

GENERAL SYNOD

Wedding Fee Waiver – Update

Summary

This paper is an update on work done toward implementing the Synod motion (DSM) from July 2023 which called for a regional trial in waiving wedding fees. Where the original motion called for a decision to scrap wedding fees nationally, which would have been straight forward although controversial, the amended motion called for a regional experiment to generate evidence in support of claims that a waiver of wedding fees would increase the number of church weddings and that donations could compensate for the loss of fee income.

After considerable work by the Faith and Public Life, Legal, Data Services and Comms teams, it has reluctantly been concluded that such a regional experiment cannot be designed in a way which could realistically provide the data intended and that attempting to do so would incur disproportionate effort, especially by the parish clergy, and cost. Alternative approaches to generating such data have proved to be dead-ends.

The Synod debate focussed largely on the moral question rather than the data question. It is therefore proposed that the question of the future of wedding (and other parochial) fees should be revisited in principle without relying on the kind of empirical data that Synod had hoped could be furnished.

Background

1. The original proposal to Synod was for a permanent national waiver of wedding fees, on the grounds that the fee was a disincentive to marriage, especially for poorer couples, and that an invitation to make a donation instead might raise more money. Instead, Synod passed an amended motion calling for a limited experiment to establish the potential impact of waiving wedding fees, as below:

That this Synod

- a) request the Archbishops' Council to design, fund and implement a time-limited, regional trial of providing weddings free of all statutory fees; and
- b) report back to Synod on the impact it made on the number of weddings conducted, pastoral and missional contacts made, on charitable giving in connection with provision of wedding services, and on projected parochial and diocesan finances.

Overview

2. During the Synod debate, it was suggested that the wedding fee deterred couples from marrying in church, especially in lower income communities, and that encouraging a donation instead of a fee might (taking the country as a whole) bring in an equivalent income. The amended motion was designed to generate data to support those claims.
3. Several speakers argued that charging any fee was a moral issue, the fee militating against the church's missional obligation to serve all couples. However, this moral argument was not embodied in the motion as passed and no amount of data is likely to affect the moral arguments.

4. Whereas a permanent national waiver of fees could be implemented once and for all, and the desired consequences would either follow or not, designing an experiment to provide data on the likely consequences is much more complicated.
5. Staff from Faith and Public Life, the Legal Office, Data Services, Finance and Comms have worked together to consider the design of such an experiment. We noted the following constraining factors:
 - Whilst clergy have the right to waive wedding fees in specific cases according to their judgement, they are not permitted in law to make a general waiver of such fees. This precludes simply designating certain parishes or areas as part of an experiment in making a general waiver.
 - A possible way around this would be for clergy to offer couples the option of the usual fee or making a donation instead.
 - However, there remain several major challenges, outlined below, in designing an experiment that would deliver the data requested by the motion and offer substantive evidence for or against a national waiver of fees.
 - The complications and cost of setting up such an experiment, and the demands on participating clergy, are hard to justify given the serious limitations in reliable data that could be extracted.
 - Staff also explored the possibility of gathering data through questions in a YouGov or ComRes opinion poll. However, after consulting an experienced researcher, we were advised that there was no viable way to design questions that would elicit the desired data.
 - In the end, the likely impact on the number of church weddings etc. is impossible to predict with accuracy, but if there is indeed a strong moral case for not charging fees, it stands or falls regardless of the impact in numerical terms.
6. In the light of the difficulty in enacting the terms of the motion as passed by Synod, and bearing in mind that, for many, this was essentially a moral rather than an empirical argument, it is proposed that a review of the parochial fee structure be undertaken as part of the current review of LInC Funding and Diocesan Apportionment currently being undertaken by the Finance Committee in the context of the Diocesan Finance Review, explicitly considering all fees for occasional offices and evaluating the financial impact of changing the system.

Legal issues

6. An incumbent or priest in charge has a statutory power to waive wedding fees but only “in a particular case”. That means that they must consider waivers on a case by case basis according to their judgement. They do not have a power of general waiver. This situation – which was intentionally brought about by the General Synod only 12 years ago when it approved the Ecclesiastical Fees (Amendment) Measure 2011 – precludes the simple step of designating certain parishes or areas as part of an experiment and declaring a general waiver in those places.
7. It would however be legal for clergy to offer couples the option of the usual fee or making a donation instead. The offer would be made to each couple who wished to be married in the parish. If the couple chose to make a donation, the incumbent/priest in charge would then waive the statutory fee in the case of that couple.

A regional experimental model

8. Staff considered how this could be constructed as a regional trial for a given period. We would need to identify a range of Deaneries or parishes which embodied different demographics and different patterns of weddings, with some coverage of atypical contexts such as Festival Churches – then brief them and gain their permission to join in the experiment. Over time, it would be possible to monitor changes to the pattern and number of weddings over the period of the experiment.
9. However, designing a trial that would deliver the expected data and offer evidence for or against a national waiver of fees raises serious challenges. Some of these are practical matters of implementation, but there are greater difficulties in designing a methodology that stands a chance of furnishing us with reliable data.
10. It would be relatively straightforward, although a major task, to identify a suitable cohort of areas and contexts (whether parishes or deaneries). There would follow the challenge of securing “buy-in” from the clergy who would implement the project, and gaining support from PCCs and DBFs (their permission is not required but their opposition could nullify the whole project).
11. The practical difficulties of this could be overcome. But it would need to be recognised that some factors are outside the Archbishops’ Council’s control – such as clergy and DBFs being willing to participate. In addition, setting up and running a trial would require significant time and energy, especially from local clergy and NCI staff, where resources are already stretched.
12. More fundamentally, there remain serious concerns that a regional trial project capable of implementation is unlikely to give us the data to make an informed decision about the viability of a national fee waiver. We noted that:
 - Data could only be captured from couples already seeking a church wedding, not from those deterred by the fee before consulting the clergy. This would give a strong bias toward those for whom the fee was not, in itself, a deterrent.
 - The choice between the fee or a donation would inevitably indicate the “going rate” (i.e. the level of the fee) and would therefore not give reliable indicators of the likely donation if the fee was not mentioned at all.
 - The experiment would need to run for a number of years before any consequent changes to patterns of weddings was apparent. Participation rates by clergy and parishes could easily drop off over time (“initiative fatigue”). Replacing those who dropped out with other parishes would damage the integrity of the data.
 - The experiment could not predict whether the projected donation income would be sustained once a general fee waiver had been in place for some time, or whether the waiver would generate resistance to other fees, such as for funerals.
13. It was concluded that the complexity of setting up an experiment on the lines of the Synod motion, and the demands on participating clergy, could not be justified if it could not provide reliable data as intended.

A Polling Option

14. As an alternative, the staff team considered approaching a polling company such as You Gov or ComRes to run a question or questions to a selected group of people asking whether the wedding fee is (either in reality or hypothetically) a deterrent to

getting married in church and whether, in the absence of a fee, they would be likely to make a donation. However, having consulted Prof Linda Woodhead who has wide experience of gathering data in this way, her advice was that targeting an appropriate demographic and designing a suitable question would be virtually impossible.

15. Polling companies would have no way to identify the target audience of those contemplating marriage. Their methodology is to assemble a cohort of people who, together, represent a cross-section of the wider community and then put a series of straightforward questions to them. The chances of such a cohort containing any people who were currently contemplating a church wedding would be vanishingly small and the question would be completely irrelevant to the great majority of respondents. If they bothered to answer at all, their answers would be worthless for our purposes.
16. Moreover, questions about church wedding fees would need to be carefully contextualised and this would be more involved than posing the question itself. Polling companies regard questions that require complex explanations as bad questions from the point of view of eliciting worthwhile data.

An impressionistic survey

17. Our final suggestion was to run our own survey of clergy to gather their insights on whether the fee is a deterrent and how couples, in their estimation, would respond to the invitation to make a donation instead. This could not deliver reliable or unequivocal data, but would give an impression of how clergy perceive the likely outcome of a fee waiver. It would depend entirely on how well the clergy understood the attitudes of people in their communities and would be, at best, anecdotal. This approach would be more proportionate, in terms of useable data against cost and time, than the regional trial called for by Synod, but its findings would lack authority as a basis upon which to make a decision about the future of wedding fees. Overall, our considered view is that such an exercise would not meet the objectives of the Synod motion and would not provide alternative forms of useful data.

Costs

18. The costs of running our own survey among clergy would depend on how comprehensive we tried to make it. It would require initial input from qualified staff in the Data Services team, then at least a part-time administration role at a lower grade plus the costs of analysing and presenting the data. A rough estimate of the cost would be in the region of £40,000 over a single calendar year. But we nonetheless, as above, question the value and usefulness of the data which the survey might elicit.
19. Pursuing the plan for a time-limited experiment as requested in the motion would involve a lot more staff time, both initially and over a longer period, especially in analysing outcomes at the end of the experimental period – which would have to be some years in the future if the data were to be reliable. The cost level would depend on how enthusiastically the Deaneries and parishes responded – and additional costs (including opportunity cost) incurred at parish level would also have to be taken into account. It could also depend on whether the Archbishops' Council was prepared to underwrite the trial to ensure PCCs and DBFs did not lose out financially. This approach would involve a financial cost in top-up payments as well as staff and volunteer resources to administer. The question of underwriting potential losses was raised in the Synod debate but was not specifically embodied in the motion as passed and no decision on the matter has been made.

Is This Project Achievable?

20. After considerable thought, consultation and planning, we concluded that the motion as passed by Synod is not capable of being implemented in a way which would deliver the outcomes intended. Discussion with the mover of the original motion and some of the members who supported it indicated a strong desire to fulfil the terms of the motion as passed but a regretful willingness to consider alternatives if the proposed experiment could not be made to deliver worthwhile outcomes. However, all our attempts to design alternative approaches to gathering the data have been shown to be impossible to implement and/or excessively costly (in financial and human terms, at both local parish level and the NCIs) in relation to the quality of data that could be expected.
21. As many speakers in the debate argued for or against abolishing wedding fees on moral, rather than practical, grounds, it is arguable that no data, however gathered, will generate a consensus one way or the other.
22. Given that the motion refers only to wedding fees, and wider questions about fees for occasional offices etc. are being raised elsewhere there may be advantages in considering all questions about fees together in a broader review. A Diocesan Synod Motion for the Diocese of London is currently tabled, calling for an element of funeral fees to be allocated to the PCC, and a PMM from the mover of the original motion on wedding fees, calling for the fee for a funeral to be set at zero, is gathering signatures. These, and related questions, would best be tackled a part of one policy issue.

Conclusion

24. The Synod debate has shown that there is an appetite to reconsider the practice of charging fees for church weddings. This appetite may extend to other fees for occasional offices. In the light of the above, we suggest that the terms of the amended Synod motion will not provide data or other material that will materially inform a decision on the future of wedding fees and that the questions should be approached by other routes.

25. We propose, therefore, that:

- a review of the parochial fee structure be undertaken as part of the current review of LInC Funding and Diocesan Apportionment currently being undertaken by the Finance Committee in the context of the Diocesan Finance Review, explicitly considering all fees for occasional offices and evaluating the financial impact of changing the system; and
- the Archbishops' Council give further consideration to the moral and practical questions around parochial fees in the round, not just fees for weddings, with a view to bringing proposals relating to future parochial fee arrangements to Synod within the next 12 months.

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