PCC will already know there is a vacancy and it can be working on provisional dates – the reason this time is currently 'lost' is that they do await formal instruction, in the sense of the –pre-s11-meetings which archdeacons currently fix before the Form 31 is sent out!</p>
Roland Callaby Diocesan Registrar, Bath & Wells and Bristol Dioceses.	Yes
Simon Baynes, Synod Member St Albans	<p>Paragraph 26: Yes, Delays should normally be avoided.</p> <p>Paragraph 27: No, the mechanism in proposal 1 does not go far enough. There is no need for the Bishop or anyone else to give notice that a benefice is to become vacant. As soon as the Bishop receives a letter of resignation, a letter informing him/her of an intention to retire or notification of an incumbent's death then "by definition" the benefice should be deemed as vacant from the date the Bishop received the notice of resignation, retirement or death. The 'start date for the statutory timetable' should be the date the Bishop received the letter of resignation or retirement or notification of death, not some arbitrary date chosen after this.</p>
Rev Katherine Price, Chaplain, Queen's College Oxford	<p>I am replying on behalf of The Queen's College, Oxford, which is sole patron of four benefices, and shares patronage in another 17, across nine dioceses.</p> <p>Yes. In our recent experience, the appointments process is very inconsistently applied between dioceses. One diocese has informed us that they will not issue a formal notice of vacancy until the process of preparing the parish profile is well advanced. Another by contrast made an appointment before the vacancy</p>

	<p>had actually arisen, and did not inform the patrons until after the shortlisting for interview had taken place, sadly with noticeable effect on the conduct of the appointment process. We hope that the mechanism proposed will lead to greater consistency, as well as protection for parishes, in light of the financial incentive for dioceses to delay appointment, and that a streamlined process will reduce any motivation to circumvent the procedure.</p> <p>Note that Paragraph 21 does not explicitly specify that the designated officer should notify the patron (although this is clearly anticipated by the following paragraphs).</p>
Neil Parsons, Chapter Steward Norwich Cathedral	Yes
Caroline Mockford Registrar of the Province & Diocese of York for and on behalf of Lupton Fawcett LLP	<p>26. I agree that significant delay in the commencement of the process for filling a vacancy should normally be avoided.</p> <p>27. The proposed mechanism, whilst making perfect sense in the abstract, does not recognise what happens in practice, in my experience.</p> <p>27.1 Whilst the legislation currently provides for the bishop to serve notice that the benefice is to become vacant and for the process under the Measure to begin immediately, my experience is that it is rare for there to be any significant discussion as to the filling of the vacancy until after the incumbent's tenure has come to an end. I believe that there are issues of very real sensitivity here; parishes feeling uncomfortable about being seen to discuss life with a new incumbent before the existing incumbent has left, concerns about incumbents putting pressure on parishioners behind the scenes, even though they are not able to attend PCC meetings held under s11 and s12. Those sorts of sensitivities disappear once the incumbent has gone. It seems to me that the proposal, if implemented, could simply result in the bishop giving formal notice of the vacancy only on the date the vacancy commences. If I am right, then mindful of the other aspect of the consultation relating to the work programme for the Legislative Reform Committee, I would simply remove the requirement for the bishop to give notice entirely. Instead, I suggest that the "start date" for the statutory timetable would start as soon as the vacancy arises and the designated officer would be required serve notice to that effect on the PCC Secretary and the patron as soon as practicable. I imagine that most dioceses have a process whereby a "round robin" is circulated to notify those within the diocese who need to be aware of the vacancy and it is that document that informs the designated officer of the vacancy long before the bishop's notice is issued. If there are concerns about delays on the part of the designated officer, one might require the designated officer to serve notice within, say 14 days of being notified of the vacancy or the date on which the vacancy commences, whichever is the later.</p> <p>27.2 My practical experience is that, currently, dioceses like to have informal discussions with the parish about the vacancy before the bishop's notice is issued. Although there will be contact with the parish at an early stage, as suggested in paragraph 24 of the consultation paper, I believe that the real discussions about the way in which the vacancy is to be filled are unlikely to begin in most cases until after the vacancy has arisen, for the reasons set out above. If the outgoing incumbent leaves the parish some time</p>

	<p>before the vacancy date, that will no doubt bring those discussions forward a little. The bishop will be provided with a report, insofar as he or she is not involved directly in those informal discussions with the parish, and only then will the formal notice of the vacancy be issued. This could be three or four months or more after the vacancy has arisen. The bishop's notice triggering the formal procedure under the Measure tends to be issued only when the decision has been made as to whether or not to seek a new incumbent or to begin the process to suspend the right of presentation. If the suspension option is chosen, the bishop's notice is simply not served at all. The proposal envisages that the formal procedure under the Measure begins come what may with the date of the vacancy, even if there is a genuine need to suspend. That may result in a standing direction to serve notice three months after the vacancy to give time for dioceses to continue this sort of existing practice, thereby building in delay.</p> <p>27.3 I suggest that it would be helpful to transfer the provisions relating to suspension of the right of presentation from the Mission and Pastoral Measure 2011 and integrate them into the Patronage (Benefices) Measure 1986 so that the interaction between the two courses of action are clearer. The procedure for filling a vacancy could include consideration as to whether or not consultation about suspension should take place in addition to the other matters that currently require consideration. The proposed guidance can give clarification about matters such as the way in which the vacancy process should be managed if it begins before the outgoing incumbent has left office, circumstances in which suspension is appropriate (particularly by reference to the impact of recent legislative changes in relation to compensation for loss of office) and the different processes that apply when an incumbent is appointed and when a priest in charge is appointed (about which I note that there is widespread ignorance). Such guidance would help change the mind set of dioceses who have not fundamentally changed their processes since the introduction of common tenure. The guidance could also incorporate or cross reference recent guidance concerning age limits and interim posts.</p>
<p>Jane Steen, Archdeacon Southwark</p>	<p>26. Not necessarily. It depends on the reason for the delay and on the management of the process. Parishes which have suffered some loss – death or discipline of the incumbent for example – probably don't need to be told to get on with finding another one asap. Parishes which have had a very dominant incumbent or an incumbent who has been in the parish for decades will likely fare better if they allowed to develop lay leadership in the vacancy, gain a sense of empowerment and take responsibility for the future direction of the parish. The way this question is worded makes me feel as though I am being asked to see it as self-evidently true that a benefice in want of an incumbent should not be made to wait for one by the delays of bishops. But I really do think that, while inappropriate delay is to be avoided, working with the parish at the start of the process to chart a timetable which is suitable for them, for the reasons I have outlined above, is a better guiding principle for the filling of a vacancy than avoidance of what might look like delay but is actually timeliness.</p> <p>27. No. It risks creating other problems as I have suggested above. Here is how I would consider it:</p> <ul style="list-style-type: none"> • A benefice becomes vacant on the day on which its last incumbent leaves for whatever reason.

	<ul style="list-style-type: none"> • There is then a one-year window in which to discern the next incumbent. Let us say that the benefice falls vacant on 31-12. So we would like a new incumbent to start at the latest on the following Advent Sunday since after Christmas is a bit daft. • The person has to serve three months' notice so should be appointed by 1st September. • August is a bit hopeless for appointing so we assume we will be advertising/ interviewing from in June and July. • Thus the profile should be ready by end May at the latest. <p>It may be possible to bring all this forward by a month so that the profile is ready by end April and the person appointed by 1st August.</p> <p>Advantages of this include time for holiday and moving in August and the possibility of another advertisement etc if the first round of candidates does not result in an appointment.</p> <ul style="list-style-type: none"> • So if the PCC needs to have the profile ready by end April, it really doesn't want its 'you have four weeks to do a, b, c' section 11 starting gun fired much before the start of March. That way, it has had January and February to at least think about what it wants, drafts to be produced if need be and people to begin stepping up a bit before it is up against a statutory timetable. It also allows it to consider in more time whether it wants a section 12 meeting and to find a date in the bishop's / patron's diary. <p>So one possibility might be that the Bishop, after consultation with the PCC – which in practice he would probably dispense the archdeacon to do – shall issue the notice of vacancy to the designated officer at such time as shall enable an incumbent to be appointed within one year of the benefice becoming vacant.</p>
<p>The Church Pastoral Aid Society (CPAS) include the Martyrs Memorial and Church of England Trust The Church Trust Fund Trust The Church Pastoral Aid Society Patronage Trust.</p>	<p>26 The CPAS Patronage Trustees agree that significant delay should be avoided in the commencement of process.</p> <p>27 This proposal positively provides a suitable means of avoiding unnecessary delay.</p>
<p>David Jenkins Archdeacon of Sudbury</p>	<p>26 Yes although I think there is merit in allowing a parish/benefice space and time to reflect on what has been and what lies ahead. Not too much haste!</p> <p>27 Yes although it does seem to provide an opportunity/temptation for 'no change' in terms of notification etc which is regrettable. Why wait three months unless there are clear specific reasons which are covered then by (25).</p>
<p>Jennifer Vere, Norwich Diocesan Board of Patronage</p>	<p>The Board was able to consider the relevant proposals at the last meeting of 2018, and are content that they will assist in streamlining operation of the Measure.</p>

The Revd J C Hugh Lee, Synod Member	Yes. There is a frequent perception (whether or not it is true) that dioceses are happy to delay the appointment of a new incumbent because it reduces their costs on stipends etc. Great care therefore needs to be taken in any publicity or other description of these changes to explain, firstly, that their intention is to reduce administrative burdens and, secondly, that all involved are being urged to expedite the process of appointing a new incumbent and to complete it in as short a time as possible to reduce the uncertainty and the negative impact such uncertainty has on the mission of the church.
Jane Lowdon Registrar of the Newcastle Diocese and the Carlisle Diocese	26. In an ideal world, yes. However, my experience is that the PBM processes are not commenced until well after a vacancy has arisen as decisions have not been reached at the point of the vacancy about whether the right of presentation should be suspended or the vacancy filled. 27. Theoretically, yes. However, as PCCs are also consulted about the appointment of a priest in charge it can be confusing for them to receive the formal paperwork under the PBM when the benefice is subsequently suspended and the bishop seeks to appoint a priest in charge instead.
Richard Morgan, Synod Member and Ely Patronage Board	Having consulted with other Patrons the only problem obvious to me is that caused by a Bishop as discussed in paragraph 16 of the 'Consultation on a Legislative Reform Order'. Proposal 1 (paragraph 20) speaks of 'The Bishop would be required to give Notice ...' - but what if the Bishop fails to do so for whatever reason. There should really be a procedure laid down by which the Patron or other interested party be enabled to give the Notice if the Bishop has failed to do so within 14 days.
The Venerable David Bailey Chair – Simeon's Trustees and Hyndman's Trustees	Yes. Further comments 1. Notwithstanding the proposed requirement for the bishop to give formal notice not later than the day on which the benefice becomes vacant, we hope that the guidance will give strong encouragement for informal activity as envisaged in Para.24 to take place and for the bishop/archdeacon to alert the patron informally at the earliest opportunity to the prospect of a forthcoming vacancy. If similar wording to Para.24 is used we would welcome the inclusion of the patron in the list of those likely to have been in touch. 2. We would welcome some consideration of what might happen if the bishop fails to give notice as required. 3. We would welcome the replacement of the phrase 'as soon as practicable' at every point. In our experience this is an elastic term that can be used as a justification for delay. 'Within seven days' or similar would ensure that the intention is met. 4. We understand that it is intended that the 'start date' might be before the vacancy date. If that is correct it might be helpful if that were made even more explicit in the order and guidance.
Bishop of Willesden Pete Broadbent	support. Will ensure clarity about process.

Archdeacon of Berkshire	<p>Normally, yes. However there are sometimes good reasons why a delay is advisable, which have nothing to do with pastoral reorganisation. An example of this would be where a very long incumbency has left a parish needing considerable work with the Parish Development Adviser (or equivalent) in order to be able to imagine their future and produce a parish profile which is sufficiently attractive and thought-through to be able to advertise with confidence. Triggering the statutory timetable for the appointment does not leave time for this, and nor can the work be commenced with the previous incumbent still in place.</p> <p>However, if the 6 month general time limit outlined in the second proposal came into effect, this objection would fall.</p>
Nathan Whitehead, Pastoral Secretary, Chelmsford	<p>There does need to be an understanding that it is sometimes not possible to have any meaningful discussion over suspension of the right of presentation of the benefice until it has become vacant. Our aim is to have fully developed Deanery plans which would mean that every parish knows the proposed future plan for the benefices they are in, but we are some way off that at present. The proposal does seem to allow some time for such conversations to take place in order to discern whether there are grounds for suspension, but I don't know that this will be sufficient in every case, particularly where there are substantial pastoral issues.</p>
The Revd Paul Benfield Diocesan Registrar of Blackburn	<p>26. Yes. 27. Not necessarily.</p> <p>Under section 7 (1)) the bishop is already under a duty to give notice 'as soon as practicable' to the designated officer that the benefice has become vacant by reason of the death of the incumbent. In fact, for pastoral reasons, bishops may choose to delay the giving of the notice – if the death has been unexpected it would be pastorally insensitive for the process to start and the PCC secretary to receive vacancy papers before the funeral has even taken place. And if there is a surviving spouse or partner it may be insensitive for them to hear of the process starting very quickly. Yet, technically, these pastoral reasons do not amount to a reason for delaying the giving of the notice 'as soon as practicable'</p> <p>Would it be better to require the bishop to give notice 'within three months' of the date of the benefice becoming vacant by reason of the death of the incumbent?</p> <p>Under section 7(2) 'where the bishop is aware that a benefice is shortly to become vacant by reason of resignation or cession, the bishop shall give such notice of that fact as he considers reasonable in all the circumstances to the designated officer of the diocese.'</p> <p>So the bishop is already under a duty to give notice <u>before</u> the vacancy occurs, yet many fail to do so until long after the vacancy has occurred. Why should we expect bishops to be any more compliant with the new proposal?</p>
Dean and Chapter at Bristol	Content
Simon and Sharon McKie	26 – yes, 27 – no

<p>Andy Sharp, Lay Co-chair of the PCC of St Stephen with St Julian, St Albans (personal feedback)</p>	<p>26 – yes, strongly agree 27 – yes, but would prefer the process to start before the incumbent has left – when they hand in their notice rather than at the end of the notice period.</p>
<p>Archdeacons of Ludlow and Hereford</p>	<p>26. Only up to a point. The underlying assumption appears to be that a vacancy is invariably a time of decline rather than of growth. Our observations are that this is far from always the case, and that the reverse can equally be true. In a diocese such as Hereford, where rural multi parish benefices are the norm, a vacancy is often a time when parishes really start to pull together, and in doing so, discover talents for lay leadership, mission and cooperation. Not only can this open all sorts of doors which were previously closed, but it can also significantly alter parishioners’ ideas of what they are looking for in an incumbent. We are therefore just as anxious about the idea of starting the process too soon as about the idea of leaving a vacancy running for too long. The key, in our view, is for the legal process to allow sufficient flexibility to allow for differing local circumstances.</p> <p>27. Yes, but this is not our primary concern – see 1 above. We are glad to see that it will be within the discretion of the Bishop to delay the start date for three months to allow a “breathing space”. We would also, however, like to see an option of the Bishop to pause proceedings after the start date, especially in the event of a failure to appoint (see comments under proposal 3 below).</p>
<p>Andrew Bell, Church warden and Synod Member, Oxford</p>	<p>26. Yes. Commencing earlier should mean that the vacancy could be filled earlier. Data show that attendance typically decreases during a vacancy, and more in longer vacancies. A vacancy inevitably places extra strain on those remaining in leadership – which may well be a cause of the declining numbers. So anything that can shorten a vacancy must be good. In my view starting earlier than is currently normal is the main improvement that should be made.</p> <p>27. Proposal 1 is to “encourage” early issue of the notice of vacancy. The current measure already allows for the vacancy notice to be issued before the vacancy occurs. Section 7 (2) refers to “such notice as (the bishop) considers reasonable”. In theory notice could be given immediately after the incumbent announces his or her resignation, but in my experience it never happens at that stage. So the proposal to “encourage” early issue is positive. However such action does not appear to require in legislation. How is early issue of the vacancy notice to be encouraged? The wording of para 20 of the consultation could at least be strengthened to “... notice of the vacancy <u>as soon as practicable and no later than the day ...</u>”. The wording in parentheses at the end of this paragraph provides a reminder that this is possible, but why should it not be normal? As outlined in para 25 of the consultation document the bishop has powers available should there be special circumstances making it advisable to delay starting the formal process for a particular benefice.</p>

	<p>In our case the vacancy notice was issued, as had been promised, on the first day of the vacancy. I think it should be encouraged (but not required) that the process could begin much earlier, so that section 11 and 12 meetings could (but would not have to) occur before the vacancy is effective. This would genuinely avoid “delay in commencement of the process”. In most other walks of life, steps towards recruitment of a successor would normally begin when, or even before, the post-holder announces his or her departure.</p>
James Hall, Solicitor and Diocesan Registrar	<p>26 yes 27 it improves things. Should there be a time limit for the designated officer to give notice of the vacancy after receiving notice from the Bishop? Should the start date for the statutory timetable be extended to allow completion of the consultation period following the serving of notice of intention to suspend the rights of presentation, where such notice has been served before the start date? There is little point in having to start the process if there is an intention to suspend, even if the suspension timetable has not reached the stage of the formal order from the bishop. Should the Bishop be required to give notice to the designated officer before a vacancy occurs in cases where an incumbent has given advance notice of retirement or resignation?</p>
Revd Chris Leslie. member of the Oxford Diocesan Board of Patronage for 18 years, 12 as Chairman	<p>26 Broadly speaking I agree with this proposal, particularly with the inclusion of the word ‘normally’. There are occasions where it is in the better interests of a benefice to have a longer period of time to consider where they should be going in the future. On occasions this is not immediately obvious! I have some slight concerns over the suggestion in §20 that the process could start before the departure of the previous incumbent. I have seen too many cases where a departing incumbent wishes to influence the selection of his or her successor, often by helping to frame the Parish Profile. This proposal should be treated cautiously and could be dealt with by a note to the effect that departing incumbents <i>must</i> be excluded from the preparation of the Parish Profile. 27 This seems a suitable mechanism if amended to note the concerns above</p>
Stephen Dawson Deputy Diocesan Secretary, Diocese of Salisbury	<p>After conducting wide consultation across the Diocese the responses received indicate broad agreement with the thrust of the reform proposals presented</p>
Forward in Faith	<p>Yes In the case of resignation or retirement when the usual notice period has been given, the obligation to serve the notice of vacancy on the first day of vacancy at the latest would appear ideal. However, avoidance of unnecessary delay can only be guaranteed when the straightforward appointment of an incumbent is envisaged. <i>a) Where the vacancy is caused by either the death of the incumbent or any sudden removal due to unforeseen circumstance, some delay is inevitable and it is difficult to see how it can be avoided. Clearly the phrase ‘as soon as practicable’ in paragraph allows for pastoral care for any bereaved or suffering</i></p>

	<p><i>family members, as does the possibility of a ‘start date’ not later than 3 months after the date of the vacancy in cases where the bishop has so directed (paragraph 23). This latter provision would, in essence, increase the patron’s statutory limitation period accordingly.</i></p> <p><i>b) However, In these situations there may be unusual but valid pastoral reasons for allowing bereaved or suffering family members to remain in a parsonage for slightly longer than 3 months. It would be highly unfortunate if either the parish were to suffer or the patron penalised through a reduced and consequently hurried vacancy period, or the bereaved family were callously removed or made to feel superfluous.</i></p> <p><i>c) By definition, this mechanism is valid only for the straightforward appointment of an incumbent under the terms of the Patronage (Benefices) Measure 1986. In any parish where presentation is either suspended or restricted, there is nothing in this paper which shortens delay and the vacancy will be indeterminate. Suspension or restriction frequently appear to be applied unnecessarily through questionable motives without any pastoral scheme planned or intended. Considering the apparently high number of parishes where presentation is suspended, even temporarily, it could be useful to ascertain the proportion of vacancies remaining, at a given point in time, in which the Patronage (Benefices) Measure 1986 is still applicable.</i></p> <p><i>d) On the other hand, judicious application by the bishop of a restriction could be encouraged for exceptional pastoral reasons after the death or sudden resignation of an incumbent. Removing such restriction when pastorally appropriate would trigger a ‘start date’ whilst preventing the potentially insensitive 3-month ‘guillotine’ being imposed. This would, in turn, ensure a complete 12-month period appointment process for a patron before lapse occurs.</i></p> <p><i>e) Even with a smooth-running appointment process, it should be remembered that unforeseen delays can and do occur because of necessities such as renovation work to or purchase of a parsonage house.</i></p> <p><i>f) Finally, it should not be forgotten that it is not uncommon for an incumbent to be incapacitated by a long-term illness which ultimately leads to his/her resignation. In such cases, whilst technically not in vacancy, the parish is in essence without a serving incumbent and may experience the effects of vacancy for far longer than 12 months. It is difficult to see how any change of process could improve such situations.</i></p>
<p>Teresa Sutton Lecturer in Law, University of Sussex</p>	<p>Para 26: Yes. It is clearly in everyone’s interests that significant delays in the commencement of the process should be avoided. Parishioners appear particularly concerned at the start of a vacancy and avoidance of delay in starting the process is reassuring. Whilst some benefices may grow in new ways during a vacancy, the overall time taken is often perceived as unsatisfactory. For example, the DSM from St. Alban’s Diocesan Synod from June 2018 turns on the ‘disruption’ caused by vacancy, the need to reduce delay and the need for co-operation from all parties involved in the process.</p> <p>Para 27 Yes, the new mechanism will be an improvement. Linking it to para 68 the guidance given in these instances is as key as the timetable itself. Clarity over the roles of the bishop, patron and PCC and communication of this to the parish will also avoid delay and confusion. Some of the delay referred to in para 15 is due to lack of clarity over roles.</p>

Paul Stringer, Governance Support Manager, Durham DBF	In as far the proposed changes go, I am supportive of all of them. While I understand that the Archbishops' Council has limited authority to make changes, as a long serving diocesan administrator I must say that the P(B)M 1986 is the most cumbersome piece of ecclesiastical legislation that I have used over the last nearly 30 years. That being the case, I can only suggest that this legislation is riper than ripe for radical reform. In fact, I suspect that the demanding nature of the requirements mean that some/many dioceses "sit lightly" to the legislation.
Richard Bromley, Intercontinental Church Society	Yes to both
Society for the Maintenance of the Faith	Happy to endorse all of the proposals made in the consultation paper
Archdeacons of Winchester and Bournemouth	Supportive of these eminently sensible proposals
Bishop of Selby	Happy with the proposals set out in the Consultation on Patronage (Benefices) Measure 1986
Ashley Wilson Patronage Secretary St Chad's College	Happy to support these proposals and answer yes to all your questions.
Helen Dimmock, Crown & Lord Chancellor	26. Yes: I agree that delays in the commencement of the process for filling a vacancy should normally be avoided. My feedback from working with Parish Representatives is that they find the delays built into the current process frustrating and unnecessary. They do not understand why the process of drafting the Parish Profile cannot begin once the current incumbent has announced that they are leaving. Whilst I can see that there are difficulties in drawing up a person specification for the next postholder which may appear to suggest weaknesses in the last whilst they are still present, pulling together demographic and community information should not be controversial and could enable the meeting at which the Profile has to be agreed to be held relatively soon after the official vacancy date. It should also be noted that person specifications for senior appointments are often drawn together whilst the postholder is still in place without any adverse impact. 27. Yes: the process outlined at paragraphs 20 to 23 seems a sensible approach. I would however ask that at paragraph 21 the designated officer should also give notice of the vacancy to all patrons (even if it is not their turn to appoint) as well as the PCC Secretary to avoid the situation where we find out via an announcement in the Church Times that one of our livings is vacant. Even if it is not our turn to appoint it is useful to be up to date with the situation in the benefices where we have patronage interests.
Shirley-Ann Williams, Exeter DBP	Yes. If the bishop/archdeacons have not been in touch surely the parish must have been aware of the impending vacancy. The could be where the Rural Dean and Lay Chair could be consulted as to the best way to proceed with starting the Parish Statement etc
Dr Hands, Winchester College	Satisfied with what is proposed

Gloucester DMP	Happy with proposals
Malcolm Halliday, Lay Synod Member, Leeds	Points 26 and 27. I agree with this and this point needs to be emphasised to Diocesan Bishops and to DBFs who might be delaying the start for other (sometimes diocesan financial) reasons
Diocese of Liverpool	<p>The following feedback was prepared together with the four Archdeacons in the diocese (Ven. Pete Spiers, Ven. Jennifer McKenzie, Ven. Roger Preece and Ven. Mike McGurk), the Secretary of the Mission & Pastoral Committee (Mrs Sandra Holmes) and the Diocesan Appointments Secretary (Mr Warren Hartley).</p> <p>26. Yes, normally. But we see an increasing number of special cases, either (i) where a delay would be welcomed by all concerned or (ii) where particular circumstances mean it is wise to move more much more quickly than the norm. The decision to delay is normally dealt with (as in [25]) by suspension on grounds of pastoral reorganisation, but it might be wise to have a process for a negotiated delay in some cases which did not necessarily imply reorganisation.</p> <p>27. Yes, the mechanism is suitable. But the new terminology of "start date" introduces an additional complexity. We had to work out very carefully what the implications for timing would be, and are concerned that two dates "start date" and "date of vacancy" could be confusing.</p>
Sue de Candole, Registrar Salisbury & Winchester	Yes to both
Diocese of Leeds	We agree that any significant delay in commencing the process to fill a vacancy should normally be avoided. We consider that the mechanism set out in proposal 1 does provide a suitable means of avoiding unnecessary delay in starting the vacancy process.
Gabrielle Higgins, Diocesan Secretary, Chichester	<p>26. In principle we agree that significant delay should normally be avoided. However, we are aware that other dioceses have been in the habit of artificially extended vacancies for budgetary reasons, and we hope the Committee will consider the financial implications, and whether there might be unintended consequences such as a reduction in posts which might not otherwise be necessary.</p> <p>27. The mechanism seem suitable, provided the statutory three months' notice of resignation or retirement is given. In practice we have had a number of instances where the Bishop has waived this requirement, notably in cases of ill health retirement. This could cause difficulties with the requirement to give notice no later than the day on which the benefice becomes vacant. We would suggest changing this requirement to 'not later than the day on which the benefice becomes vacant or, if later, the day three months from the date of notification of resignation or retirement, or death of an incumbent dying in office, provided that notice shall in any event be given no later than two months from the day on which the benefice becomes vacant. Given the provision in paragraph 23 to defer the start date, this should not have an adverse effect on timing. In addition, we would request clarification on the position for other forms of termination, such as expiry of a fixed term or removal from office following disciplinary or capability procedures.</p>

	Conversely, in cases where long notice is given, would it be possible to permit the Bishop to nominate a start date earlier than the date of the vacancy, to allow the necessary meetings to be held before the vacancy even commences? There is already provision for the incumbent not to attend.
Chris Gill, Lay Chair of Deanery Synod	26 I agree that unnecessary delay should be avoided, are we clear about how that delay is actually caused? 27. Whether the delay will be avoided by Proposal 1 is unclear unless the reason for the delay is clear. Is it really the part the bishops play, or is it because of the need to consider whether the post should be filled in the same way (which is really the wider Church, not just Bishops). Often plans are thought about in advance of a vacancy, but sometimes nothing happens until there is a vacancy, particularly if it is unexpected. Is this a problem with the Mission and Pastoral Measure or the Patronage measure. Would it be reasonable to ask "the Bishop" to consider the need for any Pastoral changes in the time between an announcement of departure and the actual date of departure, so that in the week after departure the Bishop is able to announce whether the post is to be filled or not, with a requirement to declare the options to be explored if the latter?
Diocese of Canterbury	It is our view that the suggested changes to the PBM and the work programme of the LRC are ones we support.
Andrew Robinson, Diocesan Secretary Winchester	I can confirm that we are broadly happy with the proposed amendments to the Patronage (Benefices) Measure 1986.
Oliver Home Diocesan Secretary, Bristol	I am writing as Diocesan Secretary, Secretary to the DMPC and on behalf of the Bishops and Archdeacons of the Diocese of Bristol in response to this consultation. 26. Yes. 27. Yes.
Anthony Jennings, on behalf of the English Clergy Association, the Patrons Group, and Save Our Parsonages	we very much agree with most of what is in the document and consider it a good attempt to improve the process for the appointment of a new incumbent.
Hilary Tyler, the Diocesan Registrar, Portsmouth	The most frequent reason for delay in giving instructions for issue of the vacancy notice is to allow the parish some breathing space after the departure of the previous Incumbent before embarking on the process of filling the vacancy. Therefore if the change is being made a long stop date of six months might allow greater flexibility bearing in mind the strict requirement for immediate notification of the vacancy in two of the three events which trigger this. What has caused practical problems is the parish and Archdeacons agreeing to start the process before the vacancy notice is issued and then holding meetings to appoint representatives too early, so that another meeting has to be held after the vacancy notice is issued to remedy the situation. This is probably less likely to occur if the proposed change is made including the requirement for early issue of the notice, but as the current requirement is to proceed as soon as

	reasonably practicable I am not entirely convinced that the change is necessary as the delays which occur currently are usually for good reasons.
Frances Godden Deputy Diocesan Secretary, DAC and Pastoral Secretary Diocese of Ely	<p>Yes delay should be avoided, all things being equal. However there is a difference between simple inefficiency and a deliberate delay on the part of the bishops or their officers in triggering the start of the statutory process for pastoral or financial reasons.</p> <p>27. We are not convinced that the mechanism proposed would always work – again, this would be dependent on the reasons for the delay. Whilst the proposal in itself sounds reasonable, the ability to start proceedings remains with the bishop, and the risk of further delay would remain if the Designated Officer were unable to respond in an efficient and timely way. Sometimes this is contingent on what is happening ‘on the ground’ such as conversations being had locally and with the Archdeacon about pastoral reorganisation or possible appointments, as well as issues of capacity and engagement.</p>
Darren Oliver Registrar and Sara Leader Registry Patronage Manager, Diocese of Oxford	<p>It is fairly common for bishops, archdeacons, or parish development advisers (PDAs) to begin the process with an email notification rather than sending Form 30 to us. This is because we have been involved in obtaining Deeds of Resignation from incumbents so know when the benefice will become vacant, or we have received a Movement Form (a notification about clergy movements for the diocese) which will similarly alert us to any forthcoming vacancies. After a number of issues which arose when PCC secretaries had not been able to convene meetings within the requisite timetable, or it was proving increasingly difficult to find a convenient date for a section 12 meeting which the patrons, bishops and others could attend, there has been a rethink locally about how to help parishes during vacancies. The process is not something PCCs have to deal with often and can be quite daunting because of the exacting deadlines.</p> <p>Therefore, to ensure meeting dates do fall within the required timetable, our bishops, archdeacons or PDAs liaise with parishes and patrons to put a timetable in place before we are asked to issue vacancy notices. This means the timetable works in a much more efficient manner and is not prone to stalling or failing. This proves very helpful but we do still have to monitor the timetable to ensure section 11 and section 12 meetings fall within the tight strict requirements.</p> <p>The proposed three month postponement of the start date could be helpful in irregular cases or to avoid holiday periods or Christmas but we would not expect this to be frequently used.</p> <p>The current vacancy notice already states the vacancy date and contains information about PCCs' powers and duties. We also provide an additional note to accompany the papers which complements the statutory information and provides ideas to consider for drafting their parish profile. Therefore, in relation to including a start date, what form will the new direction take? Is there likely to be a new form or an amendment to current forms?</p> <p>Whatever mechanisms are put in place, our experience is that the system relies on good communication between diocesan officials and PCCs, and an ability to be clear and manage expectations.</p> <p>26 Yes, but this is not normally an issue because the bishops and archdeacons have usually considered the circumstances in advance of the vacancy arising.</p> <p>27 In practice, we already do a lot of what you are proposing.</p>
Oxford Diocesan Mission and	It was universally agreed that significant delay should be avoided whenever possible in normal circumstances.

<p>Pastoral Committee and the four Archdeaconry Mission and Pastoral Committees of Berkshire, Buckingham, Dorchester and Oxford.</p>	<ul style="list-style-type: none"> • Data indicates that attendance typically decreases during a vacancy; a trend which is further increased during periods of a prolonged vacancy. To avoid unnecessary delay with future appointments, is therefore key. • The provision set out in proposal 1 (20) to allow advance planning where possible and appropriate was considered to be particularly helpful. <p>(27) • There was overall agreement that the mechanisms set out in proposal 1 do provide a suitable means of avoiding unnecessary delay, especially with regard to complex situations.</p> <ul style="list-style-type: none"> • However it was also noted that the provisions of the current Measure within the Oxford Diocese mostly work well and result in manageable and timely appointments being made. • Some members felt that the wording of the formal Notice of Vacancy could give rise to confusion at PCC level regarding the anticipated length of a vacancy and that the inclusion of a timetable in diagram form would be beneficial. • Concern was noted that should proposed changes come into operation, sensitivity towards the outgoing incumbent in cases of retirement/ resignation should be maintained. <p>In practice it was felt that delays most often occurred through a poor communication with/ understanding by stakeholders of the existing process. It was suggested that this could be addressed through clearer guidance, using accessible language and without changes to the legislation.</p> <p>The proposal to “encourage” early issue is positive, however it was also noted that section 7(2) of the existing Patronage (Benefices) Measure 1986 already allows provision for the Bishop to give advance notice (“such notice as he considers reasonable”) to the designated officer if he becomes aware that a benefice will shortly be vacant (resignation/ cession). This this could occur theoretically immediately after the incumbent announces his/ her resignation, but in practice this never/ rarely happens. How then can this be encouraged?</p>
<p>Chapter of Durham Cathedral</p>	<p>The Chapter discussed the consultation document at its meeting on 15 January and were supportive of the proposals, which they felt were welcome and suitable.</p>
<p>Bishop of Leicester and the Bishop’s Leadership Team</p>	<p>26. This is a loaded question which is inappropriate for a consultation of this kind. The way the question is put makes it difficult to say no. Of course we want vacancies to be filled promptly so that parish ministry flourishes. In reality, filling a vacancy can be a lengthy process for various reasons. Putting together a parish profile is, for instance, quite an arduous task. It’s quite unusual to be able to sort it all out in one meeting. There is also the question of finance. If a parish is stubbornly and unreasonably refusing to contribute to diocesan funds, then why should the diocese be forced to put in a priest? A proliferation of situations like this across a diocese could result in severe financial difficulty.</p> <p>If the question is reworded as ‘Do you want a law that will make you follow the appointments process quickly?’ then it is much easier to see why people would answer no. We want to fill vacancies promptly. We don’t want a law that constrains us to do so where there are good reasons not to.</p> <p>27 Up to a point. The proposals are still pretty timid and rulebound.</p>

	<p>If we must have a system of formal notification, then it should be possible to do this without having a whole series of bureaucratic forms for notice to be given. We propose that it is unnecessary for the bishop to have to 'give notice' to the designated officer, who will almost certainly be in the diocesan office. Surely it is sufficient for the bishop to 'tell' the diocesan officer, who will almost certainly know by other means anyway.</p> <p>Beyond that, we propose that all forms for giving notice should be replaced by an email (or letter where no email address is available) which contains basic information.</p>
<p>Guildford Cathedral</p>	<p>The documents have been considered at Guildford Cathedral and there is no comment from here</p>
<p>Nadine Waldron, Diocesan Registrar, Derby</p>	<p>From the perspective of the parish, delay should be avoided but the Diocese needs to take budgetary considerations in to account. Derby is not a wealthy diocese and part of our budgeting strategy can sometimes be to hold back on filling vacancies immediately. This also gives time to consider the wider context and to discern what type of priest is wanted. The time limit you suggest might well lead to more parishes having presentation suspended, in order to circumvent the timescales.</p> <p>27: The proposals would avoid delay, though I would challenge the use of the word 'unnecessary'.</p>
<p>Clive Scowen, Lay Synod member</p>	<p>Yes.</p> <p>27. It will not doubt be helpful, but there is more that can be done. (1) Why does the designated officer need to be involved? Would it not be quicker and simpler for the bishop to give the notices directly to the PCC and the patrons(s)? (2) There should be a presumption in favour of the bishop notifying the designated officer (or, better, giving the notices directly) within a fixed period of receiving the incumbent's notice of resignation, so that the bishop would be obliged to give notice within that period unless for good reason relating to the pastoral needs of the parish he or she deemed it necessary to delay giving notice until the day on which the benefice becomes vacant.</p> <p>I do not understand why it is thought appropriate to enable the bishop to delay the start date by 3 months. Paragraph 25 makes clear that if the bishop considers that there are special reasons in relation to a particular benefice, in the light of which a delay in starting the formal process would be advisable, he or she should exercise the powers under sections 85 or 87 of the Mission and Pastoral Measure 2011. If those powers are exercised they automatically delay the start date, so what need is there for a separate power to delay the start date by 3 months? If the section 85 or 87 powers are not exercised, a delay would have no legitimate purpose.</p>
<p>Lichfield Board of Patronage</p>	<p>In general we support the proposed changes as they should have the desired effect of simplifying and streamlining the process and provide more realistic time frames to enable the various parties to complete their tasks.</p>
<p>Reformation Church Trust</p>	<p>26. No comment</p> <p>27. We do not understand why the patron has been omitted in paragraph 21. It should be a requirement that the patron be informed as soon as practicable.</p>
<p>Sheffield Church Burgesses Trust</p>	<p>1. The Burgesses were comforted by the comments in paragraph 9 to the effect that there were no proposals being put forward to change the substantive rights of Patrons, Parochial Church Councils or Bishops.</p> <p>2. With regard to Proposal 1 : Insofar as there is a problem with delay in some Dioceses then if paragraph 21 were in place, as well as the designated officer</p>

	being required to give notice of the vacancy to the PCC secretary, such notice should be given within the same timescale to the Patron.
Christopher Whitmey, PCC member Hereford	<p>26 Yes, definitely.</p> <p>27. No. It should be: "The bishop would be required to give notice of the vacancy to the designated officer <u>not later than one month after a notice of resignation or retirement is received</u> ; or as soon as practicable in the case of an incumbent dying in office.". As pointed out the measure has always permitted a notice to be given while a person is in post. Reasons for request:</p> <ol style="list-style-type: none"> 1. Gives parity with the situation when a bishop resigns or retires. 2. With multi-parish rural benefices as shorter vacancy as possible is required to ensure continuing pastoral care and spiritual life in the benefice without causing demands on already stretched deanery clergy. 3. In such a benefice it is wrong to claim that a vacancy somehow strengthens the corporate life of a parish. 4. If 'as soon as practicable ... dying in office.' then what is the reasonable justification for delay when the living leave?
Jenny Hollingsworth on behalf of Bishop's Senior Staff, Portsmouth	<p>Clause 18: Seems to remove a Bishop's control as to when the process is triggered. Why is this necessary? For some dioceses there will be financial reasons to delay appointment. In some situations you may want to fill vacancies quickly (and in others more slowly. If a Bishop refused to start the process - surely there is some other process under CDM for refusing to fulfil duties of office?</p> <p>Clause 20: Section 7(1) allows for when there has been a death in office for the Bishop to as soon as practicable after he becomes aware of the vacancy, give notice of that fact to the designated officer of the diocese.</p> <p>Surely death is not the only issue that may require a Bishop's discretion?</p> <p>Clause 25: How would putting all these checks and balances on a Bishop's performance actually speed up the process? When there are 'special reasons' for delaying the process, it is not normal that they can be shared with bodies such as the Diocesan Mission and Pastoral Committee!</p> <p>Clause 26: Think it should be the Bishop's decision - we are an episcopal church...</p> <p>Clause 27: Think it could cause more delay, Mission and Pastoral Committee only meets six times per year.</p>
Ian Blaney, Lincoln Diocesan Registrar	<p>26Yes.</p> <p>27. It seems so</p>
Clare Spooner Diocesan Pastoral Officer Lichfield	Having read through the background information and the various proposals I would confirm that the suggestions seem very well thought out to assist a more efficient and smoother running of the vacancy process both at a Parish and Diocesan level.
Diocese of St Albans	We welcome the opportunity afforded by this consultation to comment on the proposals to update the provisions of the Patronage (Benefices) Measure to meet current practice. This response is made after consultation with the Diocesan Secretary (who is the Designated Officer); the Diocesan Registrar; the Archdeacons; the Pastoral Secretary and the Pastoral Officer (who deals with casework under the provisions of the Measure).

	<p>Proposal 1 [undue delay in commencing the process] paras 16-25 and questions</p> <p>Q26 – Yes, we agree that significant delay in the commencement of the process should normally be avoided. Delay is sometimes necessary e.g. to discern the right way forward where there have been pastoral issues or where the future viability of the benefice is in question. In addition, we do occasionally have cases where incumbents vacate at very short notice (other than due to death!). In one recent example due to a settlement agreement, the resignation was almost instantaneous (maybe 48hrs). In those cases, an obligation that the Form 30 <i>must</i> go out by the date of the vacancy, at the latest, might be near-impossible. Some minor leeway, even if (say) 14 days, would seem more appropriate.</p> <p>Q27 We have not experienced any <i>unnecessary</i> delay – but see comments below.</p> <p><i>Comments</i></p> <ol style="list-style-type: none"> 1. Our process has been to time the issue of the Notice of Vacancy (form 31) to fit in with the date of an informal vacancy meeting at which the process can be explained and to allow the PCC as much time as possible after that. This timing may not be needed if the PCC has a longer window in which to hold its S11 meeting and take the necessary decisions and actions. 2. How, in practice, will the proposal for the DMPC to issue the Notice of Vacancy “as soon as practicable” after the Bishop has given notice (not later than the actual date of the vacancy in most cases) fit in with the other decision-making processes in the DMPC? For example, the DMPC will normally consider forthcoming vacancies, in order to decide if there are grounds to recommend suspension of presentation under the <i>Mission & Pastoral Measure 2011, S 85</i> or to consider any proposal for an Interim Post under <i>Regulation 29 (i) (j) of the Ecclesiastical Offices (Terms of Service) Regulations 2009, as amended</i>.
George Colville Diocesan Secretary – Diocese of Chester	I largely welcome the proposals for simplifying the Patronage (Benefices) Measure 1986, but I think I would have gone further
Duchy of Cornwall	Provided the measures in their final form do not place any additional responsibility or burden on us, which you confirmed was the case I’m happy to accept the proposals, which I understand are [in summary] designed to speed up the process of appointments and take advantage of technology changes since 1986.
Chapter of York	<p>Yes – receiving prompt, early, notification that a vacancy has arisen will be helpful to all of the parties who will wish to be involved in the appointment process that will follow.</p> <p>[27]Whilst the proposed mechanism offers some measurable improvement on the current process, the potential for delay might be reduced still further if the Bishop issues the appropriate communication at the outset simultaneously to the Designated Officer and to the PCC. With the updated best practice guidance discussed above in place and readily available (perhaps as an on-line resource via diocesan websites), a single carefully worded composite communication</p>

	from the Bishop could potentially fulfil all of the procedural functions itemised in the sequence set out in paragraphs [20] to [23] above.
Bob Ball, Holy Trinity Church PCC, Southport	Yes, 27: We think the Bishop's notice of a vacancy in the case of resignation or retirement should be mandatory at the point that he / she becomes aware of the impending vacancy. The Bishop can always halt procedure at a later stage
David Lamming, Lay Synod Member	<p>I agree that significant delay in the commencement of the process for filling a vacancy should normally be avoided.</p> <p>13. I note the paragraph in the CP (para 25) stating that if there are “special reasons in relation to a particular benefice, in the light of which a delay in starting the formal process would be advisable”, the bishop should use his existing power under section 85 of the Mission and Pastoral Measure 2011 to suspend presentation. It is to be noted, though, that he would have to justify such action, carrying out the required statutory consultation as well as obtaining the consent of the diocesan mission and pastoral committee. These are important constraints on the exercise of the power, if properly observed.</p> <p>14. I agree with the tenor of the mechanism set out in ‘Proposal 1’ to avoid unnecessary delay, save that (as stated in my letter to the <i>Church Times</i>) I would require that in a case of resignation or retirement (resignation including where an incumbent announces that he or she has accepted an appointment to another post elsewhere), the bishop should give the section 7(2) notice to the designated officer not later than one month after he becomes aware of the impending vacancy (or of its public announcement, acknowledging that the bishop will almost certainly have been made aware shortly before that.)</p> <p>15. As for the ‘start date’, it is not apparent from the CP why the bishop should be able to postpone the start date to a date “not later than 3 months after the start of the vacancy.” In the case of the current vacancy in our benefice, this could have allowed the bishop to postpone the start date to 17 December 2018.</p> <p>16. If it is thought necessary or desirable to give the bishop such a power to postpone the start date, the LRO should state that he should only be able to do so ‘for good reason’ and (perhaps) that such postponement must have the consent of the diocesan mission and pastoral committee.</p>
Perry Chadwyck-Healey, Salisbury DBP	I am in complete agreement with the overall intention of this reform and agree with all the suggestions
Salisbury Board of Patronage	Further to an earlier e mail to you, I can confirm that the Salisbury Diocesan Board of Patronage met last week and discussed the proposed changes outlined in the consultation paper circulated in November 2018. The Board were entirely in agreement with the proposed changes and have asked me to let you know that they are supportive of any changes which would simplify matters. They had no specific additional comments to make.
Anne Stunt, Secretary to Board of Patronage Portsmouth Diocese	<p>Yes to questions 26 and 27</p> <p>The Board would like to suggest for there to be a maximum time for the designated officer, i.e. within 7 days, to give notice to the PCC Secretary after receiving the notice from the Bishop. (Point 21).</p>

Proposal 2

32. It is accordingly proposed that the parts of the procedure for which the PCC is responsible (outlined in paragraph 14(e) and (f) above) should be simplified, in particular to make it easier for PCCs and PCC secretaries to carry out the duties they have in the process for filling vacancies, on the basis that the current requirements result in an administrative inconvenience and an obstacle to efficiency.

33. It is envisaged that the existing periods of 4 weeks for section 11 meetings and 6 weeks for a section 12 meeting that follow the receipt of formal notice of the vacancy from the designated officer should be replaced with a single maximum period of 6 months beginning with the 'start date' specified in the notice given to the PCC secretary by the designated officer.

34. The following would need to take place within that 6-month period:

(a) the PCC would–

i. agree its statement describing the conditions, needs and traditions of the parish,

ii. appoint parish representatives,

iii. decide whether to request the patron to advertise the vacancy, and

iv. decide whether to request a written statement from the bishop describing the needs of the diocese and the wider interests of the church.

(b) the PCC would decide whether to request a joint meeting with the bishop (or bishop's representative) and the patron (i.e. a section 12 meeting);

(c) the bishop and/or the patron would decide whether to request a joint meeting with the PCC (i.e. a section 12 meeting);

(d) where a joint meeting was requested, it would be held on a mutually convenient date arranged by the PCC secretary.

35. The PCC and others concerned would need to complete these matters by the end of the period of 6 months beginning with the 'start date'. This is intended to provide adequate time for the PCC to carry out its duties and for arrangements to be made for the holding of a joint meeting with the bishop and patron where that is requested.

36. The preparation of the PCC's statement describing the needs, conditions and traditions of the parish will usually require consultation with various people, both PCC members and others in the wider parish, and needs careful thought and preparation. Although formally agreeing the statement would need to take place at formal meeting of the PCC held within the six-month period following the 'start date', there would be nothing to prevent the PCC beginning the consultation and carrying out informal drafting work before that date.

37. Once all the matters set out in paragraph 34 have been completed, the patron, bishop and parish representatives will be ready to undertake their respective roles in the task of identifying a priest for appointment to the benefice.

38. It should, in most cases, be possible to complete the matters set out in paragraph 34 within less than 6 months, in which case it would be possible to proceed more quickly to the task of identifying a priest for appointment. There should be no need for it to take longer than at present to get to this stage. But the current requirement to have done so within 10 weeks of the PCC receiving formal notice of a vacancy is unrealistic and six-months would seem to be a reasonable **maximum** period for the required matters to be completed.

39. If these matters were not completed by the PCC within that time, it is envisaged that the existing provisions under which the patron and bishop may proceed with the appointment once the time limit has passed would remain in place and an appointment could nevertheless be made. Those provisions are a safeguard against egregious inefficiency or obstructiveness resulting in inordinate delay.

Questions on proposal 2

40. Do you agree that the procedure for which the PCC is responsible should be simplified to make it easier for PCCs and PCC secretaries to carry out the duties they have in the process for filling vacancies?

41. Do you agree that the existing periods of 4 weeks for holding section 11 meetings and six weeks for arranging and holding a section 12 meeting are unhelpful?

42. Do you agree that a longer period should be allowed to enable the PCC to carry out its duties?

43. Do you agree with the proposed single maximum period of 6 months, beginning with the 'start date', for the PCC to hold section 11 meetings and for a section 12 meeting to be arranged and held?

Bishop of Whitby	<p>Proposal 2 is, I believe, a good one. The present timetable is often honoured in the breach. One aspect which the paper does not seem to address, though it might not have to for the sake of the text of the legislation, is that (in our experience) the PCC's Statement now customarily forms the major element of the recruitment pack, which of course is at least as much the patron's document as the PCC's once it is released publicly. In other words the PCC's Statement has evolved from a few pages on a pro-forma to an illustrated brochure, and it takes more time and work to put it together: but I believe that is usually time well spent as it really focuses the PCC's and patron's minds on what the parish's future needs are. It often happens that a s11 meeting is convened and then adjourned so that the Statement can be drafted and then approved by a subsequent meeting. That does not easily fit the legislation as it stands: the proposal would deal with this in a much better way.</p>
Archdeacon of Norfolk	<p>Q40 – Yes Q41 – Yes, which is why we currently delay the formal announcement of the vacancy until the PCC is ready Q42 – Yes Q43 – Possibly – there are times when a PCC has significant issues to work through and which do need many months before the profile can be accurate and they are in a position to appoint. So a possibility of extension to nine months at the PCCs request would be helpful. That would still allow the patron three months to make an appointment before patronage lapses</p>
Rev David Keen	<p>40. These proposals make sense. However there also needs to be a minimum period elapsing from the request from the PCC to advertise to the Diocese/patron placing the advert, except by mutual agreement with the Diocese/patron (e.g. to avoid December adverts). There also needs to be a maximum of 6 weeks between the advert and the interviews. There can be unreasonable delays at this stage in the process. I was involved in an appointment process where the paperwork from the parish was all in place, but it was a further 2 months before the advert went out, and then due to diary commitments at Diocesan level it was 3 months between the adverts being published and the date of interview. With all the parish paperwork ready in October, we were faced with a position where, due to these timescales, we wouldn't get someone in post until July the following year. This is ridiculous. 41 yes</p>

	<p>42 yes but this shouldn't be an excuse for the Diocese to draw the process out in order to save money, or because senior clergy are too busy to get to meetings</p> <p>43 yes</p>
Mike Todd, Lay Synod Member	<p>Q40 I agree</p> <p>Q41 I am of the view that there are varying circumstances and that there are times when it is helpful to move speedily and times when a longer period for reflection, to ensure getting the right person, is the better approach. As with my point on Q27, I would like to suggest that there is a norm which the DMPC could vary, again for stated and circumscribed reasons. It is also right in some contexts to ensure that people 'get a move on' and not delay unduly.</p> <p>Q42-43 However, my main suggestion in this section is to remove the optionality of the written statement from the bishop. I would like to propose that this be mandatory with a target date very soon after the date of resignation. (This would remove one step in the subsequent timetable - the PCC(s) would not have to make a decision whether to request it) In my view, any organisation should maintain a state of readiness for the resignation (or departure for other reasons) of any member of staff, especially those in key positions so this idea would encourage good forward and succession planning from the diocese. Whilst I recognise that sometimes parishes can benefit from a hiatus this is neither the norm nor should it be seen as 'a good thing', but rather a failure in longer term planning (and possibly other pastoral matters) If we were minded to take this approach to the bishop's statement I would want time to consider the proper role of the DMPC in the process - should they not only be involved but also have a responsibility for ensuring that diocesan and deanery plans are maintained such that such a statement can be produced early in the vacancy/replacement process?</p>
Archdeacon of Bodmin	Yes to all
Joint Response from the Church Patronage Trust and the Peache Trustees	<p>We agree whole-heartedly with the proposals contained in Questions 40,41, and 42. However, we do not agree with the proposed single maximum period of 6 months for the PCC to cover the work of Sections 11 and 12. Our experience tells us that within the overall 12 month period allowed from 'Start Date' to 'Lapse', more than 6 months is often required to cover the process after the PCC's have concluded their preparatory work.</p> <p>We recommend the balance should be (in region of) 4 months for the initial PCC Section meetings and business, allowing 8 months for the remainder of the process.</p>
Karen Hall, Pastoral Secretary, Norwich	Yes
Angus Deas, Pastoral and Closed Churches Officer, Diocese of York	<p>Proposal 2.</p> <p>Q40. Yes</p> <p>Q41. Yes</p> <p>Q42. Yes</p> <p>Q43. Yes. In my experience, the six month period, following possibly a 3 month 'delay' to the 'start date', will be more than enough for the majority of PCCs to agree and respond. The biggest issue usually is the preparation of the Parish Profile, which forms a large part of the advert.</p>

Revd Dr Adrian Hough Exeter DMP Sec	Yes
Ken Gumbley, Chairman, Legislative Committee, Sodor & Man Diocesan Synod	Yes, to all the above.
Niall Blackie Joint Registrar Diocese of Lichfield	<p>actually this is one reason why notices of vacancy are not sent out immediately on a vacancy occurring! So the proposal is especially welcome</p> <p>Questions</p> <p>40: yes</p> <p>41: yes</p> <p>42: yes</p> <p>43: No. I would suggest that the period be split, allowing 4 months for s11 and 2 months for s12 procedures. The split would mean that a PCC could not leave matters until the tail end of the period and then expect others to fall into line.</p>
Roland Callaby Diocesan Registrar, Bath & Wells and Bristol Dioceses.	Yes
Simon Baynes, Synod Member St Albans	<p>Paragraph 40: Yes, the procedures for which the PCC are responsible should be simplified.</p> <p>The needs of the PCC's and PCC secretaries should be at the forefront in any reform to the Patronage (Benefices) Measure 1986. Making the lives easier for all the volunteers who serve on PCC's and the PCC secretary should be paramount. This can be done without reducing the integrity of the process but the process will need to be brought into the 21st century.</p> <p>Paragraph 41: Yes, the procedures should be simplified but the suggested mechanisms and timeframes are unrealistically long in these times of modern technology. It is recognised that it can take time to organise meetings but it shouldn't take 4 weeks to hold a section 11 meeting or 6 weeks to hold a section 12 meeting.</p> <p>To stem the decline in congregations, the Church as a whole, and the Bishop and senior staff in particular, need to recognise that filling vacancies is important and must be regarded as a matter of priority; as such these tasks could and should both be completed in 2-3 weeks.</p> <p>Paragraph 42: No, PCC's are usually keen to move to fill a vacancy quickly and most PCCs simply do not need 6 months to complete their duties.</p> <p>The draft 'Statement of Needs' is something that all PCC's should keep up to date at all times, reviewing it on a formal basis annually. By carrying out annual reviews, it becomes possible that when the time comes, the PCC are not starting with a blank sheet of paper. The draft 'Statement of Needs' can be brushed up and finalised in a short period, say 2-3 weeks. It is suggested that the annual review of the draft 'Statement of Needs' is carried out without the incumbent present.</p>

	<p>The 'parish representatives' should by default be the Church Wardens. Only if a Church Warden is unable or unwilling to undertake the task should others be elected/appointed.</p> <p>'Advertising the vacancy' should be the default and the Patron should be given a limited time, say 2 weeks, to request otherwise.</p> <p>Paragraph 43: No, a period of 6 months to arrange and hold the section 11 and section 12 meetings is simply far too long. The Church needs to change its mind set and find ways to move more swiftly on this. The delays in filling vacancies is believed by many to be a reason why 'congregations in vacancy' decline — the longer the vacancy the greater the decline.</p>
Rev Katherine Price, Chaplain, Queen's College Oxford	Yes - We are in favour of reducing burdens for PCCs and PCC secretaries, but we have no direct experience on this side of the process.
Neil Parsons, Chapter Steward Norwich Cathedral	Yes
Caroline Mockford Registrar of the Province & Diocese of York for and on behalf of Lupton Fawcett LLP	<p>40. I agree that the formal procedure for PCCs should be simplified. At present, it can seem unduly bureaucratic, particularly where the PCC has had informal discussions with the bishop/archdeacon/rural dean about filling the vacancy, reached a decision and then has to hold a formal s11 meeting to make the same decision again.</p> <p>41. I agree that the 4 week/6 week staged timetable is unhelpful. It is unduly bureaucratic.</p> <p>42. I agree that a longer period to allow the PCC to carry out its duties would be helpful, particularly as the current requirements can often push the PCC to carry out its duties over a very short period, only for the PCC to have to wait months for the vacancy actually to be filled.</p> <p>43. I agree that a single period in which the PCC must carry out all aspects of its duties would be preferable to the current procedure. Six months seems reasonable.</p>
Jane Steen Archdeacon Southwark	<p>40, Yes</p> <p>41. As outlined above, I think this is manageable but you do effectively have to start the process informally and then move into formal mode after the section 11 notice.</p> <p>42. Yes – but in practice, this won't make much difference to any diocese in which the process is started informally first.</p> <p>43. Yes. And if the trigger for the process discussed in Proposal 1 were to initiate a six month period, I think the effect would simply be to bring into the formal time scale what I have described as being done informally.</p>
The Church Pastoral Aid Society (CPAS) include the Martyrs Memorial and Church of England Trust The Church Trust Fund Trust	<p>40 Yes the CPAS Patronage Trustees do agree that the process for PCCs and PCC secretaries should be simplified.</p> <p>41 Yes, the CPAS patronage Trustees agree that the present 4 week time frame is unhelpful and needs alteration.</p> <p>42 Yes, the CPAS Patronage Trustees agree that a longer period should be allowed to enable the PCC to carry out its duties. The CPAS Patronage Trustees think that the proposed maximum period of 6 months is too long. This is because such a length of time potentially and seriously erodes the time allowed to a patron</p>

The Church Pastoral Aid Society Patronage Trust.	before lapse occurs (recruitment can take a significant length of time). The trustees suggest this is altered to 3 months, which should be a long enough maximum period and request that the proposal be amended accordingly.
David Jenkins Archdeacon of Sudbury	40 very much in favour; 41 yes; the present deadlines are almost punitive! 42 yes 43 yes
The Revd J C Hugh Lee, Synod Member	Yes However, any guidelines, produced on this by the national church or any diocese, should make clear that it is normally desirable that the section 11 and 12 meetings should be held as soon as practical and that neither the diocese nor the patron(s) should delay the date of the section 12 meeting beyond the date requested by the PCC(s).
Jane, Lowdon Registrar of the Newcastle Diocese and the Carlisle Diocese	40. Certainly 41. Agreed. The four week period is rarely fully observed especially over the summer months when people are away. 42. Agreed 43. Agreed
The Venerable David Bailey Chair – Simeon’s Trustees and Hyndman’s Trustees	40 – Yes 41 – yes 42 - Yes, and it should be clear that those include completion and approval of the statement of needs/ benefice profile (see below). 43 - Yes, and it is important that ‘arranged and held’ is clearly stated. Further comment In our experience sub-section 11(1)(a) of the measure has been interpreted in very different ways in different dioceses. One of the purposes of the meeting is for ‘preparing a statement describing the conditions,...’. In our view the plain meaning of this is ‘complete and approve’ but we have seen this interpreted as ‘begin preparation’, ‘decide how to go about’, etc. Clearly, the time allowed is far too short to prepare what is now thought of as a good quality ‘parish profile’ and so some have either disregarded the legislation or interpreted it ‘creatively’. We are glad to see that more time would be available but also that it is clearly intended that the profile should be completed in time for a sec
Bishop of Willesden Pete Broadbent	support. The timescale in the measure is incredibly complicated and unintelligible.
Nathan Whitehead, Pastoral Secretary, Chelmsford	We are supportive of the proposal to simplify this process rather than having set deadlines for those particular actions to have taken place.
The Revd Paul Benfield Diocesan Registrar of Blackburn	Yes
Dean and Chapter at Bristol	Content
Simon and Sharon McKie	40 – yes 41 – yes

	<p>42 - yes, but we do not agree that the procedures suggested are appropriate. 43 – no</p>
<p>Andy Sharp, Lay Co-chair of the PCC of St Stephen with St Julian, St Albans</p>	<p>40 – yes 41 – yes 42 – only if the PCC thinks it necessary 43 – yes</p>
<p>Archdeacons of Ludlow and Hereford</p>	<p>40. Yes, we welcome this. 41. Yes. 42. Yes, we welcome this. 43. Not entirely. It would, we feel, be inevitable that many PCCs would regard the whole of that period of 6 months as being available to produce their statement of needs, leaving little or no time for patrons to play their proper part in the process if they wished to do so. It might be felt preferable to have a single period for PCCs to hold a s.11 meeting and for a separate period to allow patrons to request a s.12 meeting, if so minded. However we note that patronage bodies are being consulted and they will no doubt express their own views.</p>
<p>Andrew Bell, Church warden and Synod Member, Oxford</p>	<p>40. Yes Of course anything that can make this easier is to be encouraged. 41. For an organised PCC they are not unhelpful. It should be perfectly possible to operate within these timescales. I do not agree with the statement in paragraph 38 that “The current requirement to have done so within 10 weeks if the PCC receiving formal notice is unrealistic”. Much of the content of a section 11 meeting can be informally discussed and planned in advance. (We held the meeting one week after the vacancy notice; required notice having been given in anticipation. Prior discussions among bishop, patron and PCC meant that all parties agreed that no section 12 meeting was required.) 42. I would be content for a longer period to be allowed, as long as this is only seen as a maximum, not normal. I am not sure how that would be achieved. If it were up to me I would not allow as long as 6 months. 43. As above – I would be content with this being allowed, but hope that in most cases nothing like this long should be needed (we took one week from the vacancy date, with much of the preparatory work done before then. I accept that if the vacancy notice was issued earlier there would be less time for preparation and more than a week would be needed!). I fear that allowing 6 months would set an expectation that it should normally take that time. The idea of these proposals is to simplify and expedite the process. How about being more radical, and simplifying the procedure by removing the requirements relating to “section 12 meetings” from the measure completely? Of course, additional meetings, not defined in the measure, could be arranged when appropriate, but removing this “expectation” would help parishes to be more efficient and expedite the process.</p>
<p>James Hall, Solicitor and Diocesan Registrar</p>	<p>40 yes 41 often, yes 42 yes 43 yes Why do we need to have separate section 11 and section 12 meetings? The standard practice here is for there always to be a section 12 meeting and very often it deals with the section 11 requirements at the same time</p>

<p>Revd Chris Leslie. member of the Oxford Diocesan Board of Patronage for 18 years, 12 as Chairman</p>	<p>40 I may be missing a point here, but I fail to see what simplification is offered in §34 over that which pertains at present outlined in §14(e) and (f)</p> <p>41 The problems around the calling of the section 11 meeting (§29) can be dealt with without extending the 4 week period presently applying. The main item that takes time in that 4 weeks is the preparation of the Parish Profile (§11(1)(a) of the Measure). This could be dealt with by simply replacing the word <i>'preparing'</i> in that paragraph with <i>'initiating the preparation of...'</i>. This reflects, in my experience, what actually happens today. There seems to be good reason to keep this period as short as is reasonable.</p> <p>The calling of a section 12 meeting within 6 weeks of the section 11 meeting is a much tighter deadline, and potentially difficult to achieve with the two notice periods (10 days and 14 days) eating up almost half of that time. Part of the issue is that the calling of a section 12 meeting is optional. In my experience it has almost always taken place, and as a Board we will always ask for one. If a section 12 meeting were made mandatory, then the 6 week period may well be adequate.</p> <p>The one area that may cause problems within the 6 week restriction is the actual writing of the Parish Profile. In large complex benefices this can become a major undertaking.</p> <p>However, if one purpose of the section 12 meeting in <i>'exchang[ing] views on the statement'</i> (12(1)(b) of the Measure) is to have any meaning, it must be taken that the document in question is in draft form at that time. Again, that is the experience that I have seen. Thus this should be no problem.</p> <p>42 Considering the above, if the minor changes considered there are implemented I do not see that there is any need to extend the periods in the Measure.</p> <p>43 I am very concerned over the proposal here to allow 6 months for the section 11 and 12 meetings to take place (even if it is a maximum). While the change allowed by the Mission and Pastoral etc (Amendment) Measure 2018 allows 12 months to elapse before the right of presentation lapses, the 6 months proposed is over generous, leaving potentially only 6 months to find a candidate. Locating suitable candidates for many parishes is, today, a difficult job. Our diocese, which is often seen as an attractive diocese to serve in, quite regularly has to go through 3 rounds to find the right person. Allowing for 3 (or more) sets of readvertising, cut-off dates, shortlisting and interviews the 6 months is very quickly exhausted.</p> <p>It is vital to keep the initial preliminaries as short as possible. It is my observation that allowing a longer time will often cause the process to exhaust all that longer time. A shorter time sharpens minds!</p>
<p>Forward in Faith</p>	<p>Yes to all</p> <p>In the majority of parishes where a PCC has passed a resolution under the House of Bishops' Declaration, the diocesan bishop permits the relevant PEV some involvement in the appointment process. The extent of this involvement varies between dioceses, but in many the diocesan bishop permits the lead to be taken by the PEV in the same way as, for example, the Bishops of Burnley and Wakefield operate within their dioceses. Since paragraph 21 of the Declaration states that parishes in one part of the country are entitled to receive equivalent treatment to that provided in</p>

	another, we suggest that formal recognition to such involvement of a PEV in the appointments process is given in a Code of Practice.
Teresa Sutton Lecturer in Law, University of Sussex	Para 40: Do you agree that the procedure for which the PCC is responsible should be simplified to make it easier for PCCS and PCC secretaries to carry out the duties they have in the process for filling vacancies? Yes, the procedures should be simplified. Again communication about division of roles between the parties involved (bishop, patron, PCC) is also key, promotes co-operation and avoids variation of process. Para 41-43: Time periods. I think the current time limits are satisfactory. In para 38 the 6 months is suggested as a maximum time rather than a recommended time. The danger is that parties work to the new maximum time. Given the overall length of time already taken to fill some vacancies and the concern about this at parish level, making allowance for further delay is unhelpful.
Richard Bromley, Intercontinental Church Society	Yes to all
Helen Dimmock, Crown & Lord Chancellor	40. Yes: the procedures should be simplified as the individuals performing them are volunteers who do so infrequently. 41. Yes: the deadlines are unhelpful and lead to those involved finding ways to work round them such as not notifying vacancies until the PCC are ready and the S11 meeting has been arranged. This creates a false impression as to how long the benefice has actually been vacant. 42. Yes: although it would be useful to have the maximum period outlined as proposed, otherwise the process could drift and be longer than necessary. 43: Yes: 6 months seems like a sensible maximum .
Shirley-Ann Williams, Exeter DBP	40 As vacancies are not frequent the PCC and the Secretaries should be given adequate help in making their statement of needs and parish profile. Over the years I have seen a great improvement in many of these but there are still cases where they are not helpful and not much help has been given or suggested. It must always be stated that all documents must be a result of consultation not just of a dominant few in the parish. 41 Yes. The Patron(s) should be informed at the same time as the PCC so that if a Section 12 meeting is required there is no feeling of undue haste. 42 Some general guidance could be incorporated in the annual Archdeacon's visitation as all parishes will have to do this at some time. This could result in a simple paper sent to all parishes for guidance so a longer period would not necessarily be needed. 43 Yes a single agreed period be it 6 months or more should be the norm
Malcolm Halliday, Lay Synod Member, Leeds	I agree provide the PCC understand the need to "get on with it" otherwise they may find themselves up against the "lapse" deadline
Diocese of Liverpool	40. Yes, absolutely. 41. The inflexible requirement is unhelpful and unrealistic, although some PCCs will continue to prefer to do it this way. From a practical point of view we are very happy with the proposal. However, we would not wish the distinction between the business of the two meetings (and the different people involved) to be lost. 42. Yes, although it should be emphasised that this longer period is a maximum period, and that PCCs might wish to carry out its duties in a shorter period.

	43. Yes, as a default period. But (see general comment above) it might be a good idea to allow for a negotiated longer (or shorter) period.
Sue de Candole, Registrar Salisbury & Winchester	Yes to all
Diocese of Leeds	<p>We agree that the procedure for which the PCC is responsible should be simplified as set out in proposals 2.</p> <p>We agree that the existing constraints of 4 weeks for holding a section 11 meeting followed by 6 weeks for a section 12 meeting are unhelpful, especially with the constraints on Bishop's and Archdeacon's diaries.</p> <p>We agree that a longer, more flexible, time period should be allowed to enable the PCC to carry out its duties.</p> <p>Given the proviso in proposal 1 that the start date for the vacancy can be up to 3 months after the vacancy arose, we feel that the maximum time period after this start date should be four months.</p>
City of London Corporation	As regards Proposal 2, as the consultation envisages that in most cases it should be possible for the PCC to fulfil all the requirements in less than 6 months consideration could be given to a shorter maximum period to fulfil the requirements, with the Bishop able to agree an extension to allow for a maximum period of 6 months beginning with the start date.
Gabrielle Higgins, Diocesan Secretary	<p>40. We agree the procedure should be simplified.</p> <p>41. We agree the existing periods are unhelpful.</p> <p>42. We agree a longer period should be allowed.</p> <p>43. In principle we are content with a single maximum period but believe there should be a safeguard against a PCC producing its statement of needs after 5 and a half months, leaving the Bishop and patron insufficient time to decide whether they wish to discuss the statement at a s.12 meeting and if so for one to be arranged. We suggest that there be a requirement for the requirement in paragraph 34(a)(i) and (iv) to be completed within 4 months and those in 34(b) and (c) to be completed within 4 months 2 weeks.</p> <p>We would also question whether the penalty of losing all rights should apply for all failures. We agree it should for 34(a)(i), (ii) and (d) but surely the penalty for (a)(iii), (iv) and (b) (and indeed (c) too) should be merely to lose the right to make the request in question.</p>
Chris Gill, Lay Chair of Deanery Synod	<p>40. Yes the procedure for which the PCC is responsible should be simplified – at it presently stands the deadline for producing the Parish Profile and for electing Representatives is impossible and does not allow sufficient time for prayerful consideration</p> <p>41. Timings will always be difficult for some churches, particularly where they may have just lost the person who led them. There needs to be flexibility and a fixed end date, with the Parish potentially setting their own timetable along the way in co-operation with Patron, Archdeacon, Rural Dean and Deanery Lay Chair. We have a practice whereby the Archdeacon will lead a pre-section 11 meeting (with all those present) to advise the Parish on the way forward and we find this extremely helpful in setting the tone for the appointment. This often addresses matters that would otherwise be raised at a Section 12 meeting and opens up lines of communication to make matters easier going forward. If it is in the committee's remit I would ask it to consider, perhaps just in guidance, whether it allows Parishes to invite Rural</p>

	<p>Deans and Deanery Lay Chairs to be present at Section 11 meetings, but only to advise</p> <p>42. There is a balance, the PCC should not drag their feet without good reason. As above there should be flexibility and a fixed end date to reach the advertisement stage. The question then has to be asked though as to what happens if they don't meet that end date – do the Churchwardens then have to finalise the matter within two weeks?</p> <p>43. Probably, but see above.</p>
Oliver Home Diocesan Secretary, Bristol	Yes to all
Hilary Tyler, the Diocesan Registrar, Portsmouth	<p>The proposal to so significantly extend the time limits of four weeks and six weeks currently for holding meetings under Section 11 and Section 12 is likely to give rise to delay which the proposals are apparently trying to avoid. Allowing longer time limits tends to result in the whole process taking longer, whereas short time limits concentrate people's minds, so the proposal seems unlikely to achieve the objective of speeding up the process of making a new appointment. It is fair to say the present time limits are probably too tight particularly when a vacancy occurs during summer holidays or a particularly busy time of year so perhaps eight and twelve weeks would be sufficient by way of a change.</p>
Frances Godden Deputy Diocesan Secretary, DAC and Pastoral Secretary Diocese of Ely	<p>40 Yes we agree it should be simplified.</p> <p>41. We feel that over-prescription of time periods which are contingent on other events can be unduly restrictive and inflexible.</p> <p>42. yes, to an extent. We would be concerned that a longer period would have the opposite to the desired effect and encourage delay. Sometimes a shorter time requirement and sense of urgency can help to focus and also reassure the parish/es that its vacancy is not being overlooked or 'parked' by the diocese. However this will depend on the parish in question – there is always the risk of an adverse impact where there is less capacity at parish level.</p> <p>43. the leap from ten weeks to six months seems very large. We would not be opposed in principle however, provided the impetus for appointments and attention to the issues at stake do not get overlooked.</p>
Darren Oliver Registrar and Sara Leader Registry Patronage Manager, Diocese of Oxford	<p>As mentioned in our comments on Proposal 1, the bishops, archdeacons and PDAs contact the PCCs and patrons ahead of time to get a timetable in place so this provides plenty of time for the PCCs to issue the relevant notices about meetings. It also allows PDAs time to work with parishes or benefices on their profiles and for parishes to consider who they would like appointed as their parish representatives.</p> <p>Preparing a timetable in advance is also of great assistance for section 12 meetings because bishops and patrons have very busy diaries. Finding a date for such a meeting to take place within 6 weeks of a section 11 meeting can be impossible, especially when you also factor in attendance by PCCs so the help provided can prove invaluable.</p> <p>Before a vacancy occurs we send a letter to PCC secretaries and patrons to let them know a vacancy is imminent and the official process will not start until vacancy notices are issued by us. This means the legal process of section 11 and section 12 meetings is reinforced, but preceded by a good deal of preparatory work supporting this legal process.</p>

	<p>As you can see, Oxford is already using a streamlined and carefully coordinated process because the system proved complicated for PCCs, patrons, bishops etc for some time.</p> <p>40. Yes, but the system as operated in Oxford relieves much of that pressure.</p> <p>41. Generally speaking, yes, although PCCs in Oxford are able to manage the existing periods because of the assistance provided in establishing a timetable.</p> <p>42. In one regard it could be a good thing, however, it could elongate the process unnecessarily for particular parishes who would fail to act whatever timeframe you provide.</p> <p>43. On the whole, yes, we think it should be allowed but possibly not encouraged or required in most cases as the majority of parishes are keen to proceed with all haste. However, if left to their own devices, it is possible that parishes will take all of the time, then, as a result it will run out. They will need some support throughout the process to ensure they actually act</p>
<p>Oxford Diocesan Mission and Pastoral Committee and the four Archdeaconry Mission and Pastoral Committees of Berkshire, Buckingham, Dorchester and Oxford.</p>	<p>40 • The proposal to “encourage” early issue is positive, however it was also noted that section 7(2) of the existing Patronage (Benefices) Measure 1986 already allows provision for the Bishop to give advance notice (“such notice as he considers reasonable”) to the designated officer if he becomes aware that a benefice will shortly be vacant (resignation/ cession). This this could occur theoretically immediately after the incumbent announces his/ her resignation, but in practice this never/ rarely happens. How then can this be encouraged?</p> <p>In usual circumstances a vacancy is anticipated and some members expressed the opinion that the current provisions are sufficient for the PCC to fill the vacancy effectively within the statutory timeframe. Concern was thus raised that proposals 2 might inadvertently result in an unnecessary delay by allowing a longer timeframe to be implemented.</p> <p>Members again noted the importance of clear communication of process as being as important as the simplification of process. That describing, rather than prescribing was key to a successful appointment.</p> <p>41 Whilst our overall diocesan experience is that this split timeframe does not pose an issue for most PCCs, we acknowledge that amalgamating and extending them could be beneficial for those parishes where the vacancy is unexpected, or otherwise complicated.</p> <p>It was requested that should this amendment come into force, it would be helpful in the corresponding Code of Practice to offer a ‘best practice’ guidance which recommends a swift implementation of the process be carried out (in line with the current statutory timeframes) in usual circumstances, wherever possible, in order for a vacancy to be filled as soon as is practicable.</p> <p>Some members felt that the current time frames for holding the section 11 and 12 meetings were unhelpful due to the difficulties for PCCs in arranging quorate meetings of busy people at relatively short notice.</p> <p>It was also expressed that the overly prescriptive time frames set out for holding the section 11 and 12 meetings were indeed unhelpful.</p> <p>Some members expressed that the majority of (organised) PCCs do not struggle with these two deadlines, adding that much of the content of a section 11 meeting can be informally discussed and planned in advance of the vacancy notice.</p>

	<p>Can see the merit of this proposed simplification, but do not view the current provision as unhelpful in usual circumstances</p> <p>42 Some members welcomed a proposed longer period be given to PCCs to carry out their duties, citing that they felt this would allow them ownership of the process and sufficient time to explore all options. Other members were supportive of this proposal as a failsafe to allow complex vacancy situations sufficient time to be carefully managed. It was noted that if this change to legislation were to come into operation, it should be done in such a way as to allow the full time period to act as a maximum, but not to be recommended as the standard practice.</p> <p>43 Most people agreed that a single time frame was clear, simple and therefore more helpful. There was a mixed response in terms of the length of time that the proposed single period should extend for. Some members expressed that it would be helpful for this time frame to be extended in exceptional circumstances to 9 months. Others felt that 6 months should be the absolute maximum. Requests were given for the guidelines set out in the Code of Practice to clarify that it is usually desirable that the section 11 and 12 meetings should be held as soon as practicable.</p> <p>Several members did agree to the introduction of a single, joint time frame, but felt that 6 months was too long and would allow a single inefficient/ obstructive PCC to hold up the process for a whole benefice. There was support for restricting a proposed single time frame to the current 12 weeks (3 months), or to a 4 months at a maximum. for both elements was sufficient and to extend this might encourage unnecessary delays.</p>
<p>Bishop of Leicester and the Bishop's Leadership Team</p>	<p>40 The procedure should be as simple as is humanly possible. Any unnecessary prescriptiveness should be removed. Is it really necessary to specify (under (d)) that the PCC secretary arranges the date of the section 12 meeting. In reality the date is likely to be arranged by the Bishop's or Archdeacon's PA. Why specify something in legislation that doesn't reflect lived reality?</p> <p>41. Yes</p> <p>42 Yes</p> <p>43 It is a sensible start to a reform. However the proposals as a whole still root the appointments process in a rulebound system which is unnecessarily bureaucratic, even taking into account these proposals.</p>
<p>Nadine Waldron, Diocesan Registrar, Derby</p>	<p>Paras 40-42: yes</p> <p>Para 43: I'm a bit concerned that the period of six months might be too long and the deadline forgotten, simply because it is a long way in the future. PCCs might be lulled in to thinking they have ample time, and then miss the deadline; in effect, this is the reverse of having too tight a deadline. The present one, particularly of the six weeks for holding the s12, is definitely too tight.</p>
<p>Clive Scowen, Lay Synod member</p>	<p>40. Yes, to some degree.</p> <p>41. The 4-week period is unnecessarily and unhelpfully tight and some additional time in which to hold the section 11 meetings would be helpful.</p> <p>42 Some extra time is needed.</p>

	<p>43. I agree that a single period rather than 2 consecutive ones, beginning with the start date would be a helpful simplification and reduction of burden. However, 6 months is far too long and is contrary to the objective of reducing delay. The reality is that most PCCs do cope with the existing time limits, so while some additional time will be helpful it does not need to be more than 2 or 3 weeks. I propose a single period of 3 months beginning with the start date.</p>
Reformation Church Trust	<p>40, 41 and 42 No comment</p> <p>43. <i>This is a very great increase, from a total of ten weeks to a total of twenty-six weeks.</i> The patron also requires sufficient time; the proposal would result in some reduction of the time that the patron has. <i>It would seem a much more equitable distribution of the twelve months (if we take that as a fixed element) to give the PCC four months (an increase from ten to sixteen weeks) and allow the patron eight months.</i></p> <p>A patron who is seeking for a new incumbent may have to make many approaches: this inevitably consumes much time. Relatively recently we approached thirteen different clergy in our search to fill a living that appeared not to attract interest. Keeping a list of potential candidates will not guarantee a speedy appointment.</p> <p>We were recently involved in an appointment which followed the method which you describe as “the one most commonly followed”. None of the three candidates who was interviewed was deemed suitable, so the whole process had to be followed through again; the (re-)advertising process and the diaries of the bishop and archdeacon together meant that there was a large interval before a further interview panel meeting could occur.</p>
Sheffield Church Burgesses Trust	This appears more workable and would not seem to be to any disadvantage of the Patron and therefore to be encouraged.
Christopher Whitmey, PCC member Hereford	<p>Q.40, 41, 42 Very definitely YES.</p> <p>Q.43 The present combined total is 10 weeks. The proposed 6 months is too long. 4 months - 16 weeks- would be practicable</p>
Jenny Hollingsworth on behalf of Bishop’s Senior Staff, Portsmouth	<p>Clause 31: When was this ever enforced in bad faith?</p> <p>Clause 33: Fine - don't see how it speeds up the process but can see that it may relieve stress on the PCC Secretary</p> <p>Clause 38: Six months is fine - but people tend to work to deadlines so would be surprised if we see a significant number of the processes being completed early!</p> <p>Clause 41: Has not been an issue for us.</p>
Ian Blaney, Lincoln Diocesan Registrar	<p>40. Somewhat, yes.</p> <p>41.A little.</p> <p>42. Yes.</p> <p>43. Yes.</p>
Diocese of St Albans	<p>Q40 Yes, we agree the procedure should be simplified. We have adapted form 34 and Notes in consultation with the Diocesan Registrar to provide clearer guidance and have tailored versions for Crown livings and Team Ministries. Copies are attached for reference.</p> <p>Q41 We agree the existing periods of 4 weeks for holding S11 meetings and 6 weeks for a S12 meeting are unhelpful (although we have little experience of formal S12 meetings).</p>

	<p>Q42 We agree a longer period should be allowed for the PCC to carry out its duties.</p> <p>Q43 We consider allowing up to 6 months could cause unnecessary delay in the process. 3 months should be adequate, unless a S12 meeting is required. Most PCCs meet at least quarterly and many are now developing their parish profile in advance or on the basis of continuous review. It would be better to make 3 months the norm, with flexibility for the DO to allow a PCC more time in particular circumstances. Provision would be needed for reminders/triggers for action; at present, the trigger for a reminder is the end of the 30 day period (+ 10 days' grace in our case) and we are able to point out that the PCC is at risk of losing its involvement in the process.</p> <p><i>Comments</i></p> <ol style="list-style-type: none"> 1. Most dioceses will have an appointment process. This is likely to include advertising /C of E Pathways system; shortlisting; interviews where applicable. We are concerned that allowing a 6-month period for the PCC to fulfil its duties under the Measure would be an obstacle to an efficient and timely appointment process.
Chapter of York	<p>[40] Yes – for the reasons discussed above.</p> <p>[41] Emphatically yes – the frequently-encountered difficulties in convening section 11 and section 12 meetings and finding dates, times and locations that are convenient for all of the numerous participants who must be present are exacerbated by the unhelpfully short diary 'window' within which the current process requires the meetings to be held.</p> <p>[42] Yes – provided there is ready access to the updated best practice guidance discussed above, with clear advice in that guidance on the need for PCCs to keep matters moving forward with appropriate priority – for example, by emphasizing how difficult it can be to find mutually convenient meeting arrangements for the (perhaps surprisingly) numerous participants who must be present, ensuring that the longer time period being proposed for the PCC to complete all of its work does not result in matters being allowed to 'drift'.</p> <p>[43] Yes – subject to the caveats discussed in relation to paragraph [42] above.</p>
Bob Ball, Holy Trinity Church PCC, Southport	<p>40. Yes</p> <p>41. Yes</p> <p>42. Yes, but four months should be long enough</p> <p>43. No four months</p>
David Lamming	<p>I broadly agree with Proposal 2 and the reasoning behind it. As a PCC secretary, I concur with the potential problems that the present tight timetable imposes. Especially in a multi-parish benefice (and there are many of them in substantially rural dioceses like St Edmundsbury and Ipswich), it is difficult to draft and agree the 'Benefice Profile' in the short time between the section 11 and section 12 meetings. Moreover, convening a section 12 meeting within 6 weeks of a request can be difficult, given the busy diaries of most bishops.</p> <p>18. Some may consider the 6 months proposed to be allowed for the steps set out in para 34 of the CP to err in the opposite direction and is too long. However, if the bishop gives the section 7(2) notice within one month of becoming aware of the impending vacancy, as I have suggested, the necessary flexibility in the timescale can be provided where it is most useful. In the case of our current vacancy, it would mean (ignoring the initial suspension) that the section 7(2) notice would have been given by 25 April</p>

	<p>2018 (that then being the 'start date'), with the six-months expiring on 25 October 2018. As it is, we are effectively 3 months behind that timeline.</p> <p>19. I note, however, and agree that "it should, in most cases, be possible to complete the matters set out in para 34 within less than 6 months."</p> <p>Accordingly, I suggest that a period of 4 months from the start date be set as the 'norm', with power for the bishop to extend this to 6 months in an exceptional case, or where unexpected events require this.</p>
<p>Anne Stunt, Secretary to Board of Patronage Portsmouth Diocese</p>	<p>Yes 40 – 43</p> <p>The Board discussed if the patron should be re-invited into the vacancy process if the presentation has lapsed and would like to suggest this accordingly.</p>

Proposal 3

46. It is proposed that the period of 12 months before lapse occurs should run from the 'start date' specified in the notice given to the PCC secretary by the designated officer.

47. That should mean that there is always a minimum window of 6 months during which the task of finding a suitable priest for appointment and obtaining the approval of the bishop and the parish representatives can take place. If the matters that have to be carried out by the PCC and others (e.g. agreeing the statement describing the needs, conditions and traditions of the parish, holding a joint meeting) are carried out expeditiously, the window for finding a suitable priest will be commensurately greater.

Question on proposal 3

48. Do you agree that if proposals 1 and 2 are implemented, the 12 month period before lapse occurs should run from the start date?

Bishop of Whitby	Yes
Archdeacon of Norfolk	Yes
Rev David Keen	<p>With fewer clergy around, it is increasingly likely that there will be no applicants, or no suitable applicants, the first time a post is advertised. If Dioceses are pushing long vacancies then 12 months will only give 1 opportunity to advertise before presentation lapses. If there is a 12 month period, then the timings need to work so that parishes have at least 2 opportunities to advertise during this. The first advert therefore needs to be placed within the first 6 months.</p> <p>Here is an example timetable</p> <ol style="list-style-type: none"> 1. First advert 6 months from start date 2. Application deadline 7 months. If there are no applicants... 3. Review profile and spec, place new advert 9 months 4. Application deadline 10 months 5. interviews and appointment 11 months. <p>If there are applicants after the first advert, who are interviewed but are unsuitable, this will push stages 3-5 back by a month, taking up the full 12 month period. Thus if an advert is not placed within 6 months of the start date, a parish/patron does not have a realistic chance to review and re-advertise if unsuccessful the first time around.</p>

Mike Todd, Lay Synod Member	I am unclear about the need for a lapse clause anyway. In my experience delays are most common when there is a difficulty in attracting good, or even any, applicants. This is unrelated to whether the post is suspended or not. I assume that the clause dates from a time when appointments were not made for various reasons unrelated to the good of the parish. I cannot imagine we would invent such a clause today, if it had not previously existed. If there was any concern that Patrons were not generally acting in the best interests of their parishes then it would be time to revisit the whole notion of Patronage! However, I am aware that the clause may have caused problems through inadvertent oversight, resulting in missed deadlines, and resulting in real problems with having to re-run parts of the process. Perhaps the Pastoral Committee could be given the power to vary the time if in the best interests of the appointment.
Archdeacon of Bodmin	Yes
Joint Response from the Church Patronage Trust and the Peache Trustees	Yes
Karen Hall, Pastoral Secretary, Norwich	Yes
Angus Deas, Pastoral and Closed Churches Officer, Diocese of York	Proposal 3. Q48. Yes. If a PCC takes its full six months, the remaining six months will be advertising etc
Revd Dr Adrian Hough Exeter DMP Sec	Yes
Ken Gumbley, Chairman, Legislative Committee, Sodor & Man Diocesan Synod	Yes, except that the period should continue to be 18 months as at present
Niall Blackie Joint Registrar Diocese of Lichfield	Yes
Roland Callaby Diocesan Registrar, Bath & Wells and Bristol Dioceses.	Yes
Simon Baynes, Synod Member St Albans	Paragraph 48: No comment.

<p>Rev Katherine Price, Chaplain, Queen's College Oxford</p>	<p>We would agree that the amendment at Proposal 3 is consequent on the amendments in Proposal 2 and would not give rise to any substantial change in practice.</p> <p>However, although this may fall outside the scope of the Legislative Reform Measure 2018, further thought should be given to the purposes for which the lapse provisions exist and whether a blanket twelve-month period reflects these purposes. The intention is to protect parishes in cases in which a patron is negligent or obstinate, either in failing to seek a suitable candidate or in refusing to present a candidate who has the support of the bishop and parish. However, especially in rural areas (which represent by far the majority of our benefices) a vacancy may extend beyond 12 months in spite of the best efforts of all parties, either because the advert has attracted no interest or because the parish, bishop and patron are in agreement that the candidates are not appointable. The lapse of presentation rights affects both the patron and the parish representatives, and should be a last resort.</p>
<p>Neil Parsons, Chapter Steward Norwich Cathedral</p>	<p>Yes</p>
<p>Caroline Mockford Registrar of the Province & Diocese of York for and on behalf of Lupton Fawcett LLP</p>	<p>46. I don't believe that the proposed change would make any real difference to the position now provided by the recent amendments effected the Mission and Pastoral Measure etc. (Amendment) Measure 2018 in terms of the time taken to fill a vacancy. However, a single date from which time runs would, however, have the merit of simplicity. For the reasons set out above, given the longer period before lapse occurs, the simplest solution would be to have time run from the date of the vacancy, rather than the date of the notice. If this was felt to be too tight a timetable, the period before lapse occurs could be extended to 18 months.</p>
<p>Jane Steen Archdeacon Southwark</p>	<p>Yes; then everyone has it in writing and it is clear. But ONLY if proposals 1 and 2 are implemented. If proposal 1 is implemented without proposal 2 one might wish to look again at this.</p>
<p>The Church Pastoral Aid Society (CPAS) include the Martyrs Memorial and Church of England Trust The Church Trust Fund Trust The Church Pastoral Aid Society Patronage Trust.</p>	<p>The CPAS patronage Trustees believe that Proposal 2 should be amended (as indicated in the answer to 43 above). Only if this is done do they agree that the 12 month period before lapse occurs should run from the start date.</p>
<p>David Jenkins Archdeacon of Sudbury</p>	<p>Yes or even 15 months?</p>
<p>The Revd J C Hugh Lee, Synod Member</p>	<p>Yes</p>

Jane, Lowdon Registrar of the Newcastle Diocese and the Carlisle Diocese	Agreed
The Venerable David Bailey Chair – Simeon’s Trustees and Hyndman’s Trustees	<p>Whilst we regard this proposal as reasonable, we would prefer a little longer and ask for consideration to be given to either a period of 15 months from the start date or a period of 12 months from the date of the Section 11 meeting.</p> <p>Further comment</p> <p>1.Our concern about this period is that in the extreme case 6 months would be taken up with the process up to a Section 12 meeting, leaving only 6 months to place advertisements, receive applications, shortlist and interview. Whilst this is sufficient at most times of the year for one ‘round’, it could be difficult to fit in a possible period of reflection and a second ‘round’ of advertising etc. if we were unsuccessful in appointing first time, especially if Christmas or summer holidays intervened. As remarked above, this is a more frequent occurrence of late and a modest extension to the period would be welcome. We have suggested two ways in which this could be achieved.</p>
Bishop of Willesden Pete Broadbent	support – much simpler.
Archdeacon of Berkshire	yes
Nathan Whitehead, Pastoral Secretary, Chelmsford	We feel that, following on from proposal 2, that the period until lapse should be extended to at least 18 months. This would better enable those leading on the vacancies to get through an increasingly demanding time frame for achieving a new appointment, especially when fewer clergy seem to be available.
The Revd Paul Benfield Diocesan Registrar of Blackburn	Yes
Dean and Chapter at Bristol	Content
Simon and Sharon McKie	We have already said that proposals 1 and 2 should not be implemented but even if one accepted that some modified version of them were to be, we believe that the provisions as to the lapsing of the rights of the Patron and of the PCCs' rights in the matter need substantial revision.
Andy Sharp, Lay Co-chair of the PCC of St Stephen with St Julian, St Albans	Yes
Archdeacons of Ludlow and Hereford	Again, not entirely. The reality in rural areas is that it can be difficult to attract suitable candidates to vacancies, and it is not uncommon to have to re-advertise a vacancy at least once and sometimes more than once. Even one re-advertisement can take a benefice over the limit of the 12 month period before lapse occurs. We are keen to ensure that patrons do not feel pushed out of the process when a failure to appoint has occurred. We would

	<p>therefore support a process whereby the timetable leading to lapse can be “paused” and the patrons kept on board without having to go to the lengths of a suspension.</p> <p>We therefore believe that the 12 month period should at the very least run from whichever is later of the start date and the date of the commencement of the vacancy. We would prefer that some mechanism should be introduced to preserve all participants’ rights in the event of a failure to appoint through no fault of their own.</p>
Andrew Bell, Church warden and Synod Member, Oxford	Yes
James Hall, Solicitor and Diocesan Registrar	<i>48 yes, but 18 months would be preferable to 12.</i>
Revd Chris Leslie. member of the Oxford Diocesan Board of Patronage for 18 years, 12 as Chairman	This reflects the changes in the Mission and Pastoral etc (Amendment) Measure 2018 and seems reasonable. It needs to be kept in mind however, that the shortage of ordained stipendiary clergy (which is projected to reduce further) may cause some dioceses to need a longer time-frame. This could be adjusted in the future if needed.
Forward in Faith	Yes – subject to the answer to question 2 (paragraph 27) on proposal 1.
Teresa Sutton Lecturer in Law, University of Sussex	Subject to the reservations noted above in point 5, yes.
Richard Bromley, Intercontinental Church Society	Yes
Helen Dimmock, Crown & Lord Chancellor	Lapse does not apply to Crown patronage so I do not think it is appropriate to comment. If the Order is passed it would be useful to note the differences between Crown and other types of patronage in whatever guidance is developed to support the implementation of these proposals as there is a significant lack of understanding of these. I would be very happy to contribute to that in whatever way is most helpful.
Shirley-Ann Williams, Exeter DBP	The 12 month period should run from when the parish has submitted its documents and an advertisement has been made.
Malcolm Halliday, Lay Synod Member, Leeds	Yes, subject to my answer re proposal 2
Diocese of Liverpool	Yes
Sue de Candole, Registrar Salisbury & Winchester	Yes
Diocese of Leeds	We agree that the 12 month period before lapse occurs should run from the start date.

Gabrielle Higgins, Diocesan Secretary	We agree the 12 month period before lapse should run from the start date.
Chris Gill, Lay Chair of Deanery Synod	What I wouldn't want is the right of presentation removed or the PCC involvement curtailed where the delay is not caused by them. If it is felt that a Bishop is deliberately causing delays to have the right of presentation revert to them then that should be stopped. I would much rather see everyone working together to fill the post
Oliver Home Diocesan Secretary, Bristol	Yes
Hilary Tyler, the Diocesan Registrar, Portsmouth	Now there is a twelve month period from the date of the vacancy before lapse occurs and lapse is to the Bishop rather than the Archbishop no further change would appear to be necessary.
Frances Godden Deputy Diocesan Secretary, DAC and Pastoral Secretary Diocese of Ely	Yes absolutely. Otherwise the risk is that the time period lapses before anything has happened, as can be the case under the current arrangements.
Darren Oliver Registrar and Sara Leader Registry Patronage Manager, Diocese of Oxford	Yes, this certainly makes sense.
Oxford Diocesan Mission and Pastoral Committee and the four Archdeaconry Mission and Pastoral Committees of Berkshire, Buckingham, Dorchester and Oxford.	There was universal agreement of this proposal. Some members raised concern that sufficient guidance should be given to ensure that the Bishop only extend the start date when materially necessary.
Bishop of Leicester and the Bishop's Leadership Team	It has to run from somewhere, so this makes some sense. However, to reduce bureaucracy, it could be held to run from the date on which the benefice actually becomes vacant so that it is related to an event, rather than a date specified in a document.
Nadine Waldron, Diocesan Registrar, Derby	Yes

Clive Scowen, Lay Synod member	The period should certainly run from the start date rather than the date of the vacant. However, in my view at least 9 months is needed for the patrons to try to fill the vacancy. So if 6 months is allowed for the section 11 and 12 meetings, the 12-month period should be extended to 15 months. If however my suggestion that the period allowed for those meetings should be just 3 months, the 12-month period from the start date should be sufficient.
Reformation Church Trust	No comment
Sheffield Church Burgesses Trust	Whilst the period of 12 months seems on the face of it to be reasonable, the experience of this Trust in relation to several recent appointments might suggest that six months, as a period during which to find "a suitable Priest for appointment" after completion of the PCC series of tasks, could well be significantly inadequate. A longer time period would seem to make much more sense to the Trust in the light of its own recent experience.
Christopher Whitmey, PCC member Hereford	Agree
Ian Blaney, Lincoln Diocesan Registrar	In principle that sounds fine, but if there has been a failure to give the proper notices around the start date, then there needs to be a long-stop which might be 12 months from when the vacancy occurred.
Diocese of St Albans	We agree with the proposal that the 12 month period before lapse occurs should run from the "start date"
Chapter of York	Chapter would be reluctant to see any further variation made to the rules as to lapse of Patrons' Rights of Presentation in addition to those recently made by the Mission and Pastoral etc. (Amendment) Measure 2018. However, and as noted in paragraph [47] of the Consultation paper, if the matters to be completed by the PCC and others are indeed attended to expeditiously, the rule change proposed in paragraph [46] should not in practice impact adversely on Patrons' opportunities to exercise their Rights of Presentation. Once again, there is an important role to be played here in preserving Patrons' meaningful involvement in the appointment process by including carefully worded advice on this issue in the updated best practice guidance discussed above.
Duchy of Cornwall	Proposal 3 is not applicable to the 'Crown' ie Duchy of Cornwall in this case.
Bob Ball, Holy Trinity Church PCC, Southport	No, 12 months may not be long enough
David Lamming	I broadly agree with these proposals and have no specific comments.
Anne Stunt, Secretary to Board of Patronage Portsmouth Diocese	It seemed sensible to extend the time to 12 months from the start date. This was favourable for the parish and would lead to a quicker appointment.

Proposal 4

51. However, it might be helpful – and represent the removal of a further obstacle to efficiency – if the patrons who have subsequent turns are informed by the registrar when a turn has been taken so that they are aware of that fact and that their turn is next, next but one etc. That would provide

the opportunity for the registrar to ensure that the information on the patronage register is up to date, to obtain email addresses (see below) and for the patron whose turn it is next to be prepared for his or her turn in due course.

Question on proposal 4

52. Do you agree that where patronage is exercised by different patrons by turns, the registrar should inform the patrons with subsequent turns that a turn has been taken and ask them about any changes to the details contained in the patronage register?

Bishop of Whitby	yes — how can one delicately remind private patrons that the patronage should appear in their will?!?
Archdeacon of Norfolk	No, this is a needless administrative burden and expense
Rev David Keen	Yes
Mike Todd, Lay Synod Member	I agree but I would also go further by requiring greater transparency in the patronage register. I may be making this suggestion based on a specific experience, but I do think it would be helpful to prescribe that the register be public and, preferably, required to be on the diocesan website, or comparable public place
Dean of Southwark	I believe it would be very helpful of the registrar invited us in the instance of dual patrons, whose turn it would be on the next occasion of a vacancy. We would also support as in item 52 that our current contact details are kept by the registrar for the purpose of contacting us on the occasion of a vacancy arising
Archdeacon of Bodmin	Yes
Joint Response from the Church Patronage Trust and the Peache Trustees	Yes
Karen Hall, Pastoral Secretary, Norwich	Yes
Angus Deas, Pastoral and Closed Churches Officer, Diocese of York	Proposal 4. Q52. Yes. Will help reduce out of date data too (GDPR). May even get new pages for the PBM Register(!)
Revd Dr Adrian Hough Exeter DMP Sec	Yes
Ken Gumbley, Chairman, Legislative Committee, Sodor & Man Diocesan Synod	This would be of no practical benefit in the Isle of Man.
Niall Blackie Joint Registrar Diocese of Lichfield	yes! Brilliant ideas
Roland Callaby Diocesan Registrar, Bath & Wells and Bristol Dioceses.	Yes
Simon Baynes, Synod Member St Albans	Question on Proposal 4 Paragraph 52: This sounds sensible.
Rev Katherine Price, Chaplain, Queen's College Oxford	Yes

Neil Parsons, Chapter Steward Norwich Cathedral	Yes
Caroline Mockford Registrar of the Province & Diocese of York for and on behalf of Lupton Fawcett LLP	<p>52. I think it is good practice to notify the patrons as to the status of their respective turns when a vacancy arises and to take the opportunity to check contact details. However, I do not believe that this is a matter in respect of which it would be appropriate to legislate. Further, given that not all registrars are appointed as the designated officer under the Measure, to impose such a requirement on the registrar would impose an additional administrative step in some cases. The form of notice of vacancy used by designated officers is non-statutory, but a recommended form could be provided as part of the guidance that incorporates something along the lines of the following:</p> <p>52.1 <i>The right of presentation in relation to this benefice is exercisable in the following turns:</i> <i>Patron A – Turn 1</i> <i>Patron B – Turn 2</i> <i>Patrons C and D jointly - Turn 3</i> <i>Patron B – Turn 4</i></p> <p><i>The right of presentation is exercisable by for this turn (Turn)</i></p> <p>52.1 <i>The contact details we hold for you are:</i> <i>Postal address.....</i> <i>Telephone number.....</i> <i>Email address.....</i> <i>If these contact details are incorrect, please complete and return Form A attached.</i> <i>Please provide your email address on Form A attached [delete if email address held]</i></p>
Jane Steen Archdeacon Southwark	Yes
The Church Pastoral Aid Society (CPAS) include the Martyrs Memorial and Church of England Trust The Church Trust Fund Trust The Church Pastoral Aid Society Patronage Trust.	The CPAS Patronage Trustees endorse this proposal as a sensible one, which will result in greater clarity especially after suspension is lifted following a new pastoral scheme being implemented. It will also ensure greater accuracy in patronage registers. The CPAS Patronage Trustees respectfully suggest that it is a mutual responsibility for both Patrons and Registrars/Registries to keep their Patronage records and registers up-to-date. Practice among both parties is uneven across the dioceses at present and should be undertaken as necessary good practice and governance. Personnel and emails do change and an annual inquiry might be adopted as both possible and desirable in today's world of electronic communication.
David Jenkins Archdeacon of Sudbury	Yes
The Revd J C Hugh Lee, Synod Member	Yes
Jane, Lowdon Registrar of the Newcastle	I don't see this as particularly necessary. There can be many years elapsing before a second patron exercises his or her turn and I have

Diocese and the Carlisle Diocese	never encountered any difficulty in making contact with a patron. Updated contact details can be obtained at the time that particular patron exercises his or her turn, in my view
The Venerable David Bailey Chair – Simeon’s Trustees and Hyndman’s Trustees	Yes. In general, though, we do not welcome the arrangement ‘by turns’ and much prefer joint patronage where possible
Bishop of Willesden Pete Broadbent	suggest that Patronage by turns be abolished – it makes no sense and reduces the (fairly tenuous) links between patron and benefice. Suggest all joint patronage be exercised jointly at each appointment and not by turns. If not, support proposal as written.
Archdeacon of Berkshire	Yes
Nathan Whitehead, Pastoral Secretary, Chelmsford	We believe these are sensible proposals.
The Revd Paul Benfield Diocesan Registrar of Blackburn	Yes
Dean and Chapter at Bristol	Content
Simon and Sharon Mckie	We do not express an opinion on this question.
Andy Sharp, Lay Co-chair of the PCC of St Stephen with St Julian, St Albans	No comment
Archdeacons of Ludlow and Hereford	Yes, we would welcome this.
Andrew Bell, Church warden and Synod Member, Oxford	Yes
James Hall, Solicitor and Diocesan Registrar	Yes
Revd Chris Leslie. member of the Oxford Diocesan Board of Patronage for 18 years, 12 as Chairman	A better solution here is to make benefices where the patrons are taking turns, to become joint patrons. I fully understand that this is something that is not the remit of the current consultation. However it can be achieved by dioceses if they wish to make the effort! However it is important. Take, for example, a benefice with 7 patrons taking turns. With a typical incumbency lasting 7 years, any one patron will only be exercising patronage once every 50 years! This is complicated by the fact that the Lord Chancellor and the Queen as patrons are not, as I understand it, legally able to act jointly with others. Again this is outside the current consultation, but is something that should be examined under other legislative moves. It can be somewhat avoided by an arrangement, which exists in more than one Benefice in the Oxford Diocese, where the other patrons act jointly and take turns with the Lord Chancellor or the Queen. Bearing in mind that the above cannot take place within this consultation, Proposal 4 seems a sensible one.

Forward in Faith	Yes – a very sensible proposal which should ensure minimal delay.
Teresa Sutton Lecturer in Law, University of Sussex	Yes, this has the advantage of keeping the register up to date and meeting requirements of openness. In benefices where there are a large number of turns a patron may not be involved with a parish for many years and notification that it will be their turn next will promote engagement with the benefice which is one of the markers of successful modern patronage arrangements. I was surprised by the level of complication of some of the patronage arrangements I encountered. For example, a recurring series of five successive turns in a benefice is a long way from the original concept of patronage and gives little continuity for a parish.
Richard Bromley, Intercontinental Church Society	Not applicable to us
Helen Dimmock, Crown & Lord Chancellor	Yes: as stated above is it useful to be up to date on the situation in the benefices where we have an interest and this can also prevent mistakes in whose turn it may be to appoint.
Shirley-Ann Williams, Exeter DBP	Yes. It has not always been possible for patrons to know when it is their turn. The patronage register is not always accurate or up to date so this would remedy that matter.
Malcolm Halliday, Lay Synod Member, Leeds	Yes – good liaising between the Registry and the Designated Officer is important here so the latter is up to date
Diocese of Liverpool	Yes, more communication is always good, and up-to-date information in the patronage register is even better! Though in the Diocese of Liverpool we have very few benefices where patronage is by turns.
Sue de Candole, Registrar Salisbury & Winchester	Yes – such a sensible idea
Diocese of Leeds	We agree that the registrar should inform patrons of turns that have been exercised and ask patrons to inform them of any changes to their details contained in the patronage register.
Gabrielle Higgins, Diocesan Secretary	We agree patrons should be informed by the registrar.
Chris Gill, Lay Chair of Deanery Synod	Again I am not sure this is one for the Patronage Measure, but may better sit with the Pastoral measure. Many of these and similar problems caused by multi parish benefices would be better resolved by having one Benefice with one Patron and one PCC. However, I am not convinced advising different Patrons that a turn has passed and seeking out their e-mail details would be of all that benefit given it would hopefully be at least another 5 years before the turn comes round again and it is quite likely that there will be further changes by then. The measure may be better asking for the patron to provide updates. It would also be better setting out a clear process for contacting Patrons with an end date and a clear path if the Patron can't be contacted by that end date. What value is there in having Patrons who don't show an interest in their Church at any other time than appointments?
Oliver Home Diocesan Secretary, Bristol	Yes

Hilary Tyler, the Diocesan Registrar, Portsmouth	In benefices where Patrons present alternately or by turn we notify the patrons whose turn it is not and provide them with a copy of the notice for information but if it was felt necessary to include a statutory provision to this effect so be it. As we have few outside patrons in this Diocese we have not experienced any problem with obtaining up to date contact details as secretaries of Patronage Boards regularly update us anyway and sending a notice to the appropriate person by office at an Oxford or Cambridge College has not in the past failed to elicit an answer.
Frances Godden Deputy Diocesan Secretary, DAC and Pastoral Secretary Diocese of Ely	Yes absolutely. Where patronage is exercised in turns we endeavour to keep all patrons informed of appointment developments, and also pass on details of any changes to the Registry. It would be helpful to have this formalised as a requirement.
Darren Oliver Registrar and Sara Leader Registry Patronage Manager, Diocese of Oxford	Of course, it is sensible to keep records as up-to-date as they can be and for all patrons to be kept informed but this does increase the obligations on the Registrar and this should be made clear to the bishops and diocesan secretaries.
Oxford Diocesan Mission and Pastoral Committee and the four Archdeaconry Mission and Pastoral Committees of Berkshire, Buckingham, Dorchester and Oxford.	There was a consensus that this proposal was helpful and would be of particular benefit to the patron next in turn. <ul style="list-style-type: none"> • Some members suggested that it would be helpful for the registrars to include the Diocesan Pastoral Secretary in these communications, so that the Diocese was also aware of whose turn was next due as a matter of course. • There was a further recommendation that an annual check on Patrons' details by the Registry would also help avoid possible delays, although it was acknowledged that this might result in overstressing the Registry's resources from a time perspective.
Bishop of Leicester and the Bishop's Leadership Team	We are surprised that the LRC is seeking to remove obstacles to efficiency by introducing additional rules and procedures! We agree it might be helpful for the Registrar to do this. We do NOT agree that it should be written into the rules.
Nadine Waldron, Diocesan Registrar, Derby	That could be done and might indeed be useful, if time-consuming. One of our benefices has seven turns which will take years to work through.
Clive Scowen, Lay Synod member	That would seem to be sensible. But the real problem is the existence of patronage by turns, which is unhelpful and leads to inconsistent appointments. I propose that all patronage by turns be converted to patronage exercised jointly: if such a change cannot be made by an order under the LRM, an early opportunity should be found to legislate by Measure.
Reformation Church Trust	This would be helpful, especially as, when patronage is by turns and there has been a suspension, the situation can seem unclear.
Sheffield Church Burgesses Trust	Proposals 4 and 5 : Both of these proposals are viewed favourably by the Burgesses and could be seen as helpful in the life of this Trust, especially where there is joint patronage of an ecclesiastical living.
Christopher Whitmey, PCC member Hereford	Agree – effective administration
Jenny Hollingsworth on behalf of Bishop's	Clause 52: Yes Clause 54: Don't see a problem with this but would patrons ever avail of it?

Senior Staff, Portsmouth	
Ian Blaney, Lincoln Diocesan Registrar	Any such duty should lie with the designated officer who holds the patronage register and who may or may not be the registrar. It is not a bad idea but the problem is that these turns may take many years to come around, or potentially never because of the regularity of pastoral reorganisation. Nonetheless it is a good idea for the patrons to be contacted to keep them 11in the loop11 as regards the exercise of patronage and to check that their details have not been changed so some communication to them would be no bad thing.
Diocese of St Albans	The Registrar already notifies the patrons about whose turn it is. The proposal appears to place an additional administrative burden on the Registrar and it is not clear that this is justified.
Chapter of York	Emphatically yes – and Chapter warmly welcomes this thoughtful proposal. It is not unusual for a Patron to find themselves named in a long list of sequential ‘turns’, with no information at all about the date on which the Rights of Presentation were last exercised or the identity of the Patron who last exercised them. Any exercise of Rights marks the start of a new chapter in the life of the Benefice concerned and, as noted above, the Chapter of York is keen to be a supportive, engaged and encouraging Patron in the life of its patronage parishes. The proposal in paragraph [54] would accordingly give Chapter the opportunity to be in appropriate pastoral contact with its patronage parishes whenever Rights are exercised, including those occasions when another Patron is taking their ‘turn’, as well as achieving the procedural efficiencies that the proposal envisages.
Bob Ball, Holy Trinity Church PCC, Southport	Yes
David Lamming	I broadly agree with these proposals and have no specific comments.
Anne Stunt, Secretary to Board of Patronage Portsmouth Diocese	Yes

Proposal 5

55. It is proposed that where patronage is exercised jointly by two or more patrons, there should be a facility for any patron to nominate one of the other patrons to act on his or her behalf for the purposes of filling the vacancy.

Question on proposal 5

56. Do you agree that where patronage is exercised jointly a joint patron should be able to nominate one of the other patrons to act on his or her behalf?

Bishop of Whitby	In principle, yes: doesn't the Measure already allow this [s8(2) in respect of bodies and s8(3) in respect of individuals]? An additional tangential thought: this does raise the question whether patrons acting jointly all need to consent to the choice of candidate (clearly desirable) or whether any patron may insist on a vote. In such a case, does one patron acting for another have a second (proxy) vote?
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Archdeacon of Norfolk	No. There should be a proposal to allow the Bishop to act but not one of the other patrons. Otherwise there is the law of unintended consequences of some patrons seeking greater influence.
Rev David Keen	Yes
Mike Todd, Lay Synod Member	Yes
Dean of Southwark	I would support the possibility that as a group of patrons, we could nominate one patron to act on our behalf in filling the vacancy
Archdeacon of Bodmin	Yes. This would be really helpful, but some guidance regarding how this may happen will be useful. I am aware of multi-parish benefices whose joint patrons are theologically and traditionally at opposite ends of the spectrum – how will they agree regarding such delegation?
Joint Response from the Church Patronage Trust and the Peache Trustees	Yes
Karen Hall, Pastoral Secretary, Norwich	Yes
Angus Deas, Pastoral and Closed Churches Officer, Diocese of York	Q56. Yes, but I think this is already allowed. A patron can nominate a representative, who then has to declare their membership. I would imagine the representative could be one of the joint patrons if required. Adding another mechanism will not reduce administrative burden. And the opportunity to exercise patronage is so relatively rare for most private individuals or individual office holders (the vicar for the time being of...) that I expect they wouldn't want to miss the opportunity.
Revd Dr Adrian Hough Exeter DMP Sec	Yes
Ken Gumbley, Chairman, Legislative Committee, Sodor & Man Diocesan Synod	This would be of no practical benefit in the Isle of Man.
Niall Blackie Joint Registrar Diocese of Lichfield	Yes
Roland Callaby Diocesan Registrar, Bath & Wells and Bristol Dioceses.	Yes
Simon Baynes, Synod Member St Albans	Paragraph 56: Yes.
Rev Katherine Price, Chaplain, Queen's College Oxford	Yes
Neil Parsons, Chapter Steward Norwich Cathedral	Yes
Caroline Mockford Registrar of the Province & Diocese of York for and on behalf of Lupton Fawcett LLP	56. I agree that there should be a facility to enable a joint patron to nominate one of the other patrons to act on his or her behalf. It is possible now for one joint patron to act on behalf of the others under power of attorney given for this purpose, but a right of nomination would be even simpler.

Jane Steen Archdeacon Southwark	56. No. Patronage is an important, if sometimes irritating, part of the polity of the Church of England. I think that handing over shared patronage to another patron could all too easily result either in the bishop effectively appointing to parishes where s/he was one of the joint patrons, or in the case of benefices where the patrons are of quite different church traditions, the dominant tradition of the day could effectively or in reality secure the patronage. It's better that people work together!
The Church Pastoral Aid Society (CPAS) include the Martyrs Memorial and Church of England Trust The Church Trust Fund Trust The Church Pastoral Aid Society Patronage Trust.	Yes, the CPAS Patronage Trustees endorse this proposal
David Jenkins Archdeacon of Sudbury	Yes
The Revd J C Hugh Lee, Synod Member	Yes
Jane, Lowdon Registrar of the Newcastle Diocese and the Carlisle Diocese	How do you envisage this working in practice? Would the nominee patron have two votes in any decision (one in their own right and one on behalf of the patron they represent). Would the patron who has been appointed be obliged to follow the instruction of the appointing patron even though their own view might differ?
The Venerable David Bailey Chair – Simeon's Trustees and Hyndman's Trustees	Yes Further comments 1.It should be made very clear that this can only be 'on a voluntary basis' as stated, and that there is a distinction between this and a more informal arrangement where one patron steps back from a part of the process, say for diary reasons, but asks that a co-patron act at that point for both of them. 2.It might be advisable to state at what stage of the process such nominations may take place. We would suggest 'at any stage'. It might also be necessary to consider whether such a nomination might apply to a part of the legal process only, e.g. Section 12 meeting attendance, rather than throughout the whole process, or from when the nomination is made to the end of the process. 3.Para. 54 appears to expect that each joint patron severally will obtain the consents and send a notice of presentation to the bishop. We are not sure this always occurs in practice but, if it is not already possible, it would be more efficient to allow joint communication between the patrons (signed by all) and the various parties.
Bishop of Willesden Pete Broadbent	Support
Archdeacon of Berkshire	Yes
Nathan Whitehead, Pastoral Secretary, Chelmsford	We believe these are sensible proposals.

The Revd Paul Benfield Diocesan Registrar of Blackburn	Yes
Dean and Chapter at Bristol	Content
Simon and Sharon McKie	We do not express an opinion on this question.
Andy Sharp, Lay Co-chair of the PCC of St Stephen with St Julian, St Albans	Yes
Archdeacons of Ludlow and Hereford	Yes, we would welcome this. However there should be a clear written procedure for doing this and for notifying the Bishop in advance of any such nomination.
Andrew Bell, Church warden and Synod Member, Oxford	Yes
James Hall, Solicitor and Diocesan Registrar	Yes
Revd Chris Leslie. member of the Oxford Diocesan Board of Patronage for 18 years, 12 as Chairman	This proposal seems eminently sensible and, indeed, on occasion, has been operated within this diocese.
Forward in Faith	Yes, provided that it remains an option and there are no penalties for failing to do this.
Teresa Sutton Lecturer in Law, University of Sussex	Yes, my research showed that some situations are made very difficult by the number of different parties involved in decisions. However, the guidance will need to emphasise the 'voluntary basis' noted in para 54 to avoid patrons being put under pressure to effectively relinquish their role. Some patrons might welcome relief from the administrative burdens outlined in para 54 but wish to retain some input into the actual appointment. Where private patronage rights are retained that possibility should be facilitated. The difficulties outlined in paras 49-56 all point towards the need for more substantive reform outside of the current process under the Legislative Reform Measure.
Richard Bromley, Intercontinental Church Society	Not applicable to us
Helen Dimmock, Crown & Lord Chancellor	Not applicable to Crown patronage.
Shirley-Ann Williams, Exeter DBP	Yes if the Patrons are agreed about this. Sometimes though the joint patrons can be of different ecclesiastical groups so it would be important for all shades of opinion to come to an agreement as there could be different views of churchmanship amongst the parishioners and all must be respected.
Malcolm Halliday, Lay Synod Member, Leeds	I am not sure that this is necessary – does not the Patron have the opportunity to appoint a representative in any event?
Diocese of Liverpool	Yes. We assume that this proposal would go beyond the power given in section 5(3) of the 1986 measure to nominate by power of attorney, since this already exists. If this facility is

	<p>analogous to the provision in section 8(2) of the 1986 Measure allowing bodies of persons who are patrons to nominate a representative, then we wonder if this proposal goes far enough. Would it be possible to allow a patron to nominate any representative either in Holy Orders or able and willing to make the declaration of membership, whether another patron or not?</p>
Sue de Candole, Registrar Salisbury & Winchester	Yes
Diocese of Leeds	We agree that there should be a facility for patrons to nominate one of the other patrons, in joint patronage, to act on their behalf.
City of London Corporation	<p>As regards proposal 5, which would enable joint patrons to be able to voluntarily nominate one of the other patrons to fill a vacancy, it is considered beneficial for this proposal also to apply where patronage is exercised by patrons successively to allow successive patrons voluntarily to nominate one of the other patrons to act for them in relation to an appointment, particularly as some patrons may have limited involvement with the benefice.</p> <p>Acceptance of nominations in both circumstances should also be voluntary</p>
Gabrielle Higgins, Diocesan Secretary	We have no objection to further enabling a joint patron to nominate one of the other patrons to act on their behalf but question whether it is necessary: they could already appoint that patron (if an individual) or that patron's representative to act on their behalf.
Chris Gill, Lay Chair of Deanery Synod	As above, I would prefer to have this resolved by the Pastoral Measure, but yes it should be possible. Before putting it in the measure I would ask is it likely
Oliver Home Diocesan Secretary, Bristol	<p>Yes, in principle. However, we have a concern that it could take some time to establish whether the patrons would like to take up this option and who would be the nominated patron. This could potentially hold up the process as the PCC would need to know if one or all of their patrons will be involved, so that it can decide the following matters:</p> <p>a) Whether to request the patron to consider advertising the vacancy;</p> <p>b) Whether to request a joint meeting with the bishop and patron (section 12 meeting).</p> <p>In addition, this option could become even more complex in benefices with joint patronage that have more than two patrons (50% of joint patronage benefices in the Diocese of Bristol, for example). As the proposal suggests that patrons can individually decide whether to take up this option there is then the question of who they will choose to nominate and would this person/group be willing to act on their behalf?</p> <p>If it is decided to include this amendment, we would suggest a time limit for a decision would be needed to stop this from dragging on. Also, in practice, thought would need to be given to how the patrons communicate with each other to decide who to nominate. If they are to communicate directly with each other, the designated officer would be required to ascertain if the patrons are content for</p>

	the contact details to be shared. Alternatively, all communication could run through the designated officer. However, holidays, weekends and time out of the office could slow communication down.
Hilary Tyler, the Diocesan Registrar, Portsmouth	I have no particular problem with this proposal but we have experienced no difficulty with the present arrangement.
Frances Godden Deputy Diocesan Secretary, DAC and Pastoral Secretary Diocese of Ely	Yes if they wish to. However the patron's discretion should be retained, particularly where patronage is exercised jointly by patrons of different traditions in terms of churchmanship and local priorities.
Darren Oliver Registrar and Sara Leader Registry Patronage Manager, Diocese of Oxford	Given our experience we are not convinced that this is necessary or attractive. How is it different to patrons appointing a representative under Form 15, for instance? If the process were exercised, would the nominating patron be stated to be an appointing patron for the relevant appointment or do they give away their right of presentation when nominating another patron to act?
Oxford Diocesan Mission and Pastoral Committee and the four Archdeaconry Mission and Pastoral Committees of Berkshire, Buckingham, Dorchester and Oxford.	It is our understanding that the current legislation allows for this facility already (section 8(1)(b) of the P(B)M)
Bishop of Leicester and the Bishop's Leadership Team	Why does it have to be another patron? Why can it not be possible for a patron to nominate the bishop or PCC reps to act on their behalf? The patron should be able to nominate any one of the three parties to the appointment to act in this way.
Nadine Waldron, Diocesan Registrar, Derby	This would be a useful facility provided the patron who is standing to one side allows the nominee to act freely and doesn't try to fetter or interfere in the process.
Clive Scowen, Lay Synod member	Yes
Reformation Church Trust	We are cautious of this as a practice: we believe that patrons should exercise their responsibilities; they should not be encouraged to neglect them, hindered from exercising them, or even pressed not to exercise them. Is this facility not already available, for instance when a patron who is not a (communicant) member of the Church of England is required to appoint someone to act on his behalf?
Sheffield Church Burgesses Trust	Proposals 4 and 5: Both of these proposals are viewed favourably by the Burgesses and could be seen as helpful in the life of this Trust, especially where there is joint patronage of an ecclesiastical living.
Christopher Whitmey, PCC member Hereford	Agree – effective administration
Jenny Hollingsworth on behalf of Bishop's Senior Staff, Portsmouth	Yes
Ian Blaney, Lincoln Diocesan Registrar	No. This is not necessary. One of the joint patrons can appoint a representative if he/she/it wishes to, or is compelled to do so

	<p>because not eligible to act themselves. It is not clear from the proposal whether the appointment of the other joint patron to "act on his or her behalf" would mean that the other patron would need to act in a way that is consistent with the appointer's wishes and what would happen if that conflicted with what the appointee wanted. Additionally, it could be used to exert pressure by more dominant patrons who are less dominant to appoint the dominant patron to act alone. I suspect that there is not a problem to be solved in this case.</p> <p>Where there may need to be a new provision however is where a patron refuses to act or respond to correspondence. Perhaps in such a case, where reasonable endeavours had been expended on seeking a reply from the address in the Patronage Register, a joint patron could act alone, or in the event of a sole patron whose turn it was, it could move to the next turn.</p>
Diocese of St Albans	We agree a joint patron should be able to nominate one of the other patrons to act on his or her behalf.
Chapter of York	Yes – but solely as an optional opportunity to nominate, rather than a requirement or an expectation that nomination will be the 'norm' whenever a 'large' number of Patrons is entitled to exercise Rights of Presentation jointly. If such a joint exercise is thought to be terminally problematic, the Bishop may wish to consult the Patrons on the possible utility of reconstituting their individual Rights (by means of an appropriate Scheme) into a corporately-structured exercise of Rights through membership of a Patronage Board.
Duchy of Cornwall	Proposal 5 is not applicable to the 'Crown' ie Duchy of Cornwall in this case.
Bob Ball, Holy Trinity Church PCC, Southport	Yes
David Lamming	I broadly agree with these proposals and have no specific comments.
Perry Chadwyck-Healey, Salisbury DBP	<p>With reference to Proposal 5 (paras 55 and 56) I would like to see a nomination to allow another patron to act on a patron's behalf to be indefinite unless it is re-claimed. (In an ideal world they might be persuaded to relinquish their patronage all together). My point is that many of the institutional patrons cannot really know the parishes and benefices involved and they could pass their responsibility to another patron who might be better able to help in a selection process. There are, of course, exceptions (such as CPAS) who seem to carry out their work with great thoroughness but there must be many patrons who by dint of geography or time are unable to visit and understand the needs of the benefices.</p> <p>Obviously, I am biased towards the Boards of Patronage as we have a tradition of visiting all our benefices at least once a year and attending both short-listing and interviews when needed.</p>
Anne Stunt, Secretary to Board of Patronage Portsmouth Diocese	Clarification was needed in the case of nominations if there were joint patrons. If the patronage was exercised by taking turns and a patron passed his or her right on and nominated one of the other patrons to act on his or her behalf, would this still count as their turn?

Proposal 6

58. It is accordingly proposed that the Measure and the rules made under it be amended– (a) to enable the use of communication by email and communication through a website or other electronic means as an alternative to sending notices and other documents by post; (b) to require the patronage register for each diocese to include details of the email address of each registered patron where the patron has provided one.

Question on proposal 6

59. Do you agree that the Measure should be amended to enable email and other electronic forms of communication?

Bishop of Whitby	Yes
Archdeacon of Norfolk	Yes, and that this should be the norm for such communications. If a patron or PCC requires it in another form, then they should pay the reasonable costs of doing so (staff time and postage)
Rev David Keen	Yes
Mike Todd, Lay Synod Member	I agree, all the more so because our PCC Officers are volunteers and may not always be 'at home' in the time that a postal communication is delivered (I speak from personal experience regarding triennial elections!)
Dean of Southwark	I would be very supportive of using email and other digital communication via website or other means for the sending out of notices and documents, as opposed to using the postal system. As a patron, we would be happy to supply our own electronic contact details to the registrar for that purpose. We would therefore agree that the Measure should be amended to enable this kind of communication to take place in the future.
Archdeacon of Bodmin	Yes absolutely
Joint Response from the Church Patronage Trust and the Peache Trustees	Yes
Karen Hall, Pastoral Secretary, Norwich	Yes
Angus Deas, Pastoral and Closed Churches Officer, Diocese of York	Q59. Yes. Make it the primary means of communication, with paper being used only where no e-mail address is known or it becomes known that the speed of the internet (rural areas, mainly) prevents efficient communication. We don't need both.
Revd Dr Adrian Hough Exeter DMP Sec	Yes, my only caveat is that in Proposal 6 / paragraph 58(a), the use of electronic communications should be an option not mandatory. In small rural parishes we still have PCC Secretaries who do not use electronic communications. Therefore it is important that the word 'alternative' is part of the proposal rather than 'in place of' and that it means what it says
Ken Gumbley, Chairman, Legislative Committee, Sodor & Man Diocesan Synod	This would be a useful reform (except in relation to the inclusion of email addresses in the register of patrons).
Niall Blackie	agreed. This is something we are very keen on

Joint Registrar Diocese of Lichfield	Question 59: it is perhaps easier said than done. If it is to be done, it should cover PCC secretaries too. A practical issue which then arises is as to the way in which people tend to change email address. Given that vacancies may take place many years apart, and that patrons are very lax about telling us when they move house, let alone change email provider, this laudable objective may be difficult. We have some whose email addresses are those of their factotums (and so we get asked by the new secretary to Lord X to note a new email address, and even if the request were to purport to come from Lord X himself it could be an electronic imposter). I would suggest that it might be safer to provide for the initial Form 31 to go by post and for an immediate acknowledgement of service to be returned to the DO stating email address for that turn. Please will you consider the GDPR implications of any decision, and for example ensure that the new regulations expressly enable the DO to share the details of a PCC secretary's address/email with the Patron and vice-versa.
Simon Baynes, Synod Member St Albans	Paragraph 59: Yes, most definitely. I would go further: the default mechanism of notification should be e-mail and the participants (Bishops, senior staff, Patrons, Church Wardens and PCC Members) should need to elect for another form of communication at the point where they are elected/appointed.
Rev Katherine Price, Chaplain, Queen's College Oxford	Yes
Neil Parsons, Chapter Steward Norwich Cathedral	Yes
Caroline Mockford Registrar of the Province & Diocese of York for and on behalf of Lupton Fawcett LLP	I agree that the Measure should be amended to enable email and other electronic forms of communication
Jane Steen Archdeacon Southwark	Yes
The Church Pastoral Aid Society (CPAS) include the Martyrs Memorial and Church of England Trust The Church Trust Fund Trust The Church Pastoral Aid Society Patronage Trust.	The CPAS Patronage Trustees endorse the use of electronic communications to speed up process. They request that the Designated Officer should be required to record that Notices have been acknowledge by the recipients and interested parties because of the problem of electronic communications being easily lost in transit to spam filters or other security software.
David Jenkins Archdeacon of Sudbury	yes as long as adequate electronic storage is arranged.
The Revd J C Hugh Lee, Synod Member	Yes. However, the Measure should recognise that some members of the PCC(s) may not have easy access to email or other electronic forms of communication and the Measure should ensure that all PCC members

	are given the option to request to be informed by hard copy for all significant matters.
Jane, Lowdon Registrar of the Newcastle Diocese and the Carlisle Diocese	Yes, although what safeguards would need to be put in place to comply with GDPR?
The Venerable David Bailey Chair – Simeon’s Trustees and Hyndman’s Trustees	Yes
Bishop of Willesden Pete Broadbent	support. Even better if a dedicated web page with password protection could be set up on each diocesan website, whereby all parties could log in and certify that they have completed each part of the process. The Statement and other parish documents (QQ report, accounts, MAP, etc.) could be hosted on the web page
Archdeacon of Berkshire	Yes, although we still have those who are not on email and there would need to be proper protocols for making sure that they were included.
Nathan Whitehead, Pastoral Secretary, Chelmsford	We believe these are sensible proposals.
The Revd Paul Benfield Diocesan Registrar of Blackburn	Yes
Dean and Chapter at Bristol	Content
Simon and Sharon Mckie	We agree that e-mail communication should be allowed but that communication by other electronic forms should not be allowed until the proposed procedures may be judged against prototype systems.
Andy Sharp, Lay Co- chair of the PCC of St Stephen with St Julian, St Albans	Yes
Archdeacons of Ludlow and Hereford	Yes, we would welcome this.
Andrew Bell, Church warden and Synod Member, Oxford	Yes
James Hall, Solicitor and Diocesan Registrar	yes Where an email address is supplied, what consent should a diocese have from the relevant person under GDPR?
Revd Chris Leslie. member of the Oxford Diocesan Board of Patronage for 18 years, 12 as Chairman	This proposal seems eminently sensible and, indeed, has been operated within this diocese as far as is possible.
Forward in Faith	Yes – provided that, where no response has been received to an email within, for instance, seven days, documents should be sent by post. This

	would take account of the fact that email is not a completely reliable way of communication: both hardware and software can fail, and can fail to arrive, be consigned to junk folders or be sent to addresses that no longer work
Teresa Sutton Lecturer in Law, University of Sussex	Yes. I would also welcome the suggestion of an online system for filling vacant benefices (para 57). The current system of mainly paper based files needs to be made more accessible for all parties.
Richard Bromley, Intercontinental Church Society	Definite yes
Helen Dimmock, Crown & Lord Chancellor	Yes: we have already asked for all communication to be by electronic means whenever possible.
Shirley-Ann Williams, Exeter DBP	Yes (a) but postal communication should always be an option. There are still some parishioners, young and old, who do not have electronic apparatus. This in rural areas can be due to a lack of signals or in other cases where the financial outlay is too much. (b) Yes
Malcolm Halliday, Lay Synod Member, Leeds	Agreed
Diocese of Liverpool	Yes absolutely
Sue de Candole, Registrar Salisbury & Winchester	Yes - vital
Diocese of Leeds	We definitely agree that the use of electronic forms of communication should be allowed by the measure and should be encouraged.
Gabrielle Higgins, Diocesan Secretary	We agree that electronic communication should be enabled.
Chris Gill, Lay Chair of Deanery Synod	Absolutely, but it needs to include safeguards, so, where it is an important document, receipt is acknowledged to ensure that a sent e-mail has in fact been received
Oliver Home Diocesan Secretary, Bristol	Yes
Hilary Tyler, the Diocesan Registrar, Portsmouth	We have not experienced any problem with the present rules and the outside Patrons seem to prefer paper but it could be convenient to have the alternative of electronic communication. However, the bulk of the attachments might cause problems and there is always a concern about the possibility of interference if security levels are not high enough which is less of a problem with hard copy.
Frances Godden Deputy Diocesan Secretary, DAC and Pastoral Secretary Diocese of Ely	Yes, provided that notices are sent still in their proper form and not just an email – we would still wish to see a ‘wet ink’ signature, even if scanned.
Darren Oliver Registrar and Sara Leader Registry Patronage Manager, Diocese of Oxford	We would support this proposal given the opportunities for increasing efficiency but we would need to be clear about a number of practicalities. In particular, as to whether the bishop or registrar could elect to use electronic means for one contact in an appointment and post for another. There are some patrons or PCC secretaries who would find email difficult and imposing it would be unduly restrictive.

	<p>There will also have to be some clear provisions or guidance (along the lines of an electronic communications code) at the very least, setting out rules for service and whether, for example, documents should be sent by post if there has been no email acknowledgement of emailed documents within a specified period.</p> <p>Until such time as the Church Representative Rules make provision for PCCs to operate electronically, then it would also be important to draw the distinction in this process to avoid the possibility of PCCs assuming they could make section 11 decisions by email.</p> <p>Similarly, it would be sensible to include email addresses in the patronage register but to be clear, particularly for data protection, as to the Registrars' statutory obligations in holding, updating or releasing this information to third parties.</p>
Oxford Diocesan Mission and Pastoral Committee and the four Archdeaconry Mission and Pastoral Committees of Berkshire, Buckingham, Dorchester and Oxford.	<p>All parties agreed that electronic communication should be both permitted and encouraged, but care should be taken to ensure safe delivery is confirmed.</p> <p>Considerable concern was raised that whilst electronic communication should be permitted, it would be advisable that written notification in hard copy should be issued in addition to any emails sent so as to ensure:</p> <p>a) notification is received in a timely manner in cases where the electronic notification is not received due to technical issues etc. <i>and</i></p> <p>b) to prevent the disenfranchisement of PCC members who do not engage with electronic communication.</p>
Bishop of Leicester and the Bishop's Leadership Team	<p>Yes. Email should be the default method where an email address is available.</p> <p>However, instead of requiring the patronage register to contain the email address for the patron, it would be better to require the patron to provide an email address where they have one.</p>
Nadine Waldron, Diocesan Registrar, Derby	<p>The use of e-mail should be permitted provided proper signatures are used and documents scanned across. E-mail signatures can be affixed by anyone who has access to them and cannot be relied upon to show that the correct person has authorised their use.</p>
Clive Scowen, Lay Synod member	<p>Absolutely!</p>
Lichfield Board of Patronage	<p>Under Proposal 6 (a) the amended measure would enable the use of communication by email and communication through a website or other electronic means as an alternative to sending notices and other documents by post.</p> <p>Our concern is that where processes are triggered by the issue of notices by officers to parishes and patrons are believed to have been delivered when an email is sent or a notice is published on a website that the appropriate person has receive it or seen it on the website.</p> <p>In some of the remote rural areas (and in some urban areas) internet connections are intermittent if they exist at all. As a result, a situation could arise where the six month period for completing the various vacancy processes has begun and the parish or patron be unaware the clock is ticking as they do not have the means to access email or the web on a regular or consistent basis.</p> <p>It is possible to send the email with a request for confirmation of delivery however this only confirms that the message was delivered to the mail server and not necessarily to the recipient. Likewise, the email can be</p>

	<p>sent with a request for confirmation that the email has been opened (read) by the recipient. This confirmation is not automatic. The recipient can opt out of automatic confirmations and in this situation the confirmation would not be sent.</p> <p>Similarly, when notices are sent by post it is considered that the notice has been served once it has been posted. However, on occasions mail goes astray and thus the patron or parish is not aware the six month period has begun.</p> <p>We feel there is a need for a mechanism, whether using electronic means or post, for the sender to be provided with an acknowledgement that the notice has been received.</p> <p>These none delivery situations would in practice be rare however, with appropriate safeguards to ensure the email or post has been received we see the provision of using electronic facilities as a welcome addition.</p>
Reformation Church Trust	<p><i>We are strongly opposed to the use of email for communication of formal notices.</i> The opportunities for error, misdirection, loss, and confusion are greater with email. Our experience is that there is already a degree of inefficiency in the handling of patronage matters by some diocesan offices (failure to record patron’s correct address, failure to notify of vacancy, failure to give proper notice of Section 12 meeting).</p> <p>When we wrote last May to a parish representative to assure her of our Trust’s concern for the parish and to explain that our lack of communication was due to our not having been informed of the vacancy and our not having been given proper notice of a Section 12 meeting, she replied: “I know they have a new team in the Diocesan Office and there have been a few teething problems with other matters so I imagine this fell foul of that too.” This is what can happen and it is not acceptable. <i>The allowing of email communication of formal notices would increase the opportunities for such failure and facilitate excuses for it.</i></p>
Sheffield Church Burgesses Trust	This is welcomed
Christopher Whitmey, PCC member Hereford	Agree – effective administration
Ian Blaney, Lincoln Diocesan Registrar	I would question whether electronic communication is reliable enough. Emails end up blocked or in spam boxes and some users change their email addresses regularly. While correspondence might also be by electronic means, I consider that the key documents need to be served by post for added security and reliability. It would however be useful to have emails listed in the Patronage Register where available, in the same way emails can be included in the proprietorship register of titles at the Land Registry.
Diocese of St Albans	We agree email and other electronic communication should be enabled – and used as far as possible
Chapter of York	Emphatically yes – both elements of the welcome proposal in paragraph [58] have the potential to achieve substantial improvements in the efficiency of the communications that are required from the participants at various points throughout the appointment process.

Bob Ball, Holy Trinity Church PCC, Southport	Yes
David Lamming, Lay Synod Member	I agree that the Measure should be amended to permit e-mail and other electronic communication. The Revision Committee for the Church Representation and Minsters Measure (on which I also served) has included such provision in the draft revised Church Representation Rules: it may be that the Archbishops' Council or the Simplification Group should consider a Measure making such communication standard throughout ecclesiastical law, subject to any specific exclusions.
Anne Stunt, Secretary to Board of Patronage Portsmouth Diocese	Yes to question 59. The Board felt that electronic communication should be strongly encouraged and likewise recommended that where parish websites are in use parishes should be encouraged to publish notification there as well.

67. However, although no amendments to these provisions are currently proposed, we would welcome responses on whether there are in fact further improvements that could be made to them with a view to reducing burdens.

Multi-parish benefices

Bishop of Whitby	Paragraph 4(1): This would need amending in order to accommodate the single 12-month period envisaged in Proposal 2. It is worth flagging up that Schedule 2 applies to pluralities (paragraph 22) as well as MPBs.
Mike Todd, Lay Synod Member	(My comments below may betray a misunderstanding of the present position but I suspect that paras 60-66 use the term joint meeting in different ways and I am unclear which is which!) If there is any doubt about whether holding joint meetings and writing a single Statement of Needs is mandatory, I would want to make changes so as to make it a requirement that all parties to an appointment do so jointly. (Particular consideration may be needed when the benefice appointment is being made in conjunction with other responsibilities such as a diocesan post) Of course, there may be situations in which the parties find it hard to obtain a consensus especially about the Statement of Needs but I think that it is widely recognised to be very unwise to proceed with an appointment until such a consensus is in place. Of course, the Statement may include indications of 'special needs' (almost but not quite a minority report) but these should be set into a single coherent job and person spec. Without this, it falls to someone else to resolve the differences and to do so without proper transparency is not a great idea. Whilst this might run counter to the aim of expediting the process it is germane to making a good and durable appointment. In rural areas, many benefices now have many more than one or two parishes! Consideration should be given to the provision for two reps from each PCC as this can lead to unwieldy interview panels. Clearly this is not an easy matter to change as inevitably each parish wants to have their say, but we should be encouraging better HR practices by getting everyone to understand that the Statement of Needs and any other formal job/person spec is the place to do this and that an interview panel has an explicit duty to make the appointment in the light of these agreements. (Compare CNC processes) In my view the joint

	<p>meeting of all parties should elect a prescribed maximum number of reps to act on behalf of the benefice and any other parties.</p> <p>In particular, where a benefice has parishes of widely varying size, the present approach may easily lead to not getting the best people to be on the interview panel. Expertise may not be proportionately distributed across parishes.</p> <p>I recognise that some of this may be better dealt with under Guidance except for the possible requirement to involve all parties.</p>
Archdeacon of Bodmin	<p>Could there be some guidance as to how joint meetings of PCCs should be held and what procedures should be followed? Almost of necessity, the PCCs of multi-parish benefices are small and have little capacity – finding someone who is capable of arranging and chairing a joint meeting of 6-8 parishes can be challenging.</p>
Angus Deas, Pastoral and Closed Churches Officer, Diocese of York	<p>The proposals will greatly assist the planning and conduct of the process in multi-parish benefices and pluralities. They need to be the same as for single parish benefices.</p>
Niall Blackie Joint Registrar Diocese of Lichfield	<p>I appreciate that it would be difficult to resolve the problem within the present exercise. But there is a disconnect of comprehension about the presentation system and the practical way in which it works. Some ‘multi’ parish benefices involve 10 or more parishes, and they each tend to expect to have their 2 reps. They expect them to be on the interview panel. I cannot imagine anything worse than an interview panel of more than 3 or 4 people. Of course the interview process is nothing to do with the presentation system (!) but for my part I would suggest that the present ability to have 2 representatives per parish should be removed and that the parishes should jointly decide on 2 representatives between them in all situations. One for another day, I fear!</p>
Neil Parsons, Chapter Steward Norwich Cathedral	<p>Yes</p>
Caroline Mockford Registrar of the Province & Diocese of York for and on behalf of Lupton Fawcett LLP	<p>67. Given that the proposed amendments to the Church Representation Rules will make provision for more effective joint PCCs, I suggest that the legislation makes explicit the way in which the Measure will apply in such cases. More generally, I find that the provisions of Schedule 2 to the Measure to be effective. However, the Schedule can be difficult to follow, given that it involves the substitution of certain words in various sections. Perhaps understanding of the requirements would be improved if:</p> <p>67.1 the relevant sections of the Measure contained a cross reference to the provisions applying in the case of a multi-parish benefice; and</p> <p>67.2 the provisions as they apply in relation to a multi-parish benefice are set out in full, either in the Schedule or the proposed guidance.</p>
David Jenkins Archdeacon of Sudbury	<p>in many rural multi parish benefices the number of parish reps is cumbersome and unhelpful. Also there is a need for training for this key role.</p>

The Revd J C Hugh Lee, Synod Member	Some guidance could be given on how to appoint a secretary to any joint meeting of PCCs in any benefice where there is more than one PCC, and what that secretary should include in the minutes of such meetings.
Jane Lowdon	Clarification on the position of team councils and formally constituted joint PCCs in relation to the workings of the Measure.
The Venerable David Bailey Chair – Simeon’s Trustees and Hyndman’s Trustees	<p>We accept the interpretation of the Measure given in the consultation document and agree that it is not widely known or understood.</p> <p>1. In particular, more often than not we find that parish representatives are chosen by the individual PCCs and those choices are received, and in some cases ratified, by the joint Section 11 meeting. After careful consideration we feel that this is, in fact, to be preferred. We are uneasy about the individual PCCs being represented by members not of their own independent choosing. If the Measure at present is correctly interpreted there is a possibility of the other PCCs outvoting an individual PCC in the choice of a representative from among its number. Further, the whole procedure is imbalanced by the variation in sizes of the individual PCCs which might not reflect the size of the congregations or electoral rolls. We would prefer to see parish representatives chosen by their own PCCs and reported at the joint meeting. It would, of course, be possible for the meetings to happen consecutively on the same occasion. The joint meeting can adequately fulfil the other requirements of the Measure.</p> <p>2. We feel that there is an issue about the <i>number</i> of representatives in multi-parish benefices that can impair efficiency. The Code of Recommended Practice to the PBM (issued many years ago and not available for some time) suggested:</p> <p>Number of parishes Number of Representatives</p> <p>2 2 from each (total 4)</p> <p>3 Either 2 from each (6) or 2 from one and 1 from each of the other 2 (4)</p> <p>4 1 from each (4,5 etc)</p> <p>We would suggest that this be restated in future guidance, although the imbalance offered as an alternative for 3 parishes should only be used in cases where there is clear imbalance in the size of electoral roll or congregation.</p> <p>3. There is some confusion in the reference in Para. 65 of the consultation document to a ‘joint meeting’. This is presumably the Section 12 meeting and not the joint Section 11 meeting. No doubt this can be made clear in any future iterations.</p>
Archdeacon of Berkshire	<p>This is actually quite a complication for large MPBs. Finding a venue for a meeting which might have 8 or more PCCs in it and a time when all can make it is no small task.</p> <p>In practice the statement of need (parish profile) is never ‘prepared’ by the joint meeting or even by a whole PCC. It is prepared by a small sub group in consultation with the parish, so this expectation is hopelessly unrealistic. Even the task of getting 80+ people to discuss and agree a joint document at a meeting is only possible if considerably consultation has been done beforehand.</p> <p>Asking the same 80+ people to agree on the choice of parish reps who they may not even know (without suggesting a process by which this might be done) is silly. And it doesn’t happen like this in practice.</p> <p>Also consider the complication of one of these parishes wishing to write a letter of request concerning the ministry of women, and you have a recipe for WW3. If the process stays as is, I would prefer to see flexibility introduced here. This joint meeting may suit smaller MPBs, but larger ones may operate naturally in</p>

	<p>clusters, with some parishes unwilling to collaborate, and it would be helpful if the wording allowed for either single, or cluster or who benefice meetings to conduct this part of the process.</p> <p>But a better idea might be to fully recognise the complexities and variations in both formal and informal governance in MPBs and write the rules in such a way that they work with the reality rather than imagine it to be otherwise.</p> <p>Trying to organise a S.12 meeting for a large MPB is bad enough!</p>
The Revd Paul Benfield Diocesan Registrar of Blackburn	I am not aware of problems occurring with multi-parish benefices EXCEPT that the forms sent to PCC secretaries (eg Form 34) do not adequately reflect the rules in Schedule 2 to the Measure and cause confusion or mistake with each PCC attempting to appoint more representatives than it should. A revised Form 34 for use in multi-parish benefices would be helpful.
Simon and Sharon McKie	It is very disappointing that the considerable difficulties which the 1986 Measure poses for benefices consisting of more than one separate parish ³⁹ should be tacked on to the end of the proposals as an afterthought and that there are no specific proposals to take account of the very different needs of multi-parish benefices from those of benefices which consist of a single parish. ⁴⁰ It demonstrates that these proposals have not been thought out carefully. It seems likely that that was the result of the decision to make them by means of the truncated procedure provided by the Legislative Reform Measure 2018.
Archdeacons of Ludlow and Hereford	In a MPB with, say, nine parishes, there is the potential to have eighteen parish representatives. This makes for an unwieldy process, to say the least. We would welcome a process for limiting the number of parish representatives in such circumstances, without removing the entitlement for each parish to be represented. There could, for example, be a procedure whereby parishes could agree to be jointly represented if they wished; and there could be provision for benefices with more than a certain number of parishes to have only one representative each.
James Hall, Solicitor and Diocesan Registrar	<i>should there be a cap on the other rural number of parish representatives? If every parish is allowed to have two, interview meetings with potential candidates can be very cumbersome. This could be assisted by limiting each parish to one representative</i>
Forward in Faith	In benefices where one or more parishes have a resolution under the HoB Declaration and one or more parish does not, the facility for separate preparation of the statement describing the conditions, needs and traditions of each parish should remain available, if requested, as a means of ensuring each PCC can fully express the needs and theological conviction of its parish.
Helen Dimmock, Crown & Lord Chancellor	The administrative issues related to multi-parish benefices are much wider than those related to the appointments process. My experience has shown that the joint meetings to develop and agree the Profile may be the first time that members of the benefice have met each other. They are a useful precursor for working together under a new incumbent but can also test whether the "job" being advertised is actually doable in terms of the personalities and places involved. I think there is probably a different piece of work needed, which may already be under way, to look at the scope of these roles in relation to the clergy care and wellbeing covenant.
Shirley-Ann Williams, Exeter DBP	It would make good sense for the discussions to be held with all parishes at the same time. This could avoid a 'Chinese Whispers' situation and also give a sense of more co-operation between the parishes. Where there are many parishes a suggestion that fewer than 2 parish representatives per parish would be a

	sensitive although practical one. I was once involved with 24 reps and also 7 historic patrons who, although with no voting right, insisted on being at interviews plus the Bishop and archdeacon, these latter of course, being necessary, so it was a nightmare particularly for the candidates!
Diocese of Liverpool	We recognised the argument made in sections 60-66 relating to multi-parish benefices. Nonetheless, the appointments process in such benefices has been found to be the most burdensome of all. The numbers of parish representatives can be excessive, even if one only from each parish, and the requirement in default for the churchwardens to appoint five of their number is unduly restrictive (because the churchwardens are not necessarily the right people to appoint and because five is still too large a number!). We would like to see a process which ended up with a norm of two (or perhaps four as a practical maximum) PCC representatives however large the benefice. This could perhaps be achieved by each parish appointing its representatives and then that group of representatives having the power to appoint two of their number to act. This is already our practice, for example, when PCC representatives form part of an interview panel in large benefices.
Diocese of Leeds	When there is a vacancy in a multi-parish vacancy, we encourage those parishes to work together to produce a joint statement and hold joint meetings as this brings the whole benefice together to work as one.
Chris Gill, Lay Chair of Deanery Synod	I am surprised the meeting described has to be a joint meeting, as that is not my experience, but it would be a significant improvement!! Allowing each of the Parishes to prepare a Parish Profile is an absolute nightmare and just shows why two Parishes should not be working together
Oliver Home Diocesan Secretary, Bristol	We have no specific comments here. Dioceses with a large proportion of multi-parish benefices will be better placed to comment.
Hilary Tyler, the Diocesan Registrar, Portsmouth	We have not experienced any problems with the present provisions relating to multi-parish benefices and have found the Code of Practice provides the extra detail needed to deal with any queries which may arise.
Darren Oliver Registrar and Sara Leader Registry Patronage Manager, Diocese of Oxford	We assume that this will be coherent with current proposals of joint PCCs in the revised Church Representation Rules.
Oxford Diocesan Mission and Pastoral Committee and the four Archdeaconry Mission and Pastoral Committees of	There was universal agreement that it would be beneficial for improvements to the provisions for multi-parish benefices be considered, with a suggestion that this could be incorporated with the proposed changes to the legislation (pending further consultation, as necessary). Suggested points of consideration included: Appropriate consideration and guidance for multi-church parishes/ fresh expression and conventional districts would also be welcomed. Detailed guidance would be welcomed on how to appoint a secretary to any joint meeting of PCCs in a MPB and what should be included in the minutes.

Berkshire, Buckingham, Dorchester and Oxford.	<p>Parish Representatives should be chosen by separate PCCs individually and not at the joint PCC meeting, so as to avoid potential underrepresentation in one or more parishes</p> <ul style="list-style-type: none"> • The joint meeting should be of representatives of each PCC to prevent numbers becoming unmanageable. • The statement needs to be collaborative with individual sections on each parish prepared by PCCs, while the joint meeting should be responsible for the overall benefice picture. • Consideration should be taken to ensure a fairer weighted system of representation be established to reflect a benefice comprises of different sized parishes, with larger churches having more representation. Possibly basing this on the regulations regarding Deanery Synod representation and or ER figures.
Sheffield Church Burgesses Trust	<p>The Trust has some experience of this. Whilst it can be a rather clumsy process producing documents from more than one Church Council, the use of single meetings has been de rigueur in the Diocese of Sheffield for many years already.</p>
Christopher Whitmey, PCC member Hereford	<p>In my personal experience of 3 vacancies in this multi-parish benefice matters seemed to work well. When the original measure was drafted I got parish reps amended from one to two ! But appreciate with the proliferation of multi-parish benefices this had to be changed.</p>
Diocese of St Albans	<p>[para 60] We are disappointed no proposals have been included under this heading. We disagree that the issue is simply that the existing provisions of the Measure are not adequately known or understood. The main provisions of the Measure, especially affecting the appointment of parish representatives in multi-parish benefices, are affected by a number of other legal provisions, particularly:</p> <ol style="list-style-type: none"> a. <i>Schedule 2 to the Measure</i> for multi-parish benefices b. <i>The Church Representation Rules</i> c. <i>The Mission and Pastoral Measure</i> and its <i>Schedule 3</i> relating to appointments in multi-parish team ministries with or without an operating team council. d. <i>The Miscellaneous Provisions Measure</i> clarification about appointments of team vicars by a patronage board, in a multi-parish team with a team council. e. In addition, the provisions for <i>Crown appointments</i> have been amended more than once and the <i>Clergy Terms of Service Regulations</i>, the <i>House of Bishops Declaration on the Ministry of Bishops and Priests</i> and the amending legislation providing a shortened procedure where a <i>Priest-in-Charge is appointed</i> as incumbent are relevant to parts of the process. <p>[para 61-63] The process for parishes in a multi-parish benefice to hold a joint meeting and take joint decisions is not clear in practice and more detailed guidance is needed:</p> <ol style="list-style-type: none"> i. What provision is there for one PCC Secretary to act as a lead for correspondence and notify the Designated Officer? How should the Designated Officer communicate with that person? ii. Where there is a team council, what legislation requires the team council to appoint a secretary and to notify the diocesan office (in particular the Designated Officer) of that person's contact details?

	<p>iii. Is a single Form 34 to be used (in which case more spaces are needed for parish representatives' details)? Is it to be copied to all the PCC Secretaries?</p> <p>iv. Does the provision for PCCs to act jointly conflict with the guidance in the House of Bishops' Declaration that a request to the Bishop is made by an individual PCC?</p>
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Guidance

Mike Todd, Lay Synod Member	<p>Is it mandatory to follow the Guidance similar to the way in which Codes of Practice are mandated in other bits of legislation?</p> <p>Could the Guidance include a requirement to involve diocesan HR in each appointment? For the most part, parish reps are not experienced in up-to-date best practice and may benefit from professional input (I know that to some extent Archdeacons are expected to provide this but perhaps it is better to have the HR considerations stated independently of the many other factors in an AD's mind)</p>
Rev Katherine Price, Chaplain, Queen's College Oxford	<p>We welcome the proposal to produce updated guidance on appointing incumbents and priests-in-charge, and in particular the presumption that role descriptions and person specifications should be produced for every post. We have noted that some dioceses involve patrons fully in the appointment of priests-in-charge, and we would endorse this approach, as it is very difficult (in fairness to the post-holder) for the patron to exercise any real input or scrutiny over the appointment of an existing priest-in-charge to the incumbency once the suspension is lifted. Some dioceses also involve patrons in the appointment of Team Vicars with oversight of the parish historically in the gift of the patron, when the amalgamation of parishes into a joint benefice has given rise to shared patronage. Again we welcome this practice, as it strengthens the link between parish and patron, and gives us greater insight into the context of those benefices in which we exercise patronage. Guidance on the operation of patronage boards would also be valuable, for instance whether they make decisions by majority vote.</p>
Simon and Sharon McKie	<p>It has become an all too common practice for the Government to introduce inadequately drafted new legislation and to attempt to correct its inadequacies by the provision of 'guidance'. It is important that the draftsman of ecclesiastical legislation should not follow this lazy and dishonest practice. Guidance can be useful in providing advice based on common experience on how to implement arrangements governed by statutory procedures. It should not, however, be seen as a substitute for properly and accurately drafted legislation.</p>
Darren Oliver Registrar and Sara Leader Registry Patronage Manager, Diocese of Oxford	<p>It would certainly helpful to receive revised guidance in relation to the Measure and the proposed amendments. The present Code of Practice is helpful to a point but will obviously become more outdated if the proposed changes come into force. Guidance on the appointments of priests-in-charge, disagreements, etc., will certainly be of great assistance.</p>
Diocese of St Albans	<p>1. We consider it is vital that there should be an on-line Code of Practice and template forms, including appropriate variations of forms for multi-parish benefices, team ministries and crown appointments. The guidance should set out the process clearly, taking account of the parallel appointment process that</p>

	<p>will be going on in most cases; the effect of other legislation on each part of the process; and other processes that may be relevant to a particular benefice: suspension of presentation or appointment to an Interim Post or other Regulation 29 appointment.</p> <p>2. We would suggest the guidance should include a flow-chart and attach for reference the version we currently use.</p>
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Other Comments

Archdeacon of Norfolk	<p>Generally speaking, my one significant regret is that the proposals do not go far enough. I appreciate that there are many vested interests but by far the most cumbersome and unhelpful aspect of the process is Patronage itself. My ideal would be to see a system whereby the Bishop takes the lead alongside (obviously) the benefice, and the Patron is consulted, but loses the right of veto and is not allowed to drive the system. I say that having seen many patrons take the lead (sometimes very unhelpfully) at a vacancy and then have no contact or interest in the benefice or local mission and ministry, until the next vacancy arises. Even the 'better' patrons bring very little other than increased bureaucracy and demands made by them rather than genuinely assisting the parishes to seek the priest they themselves (who will have to work with him/her for many years) want or need</p>
Rev David Keen	<p>My context is a 2-church parish in the Diocese of Bath and Wells, our patron is the Bishop. We have recently been through 2 appointment procedures, one for the Vicar of the parish (the previous Vicar announced his retirement 6 months before leaving, but the PCC was not permitted to begin the process until he left). I was Associate Vicar, and was appointed as Vicar 9 months after his retirement. We then needed a new Associate Vicar: with an up to date parish profile already in place at the start of the process it has taken from May 2017 until this month to actually make the appointment. There are 2 main reasons for the delay a)No responses to our advert first time around b) delays in fixing dates for adverts, application deadlines, and interviews due to lack of diary space from senior clergy and procedural delays.</p>
Mike Todd, Lay Synod Member	<p>Could the declaration of the patron (see para 14 (c)) be made part of the patronage register so that it is on record at the start of the process and that the current step be removed? This might mean giving the patron to appoint a representative at any stage subsequently which might on occasion be helpful to expedite the timetable if the patron is not readily available.</p> <p>Could the Section 12 Meeting be extended to permit eg an Archdeacon or other to represent her/him? This could be helpful with overfull diaries?</p> <p>Whilst Para 14 (g) notes that the process of selection is not defined in the Measure, it seems that the appointment could proceed without the parish reps having met the candidate. Should this not be required? (OK so the reps could veto if it is proposed to proceed without interview but that feels a bit of a sledgehammer)</p>
The Venerable Alastair Cutting	<p>We were discussing appointments locally recently, and were pondering the nomenclature around the Form 30, or Notice of Impending Vacancy.</p> <p>This form is often sent some time after the vacancy has actually taken place, to allow preparation on the parish profile, or conversations within the deanery or</p>

<p>Archdeacon of Lewisham & Greenwich</p>	<p>the benefice to take place etc, so the form arriving at a late stage with sort of 'Impending Vacancy' title feels like it is late to arrive at its own party.</p> <p>The form is much more to do with Notice of Filling a Vacancy; or Notice to Appoint a Priest, and such nomenclature would be more accurate and indicative. A minute point in your over all considerations...</p>
<p>Caroline Mockford Registrar of the Province & Diocese of York for and on behalf of Lupton Fawcett LLP</p>	<p>In my experience, the provisions of the Measure in respect of which the proposals are made more or less work, albeit in a rather muddled way at times. Where the process does seem to go to pieces is once the preferred candidate is identified and everyone becomes very excited. The steps required by s13 are:</p> <ul style="list-style-type: none"> a) the patron notifies the bishop and the PCC requesting approval of the making of an offer to the chosen candidate b) the bishop and PCC give their approval to the making of an offer c) the patron makes an offer to the chosen candidate d) when the offer is accepted, the patron presents the candidate to the bishop <p>I do wonder about the extent to which the formal process set out in s13 is conflated, especially where the diocese manages the appointment process on behalf of the registered patron. Certainly, it can be a battle to allow sufficient time for the bishop's notice of intention to institute or collate to be given to the PCC Secretary and displayed for the periods laid down in s19. I would like to see consideration given to this aspect of the process and for it to be updated to reflect the requirements of safeguarding policy.</p>
<p>The Church Pastoral Aid Society (CPAS) include the Martyrs Memorial and Church of England Trust The Church Trust Fund Trust The Church Pastoral Aid Society Patronage Trust.</p>	<p>The CPAS Patronage Trustees wish to offer PCCs in multi parish benefices the freedom to elect less than two parish representatives at Section 11 meetings if they wish to do so. This would help restrict interview panel size where there are multiple parishes. This facility should be an option and not be imposed. The CPAS Patronage Trustees also take the opportunity to note that often interview panel sizes are swelled by the presence of non-statutory parties such as rural/area deans, lay chairs from deanery synods and archdeacons (unless they are representing the bishop in a formal capacity).</p> <p>While these proposals endeavour to amend the formal structures of the process to handle and fill parish vacancies, the (CPAS) Patronage Trustees take the opportunity to remind PCCs of other ways to offset the 'particularly onerous obligations imposed on PCC Secretaries' (referred to in para 15) The Annual Parochial Church Meeting (APCM) and the first PCC following is the yearly occasion for appointing or reappointing both Church Wardens and PCC Secretaries. The APCM is a good opportunity for a reminder that Wardens and PCC Secretaries have particular responsibilities, and even potentially legal roles, in the event of a vacancy, for which they should be aware and in general be prepared by having a working knowledge of the processes and responsibilities. Such reminders and outlines could equally be part of the annual Archdeacon's Visitation and 'Swearing in' of Wardens. It is suggested that such foreknowledge is both prudent and good practice. One ingredient in the process is the production of a Parish Profile. PCCs could be encouraged to consider a regular pattern of informally revisiting and 'up-dating' their Parish Profile, irrespective of whether there is an actual or anticipated vacancy or any legal requirement.</p>

	<p>Many parishes have benefited immensely from such three-yearly or five-yearly reviews and have built them into their Strategic or Mission Action Plans. Equally, most vacancies are anticipated by a good few months before any specific timescales are initiated (eg announcements of retirement or of new appointments), and there is every opportunity for PCCS, knowing in advance the basic shape of what is required to handle and fill a vacancy, to begin the processes informally, especially establishing a template and gathering material for the Parish Profile. Such sensible and responsible forward thinking would offset the sense of 'onerous obligations' that the few might otherwise feel.</p> <p>Summary: The CPAS Patronage Trustees recommend as prudent and good practice the use of the APCM (and first PCC thereafter) and the annual Archdeacon's Visitation as occasions to inform and remind Officers of the PCC of their responsibilities to be prepared for the eventuality of any vacancy and to have a working knowledge of the processes. Wardens and PCC Secretaries are also encouraged to make the very best use of the time given from the moment a vacancy is known to be coming and before the more formal time-scales are set in motion to begin whatever informal thinking and preparations are necessary and helpful</p>
The Revd J C Hugh Lee, Synod Member	<p>There are three different issues that need to be addressed:</p> <p>Firstly, careful consideration needs to be given to whether to change the whole procedure so that, as soon as it is known that a vacancy for an incumbent is going to arise, the process is started immediately with the intention that a new incumbent is appointed before the outgoing incumbent leaves and either there is no period of vacancy (commonly erroneously called an 'interregnum') or it is kept to a minimum. Some benefices thrive during a vacancy but in others the mission of the church is seriously hampered when there is no incumbent.</p> <p>Secondly, guidelines need to be issued explaining that new incumbent should, wherever possible, meet the previous incumbent for a 'handover' however long or short the vacancy has been. The guidelines should explain what should be included in such a handover. Parishioners often assume that there has been a handover and that appropriate information about them and about the benefice has been passed on to the new incumbent. Church wardens can often help with such a handover but they are no substitute for an incumbent to incumbent handover.</p> <p>Thirdly, guidelines need to be issued on how any licensed ministers (including self-supporting clergy, licensed lay ministers and youth workers) in the benefice should be included in the appointment process.</p>
Bishop of Willesden Pete Broadbent	<p>The LRC should also take the opportunity to update anachronistic terminology (e.g. "Parish Profile" for "Statement of Needs, Conditions and Traditions.")</p> <p>This Measure needs much more radical reform, but this would require action under a fuller synodical procedure.</p>
James Hall, Solicitor and Diocesan Registrar	<p>Has any thought been given to the value and effectiveness of diocesan boards of patronage and whether there is really a need for them?</p>
Revd Chris Leslie. member of the Oxford Diocesan Board of Patronage for	<p>The consultation does not seem to allow for other matters than the above to be considered.</p> <p>However my experience with the Measure has convinced me that there are a few other minor changes to the Measure which would, in my opinion, help in <i>'removing or reducing burdens that result from ecclesiastical legislation'</i>. I</p>

18 years, 12 as Chairman	<p>believe that they would be covered within the restrictions applied by Legislative Reform Orders. I therefore put a few down below for your consideration:</p> <p>Suggestion 1 Schedule 3 §1(1)(b) restricts the clerical membership of a Diocesan Board of Patronage (DBP) to those '<i>beneficed in or licenced to any parish in the diocese</i>'. This ignores a huge potential resource (eg. clergy with '<i>Permission To Officiate</i>' (PTO)) while, at the same time, creates a burden in that appointing clergy to a DBP can be very difficult, for two reasons:</p> <p>a) Clergy are, with increasingly large benefices to serve, very busy and therefore reluctant to take on other roles; and</p> <p>b) They are usually elected after some years in their tenure, and therefore often move on before the end of a 6 year appointment.</p> <p>Allowing the election of those with PTO and suitable experience would greatly enhance DBPs and could be achieved by a minor change of wording to this section of the Measure.</p> <p>This would reduce the burden of appointing members to a DBP</p> <p>Suggestion 2 Schedule 3 §1(1)(c) unlike the previous section does not put any requirements on lay membership of a DBP. I suspect this was a drafting oversight, which, potentially, allows lay members of another diocese to be elected, or, even worse, non-Christians!</p> <p>Inserting the words '<i>communicant member of a benefice within the diocese</i>' would resolve this and reduce the potential burden of having an 'outsider' on a DBP.</p> <p>Suggestion 3 Dioceses vary greatly in size. Oxford has 4 archdeaconries, several of which are larger than some other dioceses! The diocese is also geographically large. The electoral process does not allow for ensuring that members of a DBP are reasonably spread in the diocese. This causes burdens in that if a DBP is not geographically spread over a large diocese then the burden on the members is greatly enhanced, for example, in travel time.</p> <p>But equally this would not be an issue for the smaller diocese. So I would suggest that a proposal be formulated to allow a diocese, <i>if it so wished</i>, to place a geographical element into the election process for members of their DBP.</p> <p>Suggestion 4 Arising somewhat out of the Suggestion 3, the size of a DBP is the same for a diocese regardless of its size. It might be sensible to allow some variation of size of a DBP. This would allow a smaller diocese to remove the burden of finding the eight members; but at the same time allow the larger diocese to lower the burden on the individual members.</p> <p>Suggestion 5 As it stands the Measure allows no option of a DBP having a secretary or clerk. For a busy DBP the absence of such a post increases the burden on its members.</p>
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	<p>Encouraging dioceses to appoint such a person would surely have a positive effect on all DBPs.</p> <p>Suggestion 6</p> <p>At some time in the past the Central Board of Finance of the Church of England produced a very useful document '<i>Patronage (Benefices) Measure 1986 Code of Practice. The exercise of Rights of Patronage</i>' (undated).</p> <p>One section of this document is §74 which deals with the appointment of parish representatives in multi-parish benefices, where the number of representatives under the two per parish rule (§11(1)(b) of the Measure), makes interviewing panels potentially very large.</p> <p>The Code of Practice suggests that, if there are two parishes, there be two representatives from each (making 4); three parishes, either two from each (6) or two from one and one from the others (4); larger numbers one from each. While this is just in the Code of Practice it can be hard to persuade parishes to reduce their numbers, so it would seem sensible to make this provision part of the amended Measure to reduce the burden of oversized interview groups. This would bring it in line with the objectives of Proposal 5.</p>
<p>Teresa Sutton Lecturer in Law, University of Sussex</p>	<p>I am submitting this response to the Consultation 'as another person interested in the operation of the Patronage (Benefices) Measure 1986' under para 70. I am an academic at the University of Sussex and have recently completed a study on the advowson as a property law right and the role of patronage in the Church of England. Whilst the bulk of my work concentrates on the viability of the substantive right, my study has also given rise to some observations about the procedural operation of the Measure which may be of relevance to the current Consultation.</p>
<p>Shirley-Ann Williams, Exeter DBP</p>	<p>The Board has always held to the principal of not appointing for the sake of appointing as to do this could be a disaster both for the parish and the clergy person concerned. We have always taken great care to fulfil our responsibilities as well as possible.</p> <p>As a personal comment: it is not a bad thing to have a vacancy of 6 or more months. During a vacancy memories can be allowed to fade..both good and not so good! So the new incumbent can start with a fairly clean slate. It can give the parish the opportunity to 'crawl out of the woodwork', (I quote a parishioner!) as where lay people were not given much opportunity to do more than very secular tasks they had the chance now to broaden their service to the church and to develop not only their own talents but to encourage others. This of course is not the case in all vacancies as in many the laity have been encouraged to take a full part in the life of their church. Where I now worship we have teams of laity assisting our clergy in all tasks that are permitted for the laity. As Lay chair of my Deanery I recently led discussions on Setting God's People Free and we are encouraging the suggestions made there to be taken up. In my deanery we have clergy who have responsibility for 6 or more parishes and we are not alone in this!</p> <p>Many years ago I was in a parish where the clergyman retired on the Saturday evening and because we were being put together with another parish the next incumbent was in situ the following day. The retiring clergyman was a Matins each week with Communion only once a month man. The new person was starting the next day..a Sunday..with a Communion service. At the Saturday evening service the retiring clergyman paced up and down the aisle ranting and</p>

	<p>literally swearing about this new person. He did this frequently when he disagreed with not only church but political matters. At the previous PCC meeting the Churchwardens told us that they did not want the new man and that they had visited him and asked how much he would take not to come. He refused such an offer. This is an extreme example but the new suggestions could mean that such an occasion would not arise in future. Many years and several incumbents later I am told that the parish is now in good time heart.</p> <p>Please excuse this rather long preamble. I will now refer to the questions asked in the consultation in a separate paper.</p>
Diocese of Liverpool	<p>In general terms we warmly welcome the proposed changes. Our experience is that the appointments process can sometimes be unduly burdensome, because of its (i) complexity and (ii) inflexibility, and we welcome attempts to relieve this. This can particularly be the case where, for example, PCCs and some patrons who are only infrequently involved in patronage are concerned.</p> <p>In practice it has not in every case been possible to meet the requirements of the current process, and where this has been so the way we have proceeded in the Diocese of Liverpool has been similar to the new procedures suggested.</p> <p>We are aware that every diocese has its own circumstances, and that different dioceses may have different needs. (So we welcome, for example, the proposed flexibility about timing in Proposal 2.) In the Diocese of Liverpool, for example, we generally have small numbers of candidates for any post (but only rarely serious long-term difficulties filling a post), a relatively high proportion of internal candidates for posts, and a relatively high proportion of patronage held by trustees who are local church members. We also have increasing numbers of posts which are non-traditional, e.g. interim posts or posts where a parish is combined with a deanery responsibility. We also have increasing numbers of parishes where the future of the parish or post is genuinely unclear, especially at the time of vacancy. All these factors colour our feedback.</p>
Simon and Sharon McKie	<p>A number of wide ranging suggestions were made, noting that these were outside the scope of this consultation. It was said that it is not appropriate to amend the 1986 Measure by use of the Legislative Reform Measure 2018 procedure but rather that the 1986 Measure should be repealed and replaced by an entirely new measure.</p>
Chris Gill, Lay Chair of Deanery Synod	<p>Is it in the Committee's remit to consider who can and who can't be a Parish Representative? I think this is an area which often causes confusion and probably requires clarification to provide consistency. If we are going to exclude, for example, licenced people, we need to be clear about what that means and why it is being done and if it is consistent to apply it to everyone in that group. We also need to be clear about people who we wouldn't expect to stand, but sometimes do because they are not specifically excluded, for example family of any previous incumbent</p>
Anthony Jennings, on behalf of the English Clergy Association, the Patrons Group, and	<p>We believe the bishop's vacancy notice proposal for section 7 still does not go far enough. We propose that there should be a one month notice period running from the time the bishop first hears about an impending vacancy, not just from the day of the vacancy itself. That is surely in all our interests in helping to speed the process and reduce vacancy periods.</p>

<p>Save Our Parsonages</p>	<p>We propose that once the bishop is aware of the vacancy he/she also gives notice through the designated officer to all the relevant parties of a Vacancy Meeting. At the Vacancy Meeting the formal legal steps can be discussed and a timetable drawn up of actions/meetings needed. This will establish the various parties' responsibilities and agreement can be reached on the appropriate policy for the vacancy. By way of explanation, we think that putting the section 11 meeting before a section 12 meeting is putting the cart before the horse as PCCs are having to make decisions about the sort of person to be appointed and the nature of that appointment before they are fully aware of the practical options open to them and the needs of the diocese so that in many important respects the section 11 meeting takes place in a vacuum. It seems to us that if there is a Vacancy Meeting with the archdeacon or other diocesan representative then a section 12 meeting would rarely be necessary as the PCCs are making their decision in the section 11 meeting with the full knowledge of the needs of the diocese. A reasonable procedure would be for the patron and the bishop to discuss the appointment in the light of any representations made by the PCC as a result of the section 11 meeting. This would also include who is to be responsible for the advert, what should the advert contain, what is the timeline for the appointment, the procedure for interviews etc. If the PCC is unhappy with the outcome of such discussions, e.g. because of an insistence by a patron as to a certain form of churchmanship with which the PCC was not sympathetic, there is still the possibility of convening a section 12 meeting at which both the patron and the bishop (or representative) would be present and the PCC has the right to reject. There would be adequate time for a Vacancy Meeting before the section 11 meeting within a six-month period.</p> <p>We draw attention to the fact that we have had no feedback on our earlier proposals for simplification of the procedural provisions of the Patronage Measure to make it less onerous for private patrons (my email of 29.11.2016 to Jacqui Philips has our comments attached - please let me know if you need a further copy). We have a lot of experience of the difficulties private patrons tell us they have in understanding the procedural complexities of the Measure.</p>
<p>Oxford Diocesan Mission and Pastoral Committee and the four Archdeaconry Mission and Pastoral Committees of Berkshire, Buckingham, Dorchester and Oxford.</p>	<p>The Diocese is generally amenable to the amendments to the Patronage (Benefices) Measure 1986 as presented in these proposals and views that the extended timeframes and simplifications it sets out would assist particularly in the careful management of complex vacancy situations, as well as reducing some of the administrative burdens of PCCs.</p> <ul style="list-style-type: none"> • We would wish to note also, however, the merits of the tighter time frames of the existing provisions for standard vacancy situations, which in our Diocesan experience are, in usual circumstances, both effective and manageable and that there is some concern that the changes could result in the process of filling a vacancy being extended unnecessarily. • We welcome careful and clear guidance through a revised Code of Practice indicating the impact of timing on the process of filling a vacancy on with the recommendation of how the provisions could be implemented in a 'best practice' scenario as well as how it can be used in more complex situations. • The use of accessible language should be considered in the drafting of any amendments as it was universally felt that good communication of the process is key to a vacancy being filled successfully. • It would be beneficial for improvements to the provisions of multi-parish benefices to be also considered.

<p>Bishop of Leicester and the Bishop's Leadership Team</p>	<p>While welcoming the desire to loosen up the rigid system which exists under the Patronage (Benefices) Measure, overall we were disappointed with the timidity of the proposed reforms, which don't seem to reflect the reality of what is happening in our diocese. We take the view that the law should offer only the absolute minimum necessary of prescription.</p> <p>Could provision be made for the bishop to delegate their responsibilities to the archdeacon, who is the person leading on the appointment for the bishop in almost every case? As stated above, all prescribed forms of notice should be scrapped. An email containing the relevant information should be sufficient.</p> <p>In this Diocese we have in the last 18 months undertaken an exercise to recruit to 7 posts at the same time (all in the same deanery). This required considerable flexibility as some priests were applying for multiple posts. It was just possible to meet the necessary legal requirements in order to do so but any reduction of bureaucratic requirements which can be achieved in order to make such processes easier would be welcomed.</p> <p>In terms of compiling the parish profile, some churches will already have much of this information available on a website, even to the extent of a 'vision statement'. In such cases all that is really needed is a person specification and information about the house.</p>
<p>Archdeacon of West Cumberland, Richard Pratt</p>	<p>on behalf of all the Carlisle Diocese archdeacons. In brief, our views are:</p> <ol style="list-style-type: none"> 1. That the whole concept of patronage is archaic – especially with its status as personal property which can be bequeathed. 2. That the process of engaging with patrons – with its default position of paper forms and letters – adds a level of extra work; even to find email addresses or even phone numbers can be difficult. 3. That as multi-parish benefices become more the norm in rural dioceses, and larger, and hence with multiple patrons, interview panels can become unwieldy. 4. That local patrons when active church goers, or careful corporate patrons, can sometimes add some value, or even be seen as a useful check against episcopal/archidiaconal overbearing; but external patrons who don't really know the local situation or understand diocesan strategy may sometimes be prepared to defer but this could not be taken for granted. 5. Our conclusion is that the fairly small scale reforms proposed may actually make things more complicated (a new system to learn) – and so we favour either scrapping patronage completely (our preferred option) or leaving it alone for now with a plan to abolish it altogether as soon as possible.
<p>Ian Blaney, Lincoln Diocesan Registrar</p>	<p>As additional matters I consider the following could do with attention:</p> <ul style="list-style-type: none"> • more clarification could be given in the Measure to what happens when a personal representative of a trustee transfers rights of patronage to someone other than designated in the late patron's Will or the residuary legatee as sometimes happens especially when the "heir" is unwilling to take the patronage. Under section 3(9) of the Measure a transfer by personal representatives is not required to be subject to the requirements of the rest of clause 3 (eg notice to the bishop) aside from using the correct form, but this exemption is presumably only intended

	<p>to cover transfers to a person named in the Will to take the patronage (which is rare) or the residuary legatee and not to a completely different person. I would suggest that in the latter case, it be made express that the inter-vivos procedure in clause 3 applies.</p> <ul style="list-style-type: none"> • Although it is not within the ambit of a legislative Reform Order I also think that it is time for a much more fundamental review of the Measure. From the registrar and designated officer viewpoint some aspects of the vacancy process and managing the Patronage Register are time consuming and problematic. Patrons have few of the obligations in the process -eg no obligation to advise the registrar of their updated address. • In dioceses where the registrar is not the designated officer, matters can end up falling between the cracks as it is unclear whose responsibility they are. Where the registrar is not the designated officer he or she can end up being asked to help as if he or she were, and may end up shadowing the functions of the person legally responsible for maintaining the Register and supervising the process. Possibly the registrar should be the designated officer unless there are exceptional reasons why this should not be so.
George Colville Diocesan Secretary – Diocese of Chester	<p>I would encourage the Legislative Reform Committee to repeal and simplify as much as possible. If we could use existing secular law where possible rather than having additional and separate ecclesiastical law I suspect a great deal of ecclesiastical law could be dispensed with. I do wonder whether more consolidation exercises bringing all the law into one place and removing anything no longer required are the way forward. It may be better to start again with what we really need as law rather than tweak what already exists. I think the Church has had a tendency to produce too much law (perhaps because General Synod can). We can always produce guidance instead if we think it is needed.</p>
Chapter of York	<p>The Chapter of York is committed to being a supportive, engaged and encouraging Patron, and gives a high priority to the welcome opportunities that its many patronage responsibilities create for it to be directly involved in the lives of the Benefices and parishes concerned.</p> <p>Chapter welcomes the Archbishops’ Council Consultation on the workings of the Patronage (Benefices) Measure 1986, and the timely opportunity this brings to review the structure and operation of the parish vacancy appointment process, noting the unfortunately onerous burden that the current process places on the pivotal role of the PCC Secretary, and the potential for the complexities of the current process to result in significant and, for all involved, frustrating delays.</p> <p>Chapter is grateful for the clarity of the welcome reassurance given by the Council in paragraph [9] of the Consultation paper that there are no proposals to change the substantive rights of Patrons, Parochial Church Councils or Bishops.</p> <p>In addition to Chapter’s responses on the detailed Consultation Questions and Proposals, set out below, Chapter proposes that a high priority is given to the production of the updated best practice guidance, referred to in paragraph [68] of the Consultation paper. An authoritative guidance resource, written in readily accessible ‘plain English’ terms and covering all of the issues referred to in paragraph [68] (including an explanation of the way in which the legislation is</p>

	<p>intended to work, assistance with preparation and agreement of role descriptions and person specifications, and guidance on the resolution of any disagreements) will be of particular value to PCC Secretaries who find themselves involved in their first appointment process, and will also ensure that the key working relationship between the PCC Secretary and the Designated Officer starts (and stays) on a fully informed and successful collaborative footing throughout the process.</p>
<p>David Lamming, Lay Synod Member</p>	<p>As someone who was a member of the Revision Committee for what became the Legislative Reform Measure 2018 (“the LRM”), I welcome the initiative of the Legislative Reform Committee of the Archbishops’ Council (LRC) in proposing changes to the 1986 Measure as the subject of the first LRO to be promoted under the LRM.</p> <p>I share the concern, prompting the proposals, that the current process for appointing a new incumbent to a benefice, following a vacancy, or the announcement of an impending vacancy, set out in the 1986 Measure and summarised in paragraph 14 of the Consultation Paper (“CP”), is prone to delay which, in the majority of cases is both unacceptable and, to most lay people, inexplicable.</p> <p>I make this submission, not only as a member of General Synod, but in my capacity as a member (and PCC secretary) of a church in a rural multi-parish benefice that is currently in vacancy. Accordingly, I have contemporary experience of the operation of the 1986 Measure. This experience includes the undue delay in commencing the process to which the CP refers.</p> <p>It may assist to set out the relevant dates in our benefice. I should explain, first, that the benefice was ‘in suspension’ during the 8-year term of the previous ‘rector’ (who I will refer to as ‘JS’), who was, strictly therefore, only the priest-in-charge.</p> <p>Timeline: 25 March 2018 JS announces that she will retire on 31 July 2018 (i.e. giving 4 months’ notice). The bishop had been informed, and was therefore “aware that the benefice [was] shortly to become vacant by reason of resignation...” [1986 Measure, section 7(2)]. 31 July 2018 JS retires. Benefice becomes effectively vacant. (“Effectively”, since the benefice is in suspension.) 17 August 2018 Archdeacon gives notice to the churchwardens, PCC secretaries and patrons that “following the retirement of JS on 31 July 2018 as Priest in Charge the benefice is currently vacant”, and stating that the Diocesan Mission and Pastoral Committee is recommending that “the suspension to this benefice should now be lifted.” 11 October 2018 Bishop lifts suspension. 17 October 2018 Designated officer sends formal notice that the benefice is vacant [the section 7(4) notice]. Archdeacon holds informal ‘pre-vacancy meeting’ with churchwardens, rural dean and deanery synod lay chairman. 12 November 2018 Joint ‘section 11’ meeting of the five PCCs. 14 January 2019 ‘Section 12’ meeting chaired by the suffragan bishop. Early February 2019 Advertising of the vacancy. 26/27 March 2019 Interviews.</p>

	<p>July 2019 Earliest likely date of induction of new incumbent.</p> <p>Since it is the Lord Chancellor’s turn to be the presenting patron, strictly the 1986 Measure does not apply, save in respect of the appointment and function of the parish representatives (see Crown Benefices (Parish Representatives) Measure 2010). However, the process is operating as if the 1986 Measure applied fully.</p> <p>It is apparent, therefore, that there will be a year’s ‘interregnum’ at least before a new priest is appointed as rector of the benefice and, of this period, 6½ months elapsed before the process to find a successor to JS even started. (25 March 2018 to 17 October 2018).</p> <p>It also appears to be standard practice in this diocese for the bishop not to send the section 7(2) notice to trigger the 1986 Measure process until the ‘old’ incumbent has actually left. I agree with the CP (para 18) that such ‘significant delay’ is ‘generally undesirable’.</p> <p>It is worth noting that when JS announced her impending retirement at the end of March 2018, a churchwarden in one the parishes (who is the CEO of a large public company) expressed surprise that the process to find her successor was unlikely even to start until she had actually retired.</p> <p>This delay is to be contrasted with the ‘breakneck speed’ with which the Diocese of Winchester is currently seeking to find a successor to Bishop Jonathan Frost as suffragan Bishop of Southampton on his appointment as the next Dean of York: see the letter, ‘Getting a move on’ in the <i>Church Times</i> on 11 January 2019, page 18, and my response published the following week (18 January 2019, page 16), in which I encouraged readers to respond to the consultation (Subsequent to the publication of my letter I received an anonymous postcard in which the writer suggested that the reason that incumbencies are not advertised quickly is “to save the Diocese money”, adding that this “seemed to be the case in Canterbury diocese.”)</p>
<p>Agnes Cape, Parishioner</p>	<p>have read with great interest David Lamming’s letter in this week’s Church Times in which he has asked us to write to you with our views. I, too am amazed how quickly archdeacons bishops are appointed in comparison with parish vacancies I ask that you to consider the congregation when there is a vacancy in a parish or benefice. In the parish in which I live we will soon have had three vacancies in three years as our present incumbent will be leaving us next month. The reasons for these vacancies have nothing to do with the congregation. And it is the congregation that suffer.</p> <p>First we lost our dear beloved Rector retired. It took nearly 18months before a new incumbent came due to the long drawn out process of appointment. The Rector left in February but we knew about his retirement in November the previous year. The advert was only put in the Church Times in September. It seems to me that the Archdeacon and others who were supposed to help to move things on dragged their feel on purpose. At least that is what it felt like. Meanwhile, the congregation with power struggle among the laity and lack of care meant the congregation started to lessen.</p> <p>No sooner did we get a new incumbent that she was ill for six months so it seemed like a prolonged vacancy. Then not long after the Team vicar went so</p>

	<p>here comes vacancy two which was also along drawn out process. That was a little shorter but it still took a year. Now the incumbent is leaving for her 'dream job'. So here comes vacancy three all in three years.</p> <p>In the midst of all this the congregation dwindled to less than a third. Too much change and disruption the faithful remnant almost despair. We just try to keep things going and hope for a better future.</p> <p>Why are parishes treated like this? Is the work of archdeacons and bishops more important than that in the parishes? Why are sheep left without a shepherd for such long periods? Jesus in his parable told us clearly what happens in this situation yet no one seems to care.</p> <p>I am appealing for reform of this system. Please do something.</p>
<p>Malcolm Dixon, Churchwarden, All Saints Church, Orpington</p>	<p>I write, encouraged by a letter from David Lamming in the current edition of the Church Times, as one who has had recent experience, as a churchwarden and parish representative, of the operation of the measure in practice. Mr Lamming's letter was in reply to an earlier one from Philip Johanson, contrasting the extreme speed with which the next Bishop of Southampton was being appointed with the arcane and very slow process which operates in the case of a parochial vacancy.</p> <p>Nearly two years ago, I myself had a letter published in the CT making a similar point to Mr Johanson, but comparing the very rapid appointment of the next Archdeacon of Tonbridge with the process operating in my own parish in the same diocese, where our then incumbent was retiring on exactly the same day as the previous Archdeacon. Somewhat embarrassingly, the CT published my letter some weeks after I had submitted it, but only 4 days before I was due to meet our Archdeacon to discuss the first steps in finding us a new Vicar. Our Archdeacon had seen the letter, but had not connected it with me. I was able to own up to being the author before he had a chance to say anything too insulting about my letter, but he did say that he had discussed it with the Bishop of Rochester and diocesan staff, and that they thought that the process and legal constraints were very different in the two cases. Too true they are!</p> <p>As we had had ample advance notice of our then Vicar's retirement, I was hoping to get the process moving well before he actually left, but I was frustrated at every turn. Our Archdeacon is a good and very helpful man, but he felt completely constrained by the requirements of the Measure, as interpreted by the Bishop and the Diocesan Registrar.</p> <p>In particular, our Vicar was formally retiring on 31st July 2017, but his last service was to be on 9th July, after which he would immediately be departing on holiday, using up his leave entitlement. We had a PCC booked for 19th July, just before many people went on their summer holiday, and I was hoping to use that date to hold the Section 11 meeting. But the authorities refused to issue the section 7 notice until after the vacancy formally began on 1st August, and then they had the cheek to ask if we would like them to delay the issue of the papers until after the summer holiday period had ended. We returned that suggestion 'with a flea in its ear' but, despite having the papers, were not able to get enough of the PCC together for the Sec 11 meeting until 3rd September. So a further month had been lost right at the start of the process, just what we had tried hard to avoid. And meanwhile, just to rub salt into the wound, the next</p>

Archdeacon of Tonbridge was announced in early May, nearly 3 months before the previous Archdeacon retired!

The present process is preposterous, and badly needs some reform. To take a somewhat analogous situation, the governors of a school would not wait until the previous headteacher had retired before beginning the process of finding a new headteacher, but rather would aim to have the next headteacher appointed well before the previous one's retirement, so as to make possible a smooth and efficient handover. I don't see any good reason why it needs to be different for incumbents. Furthermore, much of the detail of the present system is honoured more in the breach than in the observance. I and my fellow representative were not asked to complete the statutory form notifying the Patron that the preferred candidate was acceptable to us, nor did the Patron then notify the Bishop by completing the relevant form. It was all coordinated by the Archdeacon using email, and that could now be the norm, if the legislation allowed for it.

I am aware however that many dioceses, including mine, actually allow for a significant vacancy level when formulating their budgets, and would be financially embarrassed if the length of interregna were greatly reduced. Furthermore, the long-forecast reduction in the number of clergy available is already beginning to make itself felt, and a reduction in the length of vacancies would make that shortage more apparent. Some parishes would benefit, but others might have to wait significantly longer for their next incumbent.

I hope that this input has been helpful, and I wish you well with your endeavours. I hope for reform, but also hope not to have another interregnum during my period as churchwarden. One was quite enough!