


EDITORIAL

Afterword: Safeguarding – The Future of Risk and Responsibility

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(Received 1 August 2024; revised 15 September 2024; accepted 16 September 2024)

Calibrating Risk and Reward

If one were to ask the average member of a Church of England congregation what the biggest threats or risks they currently faced were, I think that many would respond with a cluster of concerns – lack of youth, numerical decline, soaring costs for maintaining buildings, fewer clergy (and those who are available are spread evermore thinly), demands for more money from their Diocese and the rapid ageing profile of the membership.¹ If it featured at all in the list, safeguarding would be cited as another burdensome bureaucratic irritant – a necessary ‘tick-the-box’ exercise. As we have seen in this edition of the Journal, the fact that the Church of England spends around £50 million a year on safeguarding hardly represents value for money.

The measurement of risk is a controversial field, and as Laurence Tribe observes, it can have a tendency to ‘anaesthetise moral feeling’.² Defining risks clearly enough to measure them will inevitably bring value-related fundamentals into focus. Risk necessarily entails losing something of value, and this, of course, means that if individuals, families, communities or societies value different outcomes, they will define their risks quite differently. What we presume the risk to be reflects our core values. Mary Douglas’ classic anthropological study *Purity and Danger*³ argued societies define themselves by how they manage the perceived dangers they face. Douglas followed her mentor, Edward Evans-Pritchard, and his study of the

¹Three recent books present interesting discussions of risk and responsibility in ecclesial polity. See Thomas Halik, *The Afternoon of Christianity*, (Notre Dame IN: Univ. Notre Dame Press, 2024); Sarah McCammon, *The Exvangelicals*, (New York: St. Martin’s Press, 2024); and Penelope Doe, *Queering the Church, The Theology and Ecclesial Potential of Failure*, (London: SCM Press, 2023). The criticism of the missional initiatives being funded by the Archbishops’ Council and Church Commissioners is that a pervasive culture of patronage rewards certain types of projects, whilst not recognising ordinary ministry (narrated as a cost rather than as a net contributor). The bidding processes and outcomes have become highly divisive, somewhat politicised, and are reportedly causing significant issues for clergy and congregational morale.

²C.f., Laurence Tribe, *Uncertain Justice*, (New York: Henry Holt & Co., 2014).

³Mary Douglas, *Purity and Danger: An Analysis of Concepts of Pollution and Taboo* (London: Routledge & Kegan Paul, 1966).

Azande's views on witchcraft.⁴ Evans-Pritchard noted that the Azande invoked witchcraft for a range of risks, including adultery, fidelity, progeny, theft, crop failures, illness and even buildings (i.e., their sturdiness or collapse, etc).

Strange as Azande beliefs might seem to the developed world, Evans-Pritchard's ground-breaking study refused to treat such beliefs as primitive. He pointed out that all individuals and communities invest in managing perceived threats and warding off dangers. As sociologist Ulrich Beck noted, 'risk society' is a human norm organised around the management and minimisation of danger.⁵ Mary Douglas further noted that societies tend to fragment when their constituent groups (i.e., voters, business, government, churches, faith communities, ethnic groups, etc) cannot agree on the common dangers they face. Or, worse, they will perceive the dangers and risks others might flag as erroneous, distractions or possibly even addressing them only adding to the actual risks being faced. Definitions of risk reflect the norms adopted by a society, and point to their perception of how the world is or should be.

The course of church history is indivisible from the history of society. Harvey Whitehouse⁶ noted that there are three natural biases in humanity. Conformism (i.e., emulation and loyalty to the example of peers); tribalism (e.g., agreeing on who the tribal elders are and their powers, etc) and religiosity (i.e., developing views on the way the world could or should be). When these are aligned, the social cooperative endeavours can be substantial. But in the Church of England at present, they are malformed and unaligned. Values and risks are serious bones of contention, sources of deep conflict and increasing schism. In such contexts, safeguarding becomes weaponised; a battlefield over which other issues are fought out. Money, sex and power invariably provide fertile terrain for faith communities already fragmenting.

Current inconsistencies in clergy discipline confirm this. It is estimated that 40% of Church of England Bishops have complaints or Clergy Discipline Measure against them. None of the Bishops are required to disclose this, and none step back from ministry. Ordinary clergy, in contrast, are usually made to step back from ministry until the disciplinary proceedings are resolved. The Lead Bishop for Safeguarding, in an interview on BBC Radio 4 (14 July 2024), said she 'shared the frustration of victims' seeking truth and justice but reassured listeners that the new codes and measures were being redrafted by the same officers whose role it was to defend the institution and the episcopacy.

Furthermore, the legal disadvantage that clergy are being put at by their bishops is disturbing. There are multiple well-documented cases of clergy being called to meetings by their bishop, in which the clergyperson will be faced with allegations and accusations and, still in shock, told they must 'step back' immediately. They may be told this might only be for a few months, but it may last for years. There are multiple instances of the clergy being told that an allegation has been made but then will not be told what the allegation is or who has made it – ostensibly to protect the

⁴Edward Evans-Pritchard, *Witchcraft, Oracles and Magic Among the Azande* (Oxford: Oxford University Press, 1937).

⁵Ulrich Beck, *Risk Society: Towards a New Modernity*. Translated by Mark Ritter. (London: Sage Publications, 1992).

⁶Harvey Whitehouse, *Inheritance: The Evolutionary Origins of the Modern World*, (London: Hutchinson Heinemann, 2024).

complainant. The Church of England does not employ trained investigators, so almost any accusation can result in the suspension or termination of ministry.⁷

Invariably, bishops will insist in these encounters that their clergy are not allowed to bring a legal or union representative to the meeting, where they will be confronted by a quasi-legal process. The bishop will have legal representation but the clergy will be denied it. Here, clergy quickly discover that they have no legal rights, and they will be suspended if they don't voluntarily step back. Such practices breach Article 6 of the European Convention on Human Rights. Not even the police summon a suspect for a voluntary interview without outlining the allegation in advance, in order to allow the accused to prepare. Bishops prefer to ignore the law and effectively ambush their clergy using quasi-regal authority. The power differentials at work here amount to serious abuse – certainly financially perilous – and perhaps even a 'safeguarding matter'.⁸

It is not hard to see how the issues of risk, danger, purity and values matter to faith communities. In the Church of England, the failure to define safeguarding concerns and issues stems from the inability to agree on common risks and values. For some groups in the church, any expression of sexual behaviour outside the boundaries of marital fidelity will raise concerns on the purity-danger axis. For other groups, power differentials in gender relations pose potential threats, whilst other groups may presume such differentials to be inherently normal, and even sacrosanct as part of the ordering of creation (e.g., feminine = passive, receptive; male = proactive and invasive).

The current consultants used by the Church of England to evaluate its safeguarding effectiveness are based in Northern Ireland and have opined that any sexual activity involving under-18-year-olds could constitute a potential safeguarding issue. One wonders if the consultants have ever attended an end-of-term school party or youth club disco packed full of teenagers, the evening air reeking of hormones, and despite a ban on alcohol, finding that most attendees have somehow managed to 'pre-load' on vodka and other intoxicating spirits.

Does a party involving dozens of adolescents seriously constitute a potential safeguarding issue? In the UK, one can enlist in the armed services at the age of 16. Is that a safeguarding concern? The age of consent in the UK is 16, not 18. In Europe, only Turkey, Cyprus, the Republic of Ireland and the Vatican set the age of consent above 16. In Scotland and Northern Ireland, the legal age for marriage is 16, as it was in England and Wales until quite recently (2022). The same consultants currently advising the Church of England on best practices in safeguarding have declined to follow the UK law on data compliance.

Yet the Church of England, being a law unto itself, and mainly deploying safeguarding consultancies that empathise with its awkward ambivalence on sexuality, ensures that confusion continues to reign. Indeed, and recently over debates on same-sex marriage, the House of Bishops have declined to define what sexual conduct or actions actually consisted of. So the blanket ban remains, yet

⁷However, this is rarely the case for bishops in the Church of England, with an estimated 40% subject to complaints about safeguarding handling or bullying, yet no suspensions.

⁸Clergy may find that they lose their stipend, housing and pension entitlement at this point. In European law, the deprivation of employment without a proper legal, personnel or disciplinary process has yet to be tested in the courts.

nobody is prepared to discuss what might be happening under the blankets. The Church of England wants to police and proscribe actions that it does not wish to discuss (in any meaningful detail).

In short, safeguarding in the Church of England will continue to be conceptually ill-defined, vague and dangerous until the church is able to agree on the core values it cherishes and the primary risks and dangers it thinks it is addressing. As it cannot agree on the fundamentals of sex and power and refuses to have this externally audited, Church of England safeguarding remains mired in a hopeless gloop of unresolved claims and contradictions.

The Future of Risk and Responsibility in Safeguarding

One could express a risk as follows: ‘There is a risk that “Event X” will occur with the following consequence(s), and it is the consequences we are trying to avoid or reduce’. How any organisation regards those consequences will reveal a lot about it. One of the most interesting aspects of this is that many organisations are totally unaware of the reputational damage that something can do and what the knock-on consequences of reputational damage can be. At the same time, few organisations appreciate that simply trying to protect the organisation’s reputation can be more harmful than simply addressing ‘Event X’ directly.

We might express this as a correlative relationship between symptoms, causes, appearance and reality. For example, if a person wishes to avoid blemishes on their skin – rashes, spots, lumps and the like – then a cosmetic approach will avoid the primary risk, namely appearing to look less attractive. However, masking appearances does not deal with reality. Nor does it address the causes of the malaise (which could be a very serious, even fatal disease). By focusing on appearances and symptoms, immediate risks may be temporarily averted, but they cannot be avoided. The condition’s causes, consequences and reality cannot be covered up indefinitely.

The primary risk that the Church of England appears to be chiefly concerned with in safeguarding is the avoidance of looking unprofessional and incompetent and mitigating anxieties that it may, in fact, lack the capacity and will to deliver a safe, reliable, robust process. All the indications are that it cannot deliver this, nor anything like it. But that is not the risk the leadership of the Church of England is addressing here. It is primarily concerned with *appearances*. This accounts for its heavy investment in vacuous or disingenuous rhetoric and terminology, including Lead Bishops for Safeguarding, Core Groups, Independent Boards, Lessons Learned Review, Consultative and Listening Exercises, Panels, Assessments – and even the word ‘risk’ itself.⁹

⁹The IICSA Report covering sexual abuse in the Church of England specifically identifies the problem of the church prioritising its reputation and appearance over and above the needs of victims and the requirements for proper processes that deliver truth, justice and reparation. Despite this criticism, the culture of the Church of England’s senior leadership has not changed, and if anything post-IICSA, the situation has deteriorated further, to the point where the Archbishops’ Council no longer enjoys any degree of trust and confidence that would normally be required of a large charitable body. All attempts to change the culture from the floor of General Synod result in further internal investigations, with terms of reference set by the subjects for investigation, and the relevant committees and individuals staffing these the recipients of ongoing favouritism and patronage.

The leadership is not concerned with the underlying reality of these terms, but rather with their appearance. If they land well, they will be repeatedly deployed, until their currency is exhausted. Thus, when concern was expressed over what was implied by the title Diocesan Safeguarding Advisor when questions of competence, training, regulation, remit and accountability were raised, the Church of England dropped the word 'Advisor' and substituted it with 'Officer'. This presumably connoted their lack of independence and a weakening of their authority. Apart from that, nothing else was changed. The same people do the same job but under a new gloss.¹⁰

It is therefore hardly surprising that the Church of England cannot manage an open approach to risk registers, auditing and risk management. It suffers from a kind of corporate vanity bordering on institutional narcissism, which means it is only able to consider how it *looks* to others, not what it is actually like inside. To do so would require conflicts of interest to be named and addressed. It cannot do that either, as that very act would surface unresolved claims and counter-claims on dangers faced, and the values that matter.¹¹

Thus, some evangelical churches will be against intimate same-sex relations, and will prescribe strict boundaries for the conduct of all other intimate relationships. For other churches, teaching and enforcing such codes of conduct will be tantamount to a form of spiritual abuse. Meanwhile, the Church of England leaders won't be able to work out whether they are for or against a government ban on conversion therapy, as the church can't quite decide if homosexuality is sinful or just sadly defective and disordered, or normal.

But the Church of England will continue to try and manage its risks – or at least the leaders and the ecclesiocracy will attempt such, in regard to the reputation of the leadership and its governance. Andrew Selous, a former Member of Parliament and a Church Estates Commissioner responsible for answering other parliamentary questions about the Church of England, faced some testing questions on safeguarding matters in mid-December 2023. In response to questions raised by Sir Ben Bradshaw in the House of Commons over serious concerns relating to the conduct of the Archbishops' Council (AC) in safeguarding and treatment of victims of abuse, the Secretary General of the AC and General Synod responded as follows¹²:

¹⁰See, for example <https://www.safeguardingpanel.org/> Whilst the NSP aspires to strike the right sentiments and notes on independence, it is an internal panel sponsored and run by the very organisation it is meant to be policing.

¹¹Recent examples include appointing insiders to run (so-called) independent committees, processes or investigations. One retired Judge was appointed to chair a review panel, but failed to offer assurances on conflicts of interest and impartiality. Likewise, the former retired head of the NST, and a Cathedral Dean from the NSP – both with potentially significant conflicts of interest. Members of the Archbishops' Council who will frequently be invited to join be frequently proposed for membership of various panels investigating their own competence and conduct.

¹²Email dated 18 December 2023, 12:18 pm. The source is a victim of abuse at the hands of the Church of England, and continually denied redress by the Archbishops' Council and those bodies and processes overseen by its trustees.

You passed on some further questions received from Sir Ben Bradshaw about the AC's interim support scheme for victims and survivors of Church-related abuse.

The Scheme was developed to assist victims and survivors in urgent need and at point of crisis. It is operated by the AC, and responds to urgent requests from victims and survivors of Church-related abuse. Neither the AC nor the Church of England more widely can support victims and survivors indefinitely; and it would be unhelpful if victims and survivors become dependent on financial assistance for the Church of England in the long term... the AC nor other Church of England bodies can take the place of the statutory benefits system. However, each application is reviewed by the Scheme panel... assessed, and awards made on an individual's needs and circumstances on a case-by-case basis applying the terms of reference.¹³

The risk and the responsibility in safeguarding, as described, is therefore to be passed on to the taxpayer and government, and back to the victims. The Secretary General confirms that Church of England *policy* is to ultimately pass on the costs, risks and responsibility for victims of sexual abuse and harmed by its actions and processes to HM Treasury and the taxpayers.¹⁴

The Ecclesiastical Insurance Group withdrew from taking responsibility for the abuses perpetrated by the Church of England in 2023. At the same time, there are no mechanisms for independent, accountable, transparent or systematic monitoring of the performance of its processes regarding victims of abuse, appeal procedures, the operation of the AC and NST, and their overall conduct in public life. The individual who is charged with reviewing appeals to the Independent Support Scheme to compensate victims of abuse is also the Chair of the Audit Committee of the AC and a trustee-member of that same body. For most observers, this could constitute a catastrophic conflict of interest.

The Church of England has a National Safeguarding Team (NST) in London. The NST replaced a previous part-time national safeguarding adviser. The team is responsible for policy development, training, investigation of casework and engagement with survivors. In recent years, the team has grown in budget and staff to meet increasing demand. However, it struggles to recruit and retain staff due to self-inflicted reputational damage.

The NST is led by a national director of safeguarding. Since the role was created in 2019, no one has (so far) lasted more than two years in the post. Like most of the Church of England's safeguarding, it is subject to multiple complaints in relation to

¹³The letter continues at some length and confirms that complaints about or against the Church of England's safeguarding are 'logged' but goes on to say that the Archbishops' Council has no plans to assess its safeguarding work, undergo a review of its performance, or otherwise be answerable, liable or culpable to any external independent oversight.

¹⁴The context for this note might be treated as an unfortunate one-off lapse, were it not for a number of Diocesan Directors of Finance in the Church of England reportedly briefed by the Secretary-General that they did not need to be setting aside contingency funds in their diocesan budgets and forward planning for legal claims made by victims of abuse, as such accountability for any likely financial compensation will never happen.

the performance of its duties. However, all complaints procedures are managed by the AC and the Secretary-General. Complaints against national church officers are handled internally, without agreed terms of reference, process around evidence or even information on who can complain.

If there are too many complaints, these are classed as harassment, and the complainants are sent legal letters ('cease and desist') instructing them that they will be taken to court if they continue to protest. Other victims of abuse testify that dioceses threaten them with police action and block their emails so they can no longer communicate to complain. This tactic is widespread in safeguarding across the Church of England and is another example of shutting down victims. General Synod will then be informed that there are not, in fact, many unhappy victims complaining (as they have all been silenced by legal threats).¹⁵

The number of victims and complainants who have been sent 'cease and desist' letters is currently unknown. Attempts at General Synod (July 2024) to establish that number and the cost of the legal action were set aside by the AC, who stated that such information was confidential and that they were entitled to take whatever measures were necessary to protect their staff from such complaints (narrated as harassment). Other victims in receipt of interim support have found that their monthly allowances have been substantially reduced, following a process of covert means-testing.¹⁶

The National Safeguarding Steering Group (NSSG) oversees and issues guidance and policy on safeguarding on behalf of the House of Bishops. This group includes bishops, senior clergy and lay officers from the upper levels of the church hierarchy. The current safeguarding policy in force is called 'Promoting a Safer Church', which has been effective since 2017 and is periodically revised. This is also stacked with individuals approved by the AC and its Secretary General. There is no independent regulation, oversight or complaints procedure available for aggrieved parties. The NSSG has no powers that it can exercise and pass any complaint about safeguarding practices back to the body or individual who is the alleged perpetrator.

The NSSG is led by a Lead Bishop for Safeguarding. The current Lead is supported by two assistant bishops for safeguarding. None of these bishops have ever possessed any externally validated or professionally recognised qualifications in safeguarding. Nor are they subject to any external independent regulatory oversight that would provide reassurances for any claims to certified expertise. But were someone to be designated as 'Lead Bishop for the aviation industry', it would not follow that the bishop in question would be qualified to fly passengers, specify aircraft design, instruct flight crews on safety procedures, determine responsibility and fault in overseeing inquiries into fatal air accidents on behalf of victims or airlines she might be representing, or speak on behalf of passenger concerns.

¹⁵Confirmation from victims in correspondence with the author from multiple sources. See: ISB-11: <https://independentsafeguarding.org/reports>.

¹⁶Examples include the separated partners of victims unknowingly disclosing their income and then finding that the Church of England reduced its support to the victim concerned. Or, victims complaining about the low level of income support from the church, who respond with further delays in payment and reductions. Private correspondence with the author, December 2023, and April to September 2024.

Bishops operating in safeguarding have no legitimate external expertise that the general public could rely upon. Given that, nobody could teach in a school, practise medically or in law, the phrase ‘Lead Bishop . . .’ (of anything) is something of a confection, especially in safeguarding. The role exists to offer comfort to General Synod. This is done through the administration of soothing anaesthetic promises and vague processes. The primary function of the role is to safeguard the reputation of the church and convey the *appearance* of care and professionalism in the face of all evidence to the contrary.

Established in 2014, the National Safeguarding Panel (NSP) theoretically provides guidance on safeguarding policy and ensures that the Church of England follows best practices. It oversees how the church promotes safeguarding, responds to disclosures and supports survivors. Its members include clergy, abuse survivors and safeguarding experts. However, the NSP has no independence from the Church of England and lacks any powers to investigate or censure the NST for poor or malicious practices. It is an intentionally toothless body.

The Independent Safeguarding Board (ISB), established in 2021, was intended to provide external scrutiny and challenge to the internal safeguarding authorities in the church. It consisted of three members outside of the church who had the authority to issue reports, review the handling of specific cases and offer advice. However, it was disbanded in June 2023 after its first chair resigned due to data breaches. The interim replacement of the chair imposed by the Archbishops was quite rightly rejected by the other board members. As a result, the AC, which funded and employed the ISB, decided to dismiss the remaining members and start afresh after concluding that relationships had irretrievably broken down and that the ISB was ‘*too independent and survivor-focussed*’.

The Cult(ure) of Leadership

At the time of writing, questions have been raised about the discernment processes concerning prominent Anglican evangelical leaders. The concerns raised hover over the lionising of leaders such as the late John Smyth QC, the Revd. Jonathan Fletcher and the Revd. Mike Pilavachi, all of whom were subsequently discredited following serious investigations over alleged behaviour in relation to grooming and safeguarding breaches.¹⁷ At the same time, the defenestration of the late Bishop George Bell (1883–1958) was based on deeply flawed processes and premature judgement, which was subsequently retracted following an independent inquiry led by Lord Alex Carlile.

The serving of a Notice of a Prevention of Death on the Archbishop by the Coroner, Mary Hassall, at Marylebone Court, in relation to the suicide of Fr. Alan Griffin, falsely accused by the Church of England of safeguarding breaches, resulted in no changes to Church of England processes in safeguarding processes, and no

¹⁷Pilavachi was fast-tracked to ordination, quickly became a canon of St. Albans, and also received an honour (i.e., medal) for service to the church. There are some echoes of the lapses in scrutiny and oversight that became apparent in the case of Revd. Chris Brain, founder of the Sheffield Nine-o-Clock Service.

person working for the church was held to account for preventable death, despite the Coroner issuing the Notice – an act entirely without precedent in the Church of England's history.¹⁸ The clergy and church officers held to be responsible for the death all sought to have their names redacted from the published report.

Victims of abuse have openly stated in writing that the only concern that the Church of England hierarchy has regarding their potential or actual suicide is one of reputational damage to the institution. Ironically, at the point where the victim is most vulnerable and close to ending their life, the church that has re-abused them will, at this point, offer 'help and pastoral support' on terms determined by the church, and using an agent that has no independence from the hierarchy that is perpetrating the abuse.

When this is rejected (inevitably), the usual victim-blaming will narrate the abused party as unreasonable. Nothing the Church of England says or does in safeguarding is open to scrutiny or appeal. Its work in this sphere is not intended to be truly independent and is consistently mistrusted for its self-serving aims and, of course, the incompetence and coverups it believes it is bound to conceal.

Over the past fifty years, the Church of England has set out to imitate secular organisations and corporations. It has mostly failed to replicate the models of secular organisation and leadership to any degree and ended up with extremely poor reproductions. At the same time, clinging to the privileges and powers of monarchical authority has led to a situation in which there is little public patience left with unaccountable and non-transparent corporate-episcopal leadership. The lack of liability and responsibility in elitist models of control and governance has also rendered the Church of England's hierarchy morally and reputationally bankrupt in the eyes of many.

What seems to keep things ticking over at the present time is the phenomena that sociologists refer to as 'Pournelle's Iron law of Bureaucracy' – named after an American scientist, essayist and philosopher, Jerry Pournelle (1933–2017). Pournelle theorised that organisations or institutions were comprised of two kinds of staff. First, those devoted to the organisation's goals, purpose, vision and ethos. Second, those dedicated to the organisation itself would regard the goals, purpose, vision and ethos as subordinate to the existence of the organisation. In every case, noted Pournelle, the Iron Law states that the second group gains control of the organisation or institution and will ultimately go on to determine who succeeds in power and authority.¹⁹

With all of the key roles and tasks eventually secured by the second group, the organisation becomes an ontologised executive. Churches, universities and other institutions can all bear witness to such trajectories. Pournelle's Iron Law is at home in either the old or the new world, and it can take advantage of monarchical or democratic polity. But it will be less visible and accountable in monarchical systems of governance, precisely because of the lack of transparency and the 'mystique' of those who rule.

¹⁸Coroners and Justice Act 2009, paragraph 7, Schedule 5, and The Coroners (Investigations) Regulations 2013, Regulation 28 and 29. See: <https://www.bbc.co.uk/news/uk-england-london-57780729> and <https://www.thinkinganglicans.org.uk/coroner-criticises-church-of-england-for-negligence-in-suicide-case/>.

¹⁹See Jerry Pournelle, "Current Chaos Manor Mail" in jerryournelle.com, August 31, 2017.

Thus, tokenism can reign supreme in a culture where valorised gradualism is part of the ecology of establishment and monarchical hierarchy. Even today, tweaks and reforms are still the favoured responses, just as they were in the 18th and 19th centuries. Modest gradualism and reform are the eternal friends of monarchical power, as they require micro-modest tweaks to the current arrangements. Only modest, mild adjustments to the present need to be made. The agenda is to retain the majesty and power of the Steady State and its ruling elite. And the courtiers will see to it that Pournelle's Iron Law delivers now, and in the generations to come.

As scholars of institutions and organisations know, the primary purpose of a system is what it does. One might expect Christian patterns of behaviour from the body of senior leadership within the Church of England. But as with Pournelle's Iron Law of Bureaucracy, the purpose of the system is to look and sound good, manage reputational damage, remain independent and stay in control. The bureaucracy resists external scrutiny, regulation, and even English law precisely because it disrupts corporate public relations.

This leads to investment in reality avoidance so that within the system, there is deliberate dissonance that irons out potential discrepancies between expectations and outcomes. The Church of England's hierarchy, therefore, evolves into one that mimics democratic accountability, organisational structure, professionalism and basic proficiency in fields such as safeguarding, employment law and governance. In reality, it has no investment in becoming effective in such spheres, as they would soon hold the senior leadership and their cadre of senior bureaucrats accountable to assessment and standards.

According to Pournelle, the purpose of the system is ultimately to remain aloof, as monarchs might, and avoid being subject to external scrutiny. Yet this quasi-regal executive leadership no longer works. Social deference can no longer be assumed, and few amongst the elite-born class of yesteryear are cut out to face the challenges of contemporary culture and accompanying global crises. Confidence, trust and even belief in the probity and integrity of the institutions under their tenure effectively collapsed.²⁰

Conclusion – Ending the Leviathan:

In terms of safeguarding, there are now three strategic risks that the Church of England is trying to manage.

1. Legacy and Reputational Risk – Corporate and Individual.
2. Resource Risks – Time, Labour and Cash.
3. Annihilation – The earthquake of external-regulatory intervention.

These risks will all increase the longer the Church of England continues to kick the proverbial can down the road, and every action in trying to control, mitigate or manage the risk only increases it, since the leadership won't address the root problem. Namely, the lack of trust and confidence in the integrity, probity and

²⁰See the discussion of integrity frameworks in Martyn Percy, *The Crisis of Colonial Anglicanism: Slavery, Empire and Revolt in the Church of England* (London: Hurst Publications, 2025).

competence of the leadership. It is no longer there. The essential problem for the Church of England – existential, actually – is that the leadership assumes the regulatory risks faced by other voluntary bodies do not apply to them.

The other issue was developed by Douglas with her colleague Aaron Widavsky²¹ (a political scientist) is that communities, tribes, groups, societies and faiths fall apart and fragment when they cannot see the same dangers and risks as their kith, kin and colleagues. This stems from the lack of shared values, or having values that are inherently at odds with others in the same group or society. So for the Church of England at present, its binaries on sexuality, gender, power, money, resources, mission, ministry and the like all stem from there being no consensus within the values-threats-risk-reward-mitigation-accommodation paradigm. We see this very clearly in the Global South versus Developed World debates on sexuality, where values and risks are simply not agreed upon or shared. Here, the writing is on the wall for the wider Anglican Communion. The Provinces perceive different risks since they hold different values.²²

The Church of England simply cannot manage rational safeguarding conversations at home, never mind across the wider Communion, since it would require too much social awareness, moral reasoning, honesty and self-examination of its power, authority, accountability, responsibility and liability. So, the leadership continually suppresses, avoids or fudges such conversations – which, of course, only leads to further risks and greater dangers. And steeper declines in trust, respect and confidence, to its current point of negative equity.

Meanwhile, and across the world, most Anglicans have moved on from being mere subjects of a colonial church to becoming global citizens with opinions, rights, powers and leverage. And yet the Communion, like its parent church, is quickly coming apart at the seam that stitched together two organic skins of ecclesial polity that were ultimately bound to reject each other. The tension that Elizabeth I and her *Via Media* project once appeared to have pulled off does not look like it can endure for an eternity.²³ The tension rests between a model of authority in the church that sees prelates ruling over plebians on the one hand. And on the other hand, the devolved power of Presbyterianism, where authority primarily rests with the local congregation.

The bishops and their burgeoning legions of ecclesiocracies sit in the middle of this, hoping to maintain control over two models of the church that are rapidly bifurcating. The quasi-monarchical episcopal model that conflates deity with domination is now exposed as an unaccountable, elite, entitled and aloof brand of Laudian ecclesial governance. Much like an early Stuart monarch might have assumed a divine right to rule over Parliament and all subjects, and promoted its divine right and absolutism in decision-making. Rather like James II and Charles I with Parliament, the Archbishops and Bishops consider that the proroguing of

²¹Aaron Widavsky & Mary Douglas, *Risk and Culture: An Essay on the Selection of Technical and Environmental Dangers* (Berkeley, CA: University of California Press, 1982).

²²See Theo Honson, <https://www.spectator.co.uk/article/the-c-of-e-needs-to-talk-about-sex/> July 13 2024, for an excellent discussion of the inherent Anglican fudginess on sexuality.

²³See Martyn Percy, *The Crisis of Colonial Anglicanism: Empire, Slavery and Revolt in the Church of England* (London: Hurst Publishing, 2025).

Diocesan Synod or even General Synod is in their gift. Thus, the Presbyterian-Republican model of polity, with its inherent democratic accountability, is resisted at all costs since it has little need for bishops (save for representative or ritual purposes) or much time for centralised infrastructure.

At the same time, some bishops know, deep down, that the Christian faith is a risk-embracing enterprise and not one that is risk-averse. The life and ministry of Jesus, the first apostles and that of the early church all exemplify this. The incarnation is an inherently risk-related doctrine. Bishops also know that the only way to recover a more risk-related ecclesial polity is to actively embrace less power and authority. But as they will not disinvest in their power and authority, risk management is all they can practice. Worse, risk management is only focused on reducing responsibility to maintain the mystique of quasi-monarchical authority.

In the 21st century, this model of ecclesial polity simply cannot govern ethically or effectively.²⁴ Its quasi-monarchical pretensions ensure that it will not get drawn into the details of human sexuality. Nor can the bishops bear to countenance some regulatory or legal framework that could place the Church of England at any disadvantage or to be measured against independent external criteria that it cannot control or pre-determine the outcome. The Church of England exempted itself in law from aspects of the Data Protection Act 1998/2018 and Freedom of Information Act 2000, so is non-routinely compliant with requests for personal data and other information. These Acts of Parliament created a public 'right of access' to information held by public authorities. However, the church employs dozens of data protection officers, part of whose role is to be non-compliant with the law, and only release information that cannot cause significant harm to its reputation. *Appearances* are what matter to the Church of England's hierarchy. As such, the Church of England is simply unable to manage serious risks and responsibilities properly, because it usually cannot bear to face them.

The Anglican Communion and the Polity of Oversight

Globally, it would seem that democracy is under threat as never before. Autocracy can reign in democratic states, as several modern states can bear witness. The potential for tyranny never entirely vanishes, and when democracy finds itself under the heel of autocracy, the only defence of freedom that is left lies with the law. Autocrats know that too, and will turn on the judiciary, prorogue parliament, change the laws, suspend the constitution and seize hold of 'emergency powers'. Crises of any kind can be the occasion for mounting a coup against the citizenry.

In the present age, the Anglican Communion is caught between models of governance and oversight that blend plutocracy, autocracy and despotism with monarchical and democratic ideals. It has ontologised quasi-managerialism into a new ecclesiocracy, and the christened it as leadership. In many parts of the Anglican Communion, the result has left the episcopacy stranded as resented rulers who no longer represent the will of the people in pews. Furthermore, the continued extension of democratisation through the information revolution means that the

²⁴See Dan Davies, *The Unaccountability Machine*, Profile, 2024; and see also Stafford Beer, *Brain of the Firm* (London: John Wiley & Sons, 1972).

clergy, laity, people and nation are no longer required to take the word of their respective religious leaders as gospel.

The Jesuit scholar Walter Ong might have identified the underlying problem here, and in relation to information, knowledge and power.²⁵ The first information revolution was writing, namely the Axial Age 8th–3rd BCE, referring to the transition from oral cultures and languages to written, and thereby creating an independent bank of social and communal memory. The second aged is mass-printing, which in the 16th century enabled the Reformation. Religion thrived, diversified and expanded across these two eras. The third age is the present. Namely, one of instant, ubiquitous, universal information overload, such that even ‘alternative facts’ can flourish in a post-truth aeon.

Faith communities, their leaders and religious identity is struggling with this third age. The constant flow and overload of information increases choice and empowers democracy, but also increases the possibilities for individualism. The third age, like the first two, questions the need for intermediaries to hold or interpret knowledge. People can decide for themselves. Anxiety and even anger tend to increase, and authority only becomes more flustered as it loses the trust and confidence of its former adherents.

Church leaders, typically, tend to double-down at this point, and seek to reassert old patterns of power and authority on a new order. Rather like trying to travel back through time, and govern the church as though there was no printing, the challenges of the third information revolution have yet to be computed by those leading (or revolting within) the Anglican Communion. This third age cannot be countered by charismatic, executive or bureaucratic expressions of quasi-regal power lodged into the episcopacy. Nor will it prevent schism. The culture of patronage is limited in what it can bestow, and as the stock value of the Archbishops and Bishops continues to decline, fewer will want to be as closely related to what the institution represents.²⁶ The signs of fragmentation are everywhere, and appear to be irreversible.²⁷

The safeguarding issues and concerns we have identified in these essays and articles point to some deeper problems that are endemic across the Anglican Communion. Its ecclesial polity, by trying to remain ‘a law unto itself’, has tended to result in individual provinces acquiring varying portfolios of roles and responsibilities that it can no longer manage adequately or credibly in relation to the wider world. The emerging ecclesial leviathan can start to resemble a kind of micro-medieval state, functioning as some monarchical enclave whilst the wider world around it develops better and broader systems of polity. Furthermore, the polity enclave starts to thinly reify some aspects of the very God it worships. Bishops and ecclesiocracies evolve into making omniscient, omnipotent and omnipresent claims that are meant to reassure the faithful, and convince the outsider. Increasingly, there are signs that the reassurances are failing, and the wider public deeply unconvinced.

²⁵See Walter Ong, *Orality and Literacy*, (London: Routledge, 1982).

²⁶<https://www.churchtimes.co.uk/articles/2024/2-august/comment/columnists/angela-tilby-schismatics-in-the-c-of-e-go-up-a-gear>

²⁷See Theo Hobson, <https://www.spectator.co.uk/article/what-the-church-of-england-should-say-to-its-conservative-rebels/>

The Anglican Communion is by no means the only denomination to suffer from a growing deficit of trust and confidence. All we can say about safeguarding is that the wider secular sphere will professionalise and regulate the field, much as was done in earlier centuries with education, healthcare, welfare and other forms of social provision. Churches will not be able to match the professional standards adopted by wider society, and that leaves denominations with some existential choices. Do churches concede that in arenas such as safeguarding, they cannot manage public and professional standards of practice, and so need to submit to a regulatory framework that can judge their performance? Or, do churches try and pass their efforts off as equal-but-different – a kind of alternative professional and regulatory reality? If it is the latter, then it is clear that the cause is already lost. A diminishing group of insiders might be persuaded that the church can indeed be, credibly, ‘a law unto itself’. But the wider public already know this to be an act of inchoate self-deception. Trust and confidence in churches running their own safeguarding regimes has all but vanished, and it will not return.

So what fate awaits the Church of England here? As the historian Mark Harrison noted of the Soviet Union, when leviathans evolve into becoming ever-more secretive, and any rules, checks and balances are removed from public scrutiny, everything that matters happens behind the scenes. Indecision becomes incentivised, and vested interests are never called out. The citizenry withdraw their trust, and a tiny elite just focus on making sure the entire system does not collapse. But collapse it will. Largely, like the bureaucratic imperialism Soviet Union, under the weight of its inefficiency, corruption and cover-ups.²⁸ This is a leviathan on its last legs.²⁹

The present situation is democratically unconscionable, where the Church of England exempts itself from laws on equality, accountability, data compliance, transparency, sexuality and gender that it doesn’t like. It cannot continue. Especially when, at the same time, the Church of England enjoys enormous privileges (including tax, finance, etc) in the country it is meant to serve and represent. One can no longer justify a church that exempts itself from the rule of law, yet presumes to be the national guardian for moral well-being. With so few of the nation offering the Church of England any mandate for its privileges, the time has come to disestablish. The Irish, Welsh and Scottish Anglicans have managed this. England can too.

I suspect that matters will be taken out of the hands of the Church of England in the near future. The consequential renouncing of Primatial power or authority over the Provinces of the Communion is more descriptive of the present than prescriptive for the future. The Church of England has tried, for centuries, to play a pivotal international role by claiming to be a *via media* between Catholic and Protestant ecclesiology. Up to a point, that constituted a worthy goal. But the goal has proved to be unattainable, and the game is plainly now over. The consequences for the Anglican Communion cannot yet be known. But a final story might help.

During President Richard Nixon’s visit to China in February 1972, he was received by the then-Chinese Premier, Zhou Enlai. At a diplomatic lunch hosted by

²⁸Mark Harrison, *Secret Leviathan: Secrecy and State Capacity Under Soviet Communism* (Stanford: Stanford University Press, 2023).

²⁹See David Runciman, *Confronting Leviathan* (London: Profile Books, 2021).

Zhou, he was asked what he thought about the French Revolution. He paused and then famously remarked, 'It is too early to tell'. The quip is striking, for we do not know what the impact of that event – more of a process – has really been. Likewise, the American Revolution. It is possible that Zhou thought the question referred to the 1968 student-led protest movements in Paris during May 1968, rather than the bloody revolution of 1789.

But to my mind, 'too early to tell' helps us see the contingencies and consequences of such events in context.³⁰ History is not in the past. It shapes the present and the future. The more we understand how our culture has been and is being shaped, the more likely it is that the beliefs, commitments and ideologies that we adhere to can be read in a way that does not pre-determine our next steps. We need to understand how this ecclesial leviathan was made if we are to save it from itself and its victims.

Ultimately, safeguarding in the Church of England is not some detached or semi-detached structural or governance problem. It is a microcosm of a systemic issue baked into the polity and hierarchy of the Church of England. The leadership lacks the professional expertise required in most of the fields in which it operates, with very few exceptions. Across education, training, financial accountability and transparency, governance, personnel management, scrutiny, human resources, employment law, equality legislation, data compliance and other legal obligations, and more besides, the Church of England's leadership and management will consistently fall well below the normative standards expected of public institutions and organisations.

Safeguarding matters simply highlight these problems. It is merely a microcosm of the ontologised managerial culture within the church that has evolved into a dystopia. Until this changes, the Church of England will continue to run a range of spurious and specious parallel universes on safeguarding, auditing, fiscal transparency and the like. The bishops and their supporting ecclesiocracies will continue to try to reserve all power, authority and resources to themselves whilst devolving more and more of the human and financial costs, responsibilities and risks of ministry onto the clergy and their congregations. This cannot end well.

³⁰Cited in Andrew Hindmoor, *Haywire: A Political History of Britain Since 2000* (London: Allen Lane, 2024), 12–13.