

<p>1 Friday, 14 August 2020</p> <p>2 (10.30 am)</p> <p>3 THE CHAIR: Good morning, everyone, and welcome to this,</p> <p>4 Day 16, the final day of this public hearing. Please go</p> <p>5 ahead, Ms Scolding.</p> <p>6 MS SCOLDING: Thank you very much, chair and panel. This</p> <p>7 morning, we will hear evidence from Mr Harvey Grenville</p> <p>8 of the Charity Commission.</p> <p>9 MR HARVEY GRENVILLE (affirmed)</p> <p>10 Examination by MS SCOLDING</p> <p>11 MS SCOLDING: Good morning, Mr Grenville. Thank you very</p> <p>12 much for coming to give evidence this morning. A few</p> <p>13 preliminary matters before I take you to your witness</p> <p>14 statement.</p> <p>15 Firstly, this is not a test of memory. You can</p> <p>16 refer to your notes, your witness statement or any</p> <p>17 exhibits at any time.</p> <p>18 Secondly, we can have a break -- we will have</p> <p>19 a break after an hour, but we can have a break sooner</p> <p>20 than that, if you need one.</p> <p>21 If there are any technical problems, please do hold</p> <p>22 fire and our technical team will try and get back to you</p> <p>23 as soon as possible. You should have a bundle in front</p> <p>24 of you, which is made up of one lever arch file, which</p> <p>25 contains both your witness statements and other relevant</p> <p style="text-align: center;">Page 1</p>	<p>1 exhibits and evidence.</p> <p>2 We will get, if and when we need to, various of</p> <p>3 those exhibits and documents up on screen via the</p> <p>4 mechanism of the document handler. But if you wish to</p> <p>5 look at them on paper, please feel free to do so.</p> <p>6 We have one witness statement from you which is</p> <p>7 54 pages in length, dated 9 January 2020, which is</p> <p>8 behind tab 1. It is A1 of your witness statement. Can</p> <p>9 I ask you to confirm that you signed this statement?</p> <p>10 A. Yes, I did.</p> <p>11 Q. Is it true, to the best of your knowledge and belief?</p> <p>12 A. Yes. There is one point to raise, which I think was on</p> <p>13 paragraph 31. There's a factual error. We reference</p> <p>14 the number of faith sector and religious organisations</p> <p>15 in that paragraph, and then there's a section there that</p> <p>16 says it excludes Roman Catholic or Anglican religious</p> <p>17 sector bodies, and that paragraph should have -- that</p> <p>18 section of that sentence should have been removed. The</p> <p>19 34,000 includes all faith-based organisations on the</p> <p>20 register.</p> <p>21 Q. Thank you. We will make that addendum. It is _007,</p> <p>22 chair and panel, but we will obviously recognise that as</p> <p>23 an amendment to your witness statement.</p> <p>24 Your current job title, as I understand it, is</p> <p>25 senior technical advisor with the Charity Commission,</p> <p style="text-align: center;">Page 2</p>
<p>1 but prior to that, you were the head of safeguarding</p> <p>2 development, and prior to that, you were the head of</p> <p>3 investigations and enforcement at the</p> <p>4 Charity Commission. Could you just tell us a little</p> <p>5 about what your current job involves?</p> <p>6 A. As part of my current role, I continue to have oversight</p> <p>7 of the development of the Commission's safeguarding</p> <p>8 capabilities. I also have oversight over some of</p> <p>9 the Commission's principal and higher-risk, more complex</p> <p>10 safeguarding enquiries, for example, recently concluding</p> <p>11 the RNIB statutory inquiry.</p> <p>12 We provide advice within the Commission on a number</p> <p>13 of technical matters, as well as capability development?</p> <p>14 Q. Thank you very much.</p> <p>15 A. Prior to that, as you said, I was the head of</p> <p>16 investigation enforcement and the senior officer</p> <p>17 responsible for the conduct and delivery of</p> <p>18 the Commission's statutory inquiries.</p> <p>19 Q. We will come on in a moment to talk about the role of</p> <p>20 the Charity Commission in respect of statutory</p> <p>21 inquiries. Perhaps just a little bit of introductory</p> <p>22 information for those who are not familiar with the work</p> <p>23 of the Charity Commission. Just to broadly indicate,</p> <p>24 what is the Charity Commission and what is its role?</p> <p>25 A. The Charity Commission is the registrar and regulator of</p> <p style="text-align: center;">Page 3</p>	<p>1 charities in England and Wales. We are an independent,</p> <p>2 non-ministerial government department with</p> <p>3 quasi-judicial powers. We are responsible for</p> <p>4 identifying if organisations are charitable and meet the</p> <p>5 requirements to be added to the Register of Charities.</p> <p>6 The objectives, functions and powers are primarily</p> <p>7 defined through the Charities Act 2011, but there are</p> <p>8 supplementary pieces of legislation which are also</p> <p>9 relevant to our role.</p> <p>10 Q. You have already identified, because we have already had</p> <p>11 a look at paragraph 31 in which you say there are around</p> <p>12 34,000 faith-based organisations which are registered</p> <p>13 with the Charity Commission; is that right?</p> <p>14 A. Yes. It's not a precise number, because it's based on</p> <p>15 charities that classify themselves as undertaking</p> <p>16 religious activities of some form, and that can be quite</p> <p>17 broad ranging in nature. But about 80 per cent of those</p> <p>18 are based on a Christian -- are supporting the Christian</p> <p>19 faith with the remainder being made up of other faiths.</p> <p>20 Q. Danny, would you mind getting up CYC000440_032,</p> <p>21 paragraph 158. This is a little table that you have</p> <p>22 helpfully produced for us which identifies the makeup by</p> <p>23 way of faith group of those charities which identify as</p> <p>24 having some form of religious focus.</p> <p>25 The majority of those, around 80 per cent, are</p> <p style="text-align: center;">Page 4</p>

<p>1 established to support the Christian faith, with the 2 remainder being made up of other faiths. 3 A. Yes, that's correct. So, as you can see from the table, 4 there are just over 3,000 registered charities connected 5 to the Islam faith; over 2,000 connected to the Jewish 6 faith; and around 1,000 connected to Hindu, Sikh and 7 Buddhist. 8 Q. Do religious organisations have to be registered as 9 charities in order to be able to operate? 10 A. No. I think that's an important point, that 11 registration with the Commission does not confer 12 charitable status on an institution, and there are many 13 institutions which are classed as charities but which 14 are not required to register with the Commission. There 15 are broadly three reasons for that: one is because they 16 are below the income threshold for registration with the 17 Commission, which -- 18 Q. What is the income threshold for registration with the 19 Commission at the moment? 20 A. Sorry, could you repeat that? 21 Q. What is the threshold? 22 A. Unless it is excepted, the annual income is £5,000 23 a year. 24 Q. Right. 25 A. There is then a second group of charities which are</p> <p style="text-align: center;">Page 5</p>	<p>1 known as excepted, ie, they are excepted from the 2 requirement to register with the Commission and to 3 submit annual returns to us. This is quite a large 4 group. Churches and other charities of certain 5 Christian denominations that are wholly or mainly for 6 public religious worship currently sit under these 7 excepted regulations if their income is £100,000 a year 8 or less. Now, our best estimate of these is that there 9 are around 30,000 to 40,000 religious charities which 10 are excepted from registration under these regulations. 11 Q. Are they largely charities to do with the 12 Church of England, because you talked about public 13 religious worship, or is that really any sort of 14 building or facility which is used for religious worship 15 could be an excepted charity if it is Christian? 16 A. Yes. There are certain Christian denominations that are 17 recognised and so it extends beyond Church of England. 18 Q. But it's only -- I'm assuming that that's a peculiarity 19 of charity law dating back from times when there were 20 fewer alternative faith groups available in England and 21 Wales; is that right? 22 A. It's an historical legacy, if you like, and there's been 23 a progressive aim, which started in the 2006 Act, 24 Charities Act, to start the harmonisation process, if 25 you like, of registration of charities.</p> <p style="text-align: center;">Page 6</p>
<p>1 Q. So, for example, I know that within the 2 Church of England, cathedrals -- all cathedrals would 3 have been excepted charities, but they are now going to 4 come, as I understand it, within the purview of 5 the Commission, or are likely to quite soon? 6 A. This is where it gets quite technical and complex. 7 Q. Okay. 8 A. Strictly speaking, cathedrals are not excepted 9 charities, and neither are they exempt. 10 Q. Right. 11 A. But the lay point is that they are not on the Register 12 of Charities and they're currently under the regulation 13 of Church of England. We are in discussion with -- and 14 there is a programme of work under way whereby 15 41 cathedrals will be registered with the Commission in 16 due course. 17 Q. That's what I thought. 18 A. That's a clear focus of work for us that's under way at 19 the moment as part of getting unregistered faith 20 organisations onto the Commission's register. 21 Q. So, at the moment, you have got thousands of Christian 22 organisations which could be considered to be excepted 23 charities, so they could run themselves as a charity, 24 operate as a charity, but you would really have no -- 25 they don't have to register with you and you have no</p> <p style="text-align: center;">Page 7</p>	<p>1 oversight of them whatsoever? 2 A. They fall under our -- so there's a distinction -- this 3 is where -- I'm trying desperately not to get too -- 4 Q. Technical is fine, as long as a layperson like myself 5 can understand it as well. 6 A. There's a distinction between excepted charities, which 7 are under the Commission's jurisdiction -- as you have 8 highlighted, the challenge for us is that they're not on 9 our register, and, therefore, in practical terms, 10 certain types of excepted charities, especially local 11 independent ones, are very difficult for us to regulate 12 in practice compared to others that maybe sit under 13 another body, for example, like the armed forces, where 14 we can supervise those excepted charities much more 15 robustly. 16 Exempt charities are subject to -- 17 Q. We are talking about excepted charities at the moment. 18 We will come on to talk about exempt charities in 19 a moment. 20 So we have got a group of charities which are 21 registered with you which you have to regulate. Then we 22 have got a group of charities that you have to regulate 23 but which don't have to register with you -- 24 A. Yes. 25 Q. -- the excepted charities, of which you are saying you</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 are gradually trying to move those charities into having</p> <p>2 to be registered with you?</p> <p>3 A. Yes.</p> <p>4 Q. How long do you think that process is going to take? Do</p> <p>5 you have an end date for that?</p> <p>6 A. I think, regardless of what happens with the ending of</p> <p>7 the excepting regulations, it's clear that the volume of</p> <p>8 excepted religious charities that we estimate to be out</p> <p>9 there, we'll require them to be registered on a phased</p> <p>10 basis. It's difficult to be prescriptive on what the</p> <p>11 timescale of that will be because there are a number of</p> <p>12 unknown variables in this at the moment.</p> <p>13 I think our best estimate is that that would be</p> <p>14 phased over three to five years. It's equivalent to</p> <p>15 five to six years of registration work for us to get all</p> <p>16 of those charities onto our register.</p> <p>17 Q. What are the advantages of having those charities on</p> <p>18 your register, as opposed to just leaving them where</p> <p>19 they are as excepted charities?</p> <p>20 A. The transparency and accountability points are the key</p> <p>21 ones here. Those charities would then be required to be</p> <p>22 on the register, submit annual returns to us, assuming</p> <p>23 they're above the income threshold, to file annual</p> <p>24 reports, and it makes the interactions with those</p> <p>25 charities, in terms of our regulation, that much easier</p> <p style="text-align: center;">Page 9</p>	<p>1 to keep track of.</p> <p>2 Q. Along with excepted charities, and obviously the</p> <p>3 peculiar status of cathedrals, and I know that there are</p> <p>4 probably, historically, another couple of sort of</p> <p>5 peculiar institutions that fall between various stools,</p> <p>6 I would imagine there are charities that don't have to</p> <p>7 register with you. There is also exempt charities. Can</p> <p>8 you tell us a little bit about what an exempt charity is</p> <p>9 and what registration or regulation powers you have over</p> <p>10 those?</p> <p>11 A. That's a further distinct class, and the principal</p> <p>12 defining feature which distinguishes those from, say,</p> <p>13 excepted charities is that we are not the principal</p> <p>14 charity regulator for those classes of charities, and</p> <p>15 there will be a principal charity regulator designated</p> <p>16 for that class or group of charities. So, by way of</p> <p>17 example, although it is not religious, if you look at</p> <p>18 Academy Trusts, they are classified as exempt charities,</p> <p>19 and their principal regulator for the Academy Trusts and</p> <p>20 proprietors is the DfE, the Department for Education.</p> <p>21 So there are certain things that we can do in</p> <p>22 respect of their regulation as secondary tier. As</p> <p>23 I said, we are not the principal charity regulator for</p> <p>24 those exempt charities.</p> <p>25 Q. Largely, are those exempt charities sort of schools and</p> <p style="text-align: center;">Page 10</p>
<p>1 hospitals?</p> <p>2 A. Functional types, yes. They're the ones that spring to</p> <p>3 mind most readily.</p> <p>4 Q. In terms of who may have a relationship with a religious</p> <p>5 organisation, because, for example, religious bodies are</p> <p>6 often the foundation body, so to speak, for many</p> <p>7 schools, and also for some hospitals?</p> <p>8 A. Mmm-hmm.</p> <p>9 Q. So they would be regulated by the Department for</p> <p>10 Education or Ofsted or the CQC, the Care Quality</p> <p>11 Commission, in the UK -- there's a separate body in</p> <p>12 Wales, the Care Inspectorate Wales.</p> <p>13 A. I can say, if it is an exempt charity, it will be</p> <p>14 subject to a different principal regulator.</p> <p>15 Q. But you can have some regulatory oversight of those</p> <p>16 organisations?</p> <p>17 A. We have some regulatory role to provide. So there are</p> <p>18 certain provisions of the Act which exclude exempt</p> <p>19 charities. But, for example, we could, upon application</p> <p>20 by the principal regulator, open a statutory enquiry if</p> <p>21 we were requested to, subject to our usual risk</p> <p>22 framework decisions.</p> <p>23 Q. Even though you are not principally in charge of them,</p> <p>24 you could, if you wanted to, take regulatory action</p> <p>25 against them?</p> <p style="text-align: center;">Page 11</p>	<p>1 A. Yes, in some circumstances.</p> <p>2 Q. Of course. But I'm thinking in principle. We can come</p> <p>3 on to some specific examples later, Mr Grenville.</p> <p>4 So what are the principal advantages of registering</p> <p>5 as a charity? Once we have gone through the almost</p> <p>6 Byzantine route of working out who is exempt, who is</p> <p>7 excepted and who has to register, are there advantages</p> <p>8 of registering as a charity for a religious</p> <p>9 organisation, and, if so, what would they be?</p> <p>10 A. I can talk in general terms --</p> <p>11 Q. Of course, in general terms, not --</p> <p>12 A. -- rather than specifically, because I think that when</p> <p>13 you get into the specifics and some subsectors, there</p> <p>14 are certain groups, for example, within the faith-based</p> <p>15 community that see limited advantages to being</p> <p>16 registered as a charity. But, in principle, the</p> <p>17 transparency and accountability that I reference is</p> <p>18 a major factor in -- or can be a major factor in</p> <p>19 encouraging public or institutional donor support for</p> <p>20 that organisation, and obviously there are tax</p> <p>21 advantages for a charity.</p> <p>22 It depends on the organisation, obviously, as to how</p> <p>23 significant those factors are --</p> <p>24 Q. Yes.</p> <p>25 A. -- in terms of the benefits, and some will therefore</p> <p style="text-align: center;">Page 12</p>

<p>1 view those benefits as being marginal, whereas others 2 will view them as being highly attractive and, 3 therefore, a reason why they're prepared to register as 4 a charity. 5 Q. You identify that, all-in, you have 170,000 charities, 6 I understand, registered with you. So you have an 7 incredible spread of different sorts of organisation, so 8 religious bodies make up a part of that, but only a part 9 of that; is that right? 10 A. That's true, very true. It's important to stress the 11 huge diversity of that charitable sector. The number 12 only conveys that in part, but it's the breadth of 13 activities and nature of those organisations. In 14 a safeguarding context, that's quite an important point, 15 because there are hugely differing requirements as to 16 what you would expect one organisation to be doing 17 compared with another in a safeguarding context. 18 Q. So you would have an example -- let's think about the 19 religious settings and organisations. You could have 20 a very small house church with a dozen people who meet 21 in someone's home on a Sunday morning, and you could 22 also have something like the Church of England, which 23 has, you know, 700,000 people who go there -- in fact, 24 more than that, I think nearly a million people go to 25 church every Sunday there, and it has a massive</p> <p style="text-align: center;">Page 13</p>	<p>1 organisational structure and thousands of buildings. So 2 there's a vast difference in terms of size? 3 A. Yes. Again, that's an important factor to bear in mind, 4 that the proportionality of what we are asking very 5 small charities to do that are volunteer led, compared 6 to more, say, larger, professionally-resourced 7 organisations. 8 Q. Yes. So charities are run by trustees. In order to 9 sort of register as a charity, you have to agree that 10 there will be some people who are called trustees. Can 11 you explain whether or not there's any check on 12 someone's suitability to be a trustee before they're 13 appointed, and, if so, whether or not any of those 14 checks relate to people who may well have been involved 15 in sexual misconduct or sexual abuse against children or 16 vulnerable adults? 17 A. There are some checks that are undertaken as part of 18 the registration process, but we don't have routine 19 access to, for example, the sex offenders register. 20 Q. You also, as I understand it, don't have power to refuse 21 registration at the moment, on the basis of concerns 22 about safeguarding within an organisation; is that 23 right? 24 A. Yes. Could I just go back to the first -- sorry, your 25 last question, which is, the driver in terms of</p> <p style="text-align: center;">Page 14</p>
<p>1 the checks we can undertake is to require those that are 2 making the applications to -- where they're undertaking 3 services with adults at risk or children, is to make 4 certification statements that they have read our 5 guidance, understand it and have undertaken the 6 necessary DBS checks required for the post, and that's 7 subject, then, to -- any false declarations that they 8 make are a criminal offence under section 60 of 9 the Charities Act. 10 Q. So you don't do the checking yourself, but you operate 11 a system of self-certification, so that those 12 individuals check -- have to say, "We haven't been 13 convicted of any offences, we have read your relevant 14 guidance about safeguarding and we promise we will try 15 to abide by it"? 16 A. Yes. So within the framework of the current -- the 17 current registration framework, as you said, the 18 requirement to register is essentially a legal test. It 19 is not an activity- or a standards-based test. It 20 drives around or orientates around whether or not an 21 organisation is established for exclusively charitable 22 purposes for the public benefit and is subject to the 23 jurisdiction of the High Court. 24 Q. We could probably spend the rest of today talking about 25 the public benefit test and whether something is or</p> <p style="text-align: center;">Page 15</p>	<p>1 isn't subject to the jurisdiction of the High Court, and 2 I think probably only you and I would be interested in 3 that discussion, so I think we will pass over that, 4 because I don't think it is that relevant. But, yes, 5 I couldn't turn up tomorrow and say, "I'd like to set up 6 the Fiona Scolding Charitable Foundation to enrich 7 Fiona Scolding", and that wouldn't be able to be 8 registered. However, one of the aims of public benefit 9 is the promotion of religion of any sort, isn't it? 10 A. Yes. 11 Q. So if you wanted to register a charity, whether it's 12 a faith organisation itself or any sort of organisation 13 associated with religion, to do with the promotion of 14 religious belief, that would be something that could be 15 registered with the Commission? 16 A. Yes, in principle, subject to, as we said, a range of 17 other considerations about whether it is established for 18 the public benefit. 19 Q. Do trustees have any legal duties in respect of 20 oversight of child protection in the context of the 21 settings for which they are a trustee? 22 A. As part of their -- fulfilling their legal duties, 23 trustees must take reasonable steps to protect from harm 24 people who come into contact with the charity. So that 25 will include the charity's beneficiaries; if that's</p> <p style="text-align: center;">Page 16</p>

<p>1 a charity that's undertaking services with children, it 2 would extend to that. It also covers employees, 3 volunteers and those others that are connected with the 4 activities of the charity. 5 Additionally, they may also be subject to other 6 statutory duties and laws, by virtue of the activity or 7 the establishment that they're operating. 8 Q. I understand that. But I'm thinking, from the purposes 9 of that -- so you don't have any specific legal duty 10 about protecting children from harm. It is a general 11 duty to protect anyone from harm who comes into contact 12 with it? 13 A. Yes. That's correct. So it derives from the duty of 14 prudence. That's the requirement to act with reasonable 15 care and skill, and also the duty of a trustee to act in 16 the best interests of the charity while they're serving 17 as a trustee. 18 Q. Are both those duties enshrined in law, ie, by way of 19 statute or regulation, or are they just something which 20 has been adopted by way of common law principles? 21 A. They're derived from case law principles. 22 Q. I'm assuming that either you or the other regulators, in 23 the case of exempt charities, yes, exempt rather than 24 excepted, would be subject to regulating or ensuring 25 that trustees complied with that duty?</p> <p style="text-align: center;">Page 17</p>	<p>1 A. Yes, that's our principal focus, when we're -- in the 2 context of which we're looking in a safeguarding 3 context, we wouldn't necessarily be looking specifically 4 at child protection. It's the general -- how they're 5 taking reasonable steps to protect people from coming to 6 harm which, as I said, could include children or it may 7 include others as well. 8 Q. You've got some relatively new guidance, or you have got 9 some updated guidance, which sets out what charities and 10 trustees should be doing to safeguard and protect 11 people. That, chair and panel, is behind tab B28. 12 I'd like to, if I may, take you through this 13 document. I think it is the guidance that's issued 14 on October 2019. Danny, it's CYC000426_001. This is 15 the first page. Can I identify, was there any guidance 16 published about safeguarding and protecting -- don't 17 worry, Danny, about enlarging it at the moment, thank 18 you, though. It says "Published 6 December 2017, 19 updated October 2019". Was there any specific guidance 20 on child protection or safeguarding for charities prior 21 to 2017? 22 A. Yes, there was. It's one of the peculiarities of gov.uk 23 in terms of when it talks about the original date. So 24 that is not the original date of our very first use of 25 published guidance.</p> <p style="text-align: center;">Page 18</p>
<p>1 Q. Right. 2 A. It's been long standing, and I think -- I can't be 3 precise as to when the first guidance was ever produced 4 by the Commission, but I know our corporate records show 5 that it dates as least as far back as 2002. We have 6 regularly and progressively updated our safeguarding 7 guidance. 8 I think one of the reasons why it's linked to 2017 9 is that there was a major update, and it comes back to 10 your reference earlier to sort of statutory frameworks. 11 It is linked -- that date there is linked to the same 12 point at which we updated our overall safeguarding 13 strategy for dealing with issues in the sector. 14 Our feedback during that time, or in the lead-up to 15 that, was that many trustees were not paying due regard 16 to their safeguarding duties because they considered 17 that their charity wasn't undertaking regulated activity 18 or they weren't working with traditionally defined 19 vulnerable risk groups. 20 What we wanted to do was bring it back to the core 21 legal duty that we just spoke about, which is taking 22 reasonable steps to protect people from harm. 23 Q. Can I just double-check, is this guidance statutory 24 guidance, ie, do trustees have to follow it, or is it 25 simply advisory?</p> <p style="text-align: center;">Page 19</p>	<p>1 A. Well, we expect charities to comply with our guidance. 2 It's not explicitly regarded in the Act that they have 3 to have regard to it. I think the diversity of 4 the sector makes it impracticable. These are basic 5 principles. They're not intended to be exhaustive for 6 every different scenario that a charity might encounter. 7 It's a starting point. 8 We usually refer to requirements that are legal 9 requirements in our guidance as "must" and items of good 10 practice as "should". So it would be very difficult -- 11 and so there are -- you will often see in our guidance 12 that there are items of good practice rather than 13 mandatory legal requirements. It would therefore be 14 very difficult for us to say, "You have to follow this", 15 given, as we said, the diversity of the charity sector. 16 Q. Do you think it would be useful to have a statutory duty 17 to have regard to the guidance, at least in as far as 18 child protection and/or other safety issues are 19 concerned? 20 A. Yes, I don't think it would be problematic. In 21 practice, I think when we have engaged with charities, 22 the real -- we will look at the particular circumstances 23 to assess whether or not we think they're taking 24 reasonable steps to protect people from harm. As 25 I said, I don't think it would be problematic for making</p> <p style="text-align: center;">Page 20</p>

<p>1 it a requirement for charities to have regard to our 2 guidance. 3 One of the things we are doing at the moment is 4 looking at the sufficiency of our powers, and this is 5 one of the areas we are considering, along with a range 6 of others, which maybe we can talk about through the 7 course of this. 8 Q. Yes. I'm just making a quick note to make sure I don't 9 forget, in terms of your enlargement of your powers, but 10 maybe we will come on to that a little bit later. 11 Can we go to CYC000426_002, please. This is here, 12 you must take reasonable steps. We have talked about 13 that. That's the overarching duty. We will hold you to 14 account if you don't do it. Fair, open and positive 15 culture: 16 "We expect all trustees to make sure their 17 charity ..." 18 And we have a set of bullet points that go over to 19 the top of the next page. Danny, would you mind getting 20 those bullet points up, because all of them -- and on 21 the top of the next page as well. That would be really 22 helpful. 23 These are what I think you have already told us in 24 evidence you would consider to be the minimum things 25 that every charity should do.</p> <p style="text-align: center;">Page 21</p>	<p>1 A. Yes. 2 Q. Firstly, have appropriate policies and procedures in 3 place, which are followed by all trustees. If we can go 4 to -- in fact, no, don't worry, Danny, let's not go 5 there at the moment. Basically, what the guidance goes 6 on to say a bit later on is, those policies have to be 7 implemented and they have to be reviewed regularly. 8 That's basically what you say in a bit more detail. 9 A. Yes. 10 Q. Secondly, checks that people are suitable to act in 11 their role. So that is ensuring that people, in effect, 12 have appropriate DBS checks. Is that a particular 13 problem that you have noticed in respect of religious 14 organisations or charities which work with children, 15 that they're not very good at checking, or is it 16 something which is the exception rather than the rule? 17 A. I don't have any evidence to show that it occurs more 18 highly in religious charities than other organisations, 19 but we have certainly encountered evidence through our 20 compliance work that some faith-based organisations have 21 not undertaken the DBS checks that they should have 22 done. I think those are highlighted in a couple of 23 the inquiry reports in the bundle. 24 Q. We will come on to some of those. So there have been 25 some concerns about that. I think now might be an</p> <p style="text-align: center;">Page 22</p>
<p>1 appropriate time to ask you about, in your witness 2 statement, you have made some remarks around the scope 3 of the current legislation when it comes to DBS checking 4 and regulated activity. Does the Charity Commission, or 5 do you, have any particular views about the challenges 6 and limitations of the current DBS regime? 7 A. In respect of the DBS regime and how -- I touched on 8 earlier the limited definitions of "regulated activity" 9 then sit in the minds of trustees. As we said earlier, 10 a key part of our development of our safeguarding 11 strategy in 2017 was to -- we still give due regard to 12 the statutory framework where it applies to relevant 13 charities, but have encouraged trustees to think more 14 broadly about safeguarding and not to become too focused 15 on -- or unduly focused on whether or not their charity 16 undertakes regulated activity. 17 A specific aspect of the challenges that the DBS 18 checks create, we are on record as noting the challenges 19 that charities face with the current DBS regime, both in 20 terms of the complexity to the layperson of the current 21 regime, but the additional challenges it creates for 22 Safer Recruitment. 23 We should be clear, I think, that DBS is -- in 24 itself is not the sole management mechanism for 25 Safer Recruitment, but it's an important part of it.</p> <p style="text-align: center;">Page 23</p>	<p>1 These challenges were identified by us in the inquiry 2 report into Oxfam GB as an example. It is not faith 3 based, but it is a transferable and relevant point, 4 I think. 5 Q. Would you like to tell us about that, the problems 6 that -- 7 A. Yes. The vast majority of adult volunteering roles in 8 its UK shops, Oxfam GB is unable to lawfully seek the 9 type of criminal records checks that would reveal 10 whether a person applying for a volunteer role in one of 11 its shops is on a barred list. This is important 12 because their shops -- the volunteer base in its shops 13 comprises around 10 per cent of persons aged under 18. 14 So it's an important point because it is 15 a cross-sector challenge which affects a range of 16 different types of charities and institutions, and we 17 think it would be helpful if the current DBS framework 18 was revisited to see if we could strengthen the 19 Safer Recruitment process. 20 This is in three particular areas. One is the 21 definition of what constitutes regulated activity. 22 Q. How would you like to that change? What do you think -- 23 in a way, I'm asking you to make a decision, but what's 24 the current problem in respect of the definition of 25 "regulated activity" in respect of charities? What</p> <p style="text-align: center;">Page 24</p>

<p>1 would work better for them?</p> <p>2 A. I think it is more -- so you've heard from organisations</p> <p>3 that say, "We don't do regulated activity" --</p> <p>4 Q. Yes.</p> <p>5 A. -- "and, therefore, we don't need to worry about it",</p> <p>6 and that's not the point. Particularly in faith-based</p> <p>7 organisations, it's the people in positions of trust,</p> <p>8 who may not undertake regulated activities, particularly</p> <p>9 in those -- I might be using the word technically in the</p> <p>10 incorrect context, but if you could call them more</p> <p>11 closed communities, where there is a greater trust or</p> <p>12 relationship created between individuals, they don't</p> <p>13 have to undertake regulated activity in order to create</p> <p>14 that opportunity for abuse.</p> <p>15 I think the same goes to volunteers in</p> <p>16 organisations, faith-based or otherwise, where, by</p> <p>17 virtue of their work, whether that's voluntary or paid,</p> <p>18 creates the opportunity to harm children and adults at</p> <p>19 risk. Those are the issues. So that's why it's</p> <p>20 relevant, for example, to Oxfam as much as it's relevant</p> <p>21 to a faith-based organisation, and it's -- I think it is</p> <p>22 a significant cross-sector issue.</p> <p>23 Q. That was number one. You identified two other issues.</p> <p>24 I don't know whether or not you have covered those in</p> <p>25 the other?</p> <p style="text-align: center;">Page 25</p>	<p>1 A. Yes, they were my three, in terms of thinking about what</p> <p>2 constitutes regulated activity: people in positions of</p> <p>3 trust and then other persons who, by virtue of their</p> <p>4 work, can have the opportunity to harm children and</p> <p>5 adults at risk.</p> <p>6 Q. You, within your written witness statement, identify and</p> <p>7 helpfully extract a report that was written by various</p> <p>8 individuals on behalf of the NHS, indicating similar</p> <p>9 levels of concern they had about volunteering within the</p> <p>10 context of hospitals. I don't think we need to get it</p> <p>11 up, but it's CYC000450, and that recommended a much</p> <p>12 wider level of checking for NHS Trusts for exactly the</p> <p>13 same reason that you say charities need larger checking,</p> <p>14 which is the access they have to vulnerable individuals,</p> <p>15 without question, largely?</p> <p>16 A. I think -- so the issues that the Lampard and Marsden</p> <p>17 Report highlighted we recognise in the charities sector</p> <p>18 as well. That's why I said I think it's transferable</p> <p>19 across different sectors.</p> <p>20 Q. Can we now turn to the next bullet point, so to speak,</p> <p>21 which is set out in a little more detail in your</p> <p>22 guidance, that's CYC000426_007:</p> <p>23 "If your charity works with children or adults at</p> <p>24 risk, you should:</p> <p>25 "Establish good ... policies, ensure that everybody</p> <p style="text-align: center;">Page 26</p>
<p>1 follows with them", et cetera, et cetera, "which fit</p> <p>2 with the policies and procedures of your local authority</p> <p>3 safeguarding partner or safeguarding children or adults</p> <p>4 board."</p> <p>5 I was interested in that. So you would assume that</p> <p>6 the local charity would have a relationship with the</p> <p>7 safeguarding children's board or safeguarding partners</p> <p>8 and that they would use their services as and when</p> <p>9 required?</p> <p>10 A. Yes. Ordinarily, we would expect -- for those kinds of</p> <p>11 charities working with children or adults at risk.</p> <p>12 Q. And make sure all staff and volunteers receive regular</p> <p>13 training on child protection or working with children or</p> <p>14 adults at risk. What sort of training would you</p> <p>15 consider to be appropriate? I mean, obviously some of</p> <p>16 it varies upon the activity you're talking about, but</p> <p>17 would you consider that that is -- that has to be</p> <p>18 delivered by those who have some kind of level of</p> <p>19 expertise in child protection? Or could it be anybody</p> <p>20 that was delivering that training?</p> <p>21 A. Like you said, it's very difficult for us to be</p> <p>22 prescriptive about specifically what training an</p> <p>23 individual -- or the staff should receive in a charity.</p> <p>24 Ultimately, it has to be -- you know, come back down</p> <p>25 to the trustees. There's a level of responsibility here</p> <p style="text-align: center;">Page 27</p>	<p>1 on the trustees to make sure that that training is</p> <p>2 appropriate for the circumstances of their charity, and,</p> <p>3 as I said, I think it's really difficult for us.</p> <p>4 In the guidance that we are trying to communicate</p> <p>5 and promulgate through this mechanism, it's to try and</p> <p>6 get, as I said, some basic principles established in the</p> <p>7 minds of trustees about what they need to be thinking</p> <p>8 about. But it's very difficult for us to provide</p> <p>9 prescriptive guidance relevant to their individual</p> <p>10 charity, as we said earlier, because of the diversity of</p> <p>11 the sector.</p> <p>12 Sorry, there is another point to make, which is that</p> <p>13 previous -- you asked about previous iterations. This</p> <p>14 iteration of advice is, I think, about half the length</p> <p>15 of our previous safeguarding advice and guidance, and</p> <p>16 that was based on the feedback that we'd received from</p> <p>17 trustees, that they find a lot of the safeguarding</p> <p>18 guidance complicated and difficult to understand, so</p> <p>19 we've -- this iteration that we produced last year was</p> <p>20 about trying to distil this down into some core</p> <p>21 principles that we hope that trustees will find easier</p> <p>22 to establish and implement, even if it's not as</p> <p>23 exhaustive and comprehensive as many of us would like to</p> <p>24 see.</p> <p>25 Q. You would like it to be more comprehensive? You would</p> <p style="text-align: center;">Page 28</p>

<p>1 have preferred the longer version rather than the 2 shorter version; is that right, Mr Grenville?</p> <p>3 A. Well, I think that you -- what we are trying to do is to 4 drive up safeguarding standards amongst trustees, and 5 I think, if this works, in terms of making that drive, 6 even if there are some imperfections around the edges, 7 then I think we can regard that as a degree of success. 8 I'd like to register that, actually, this is now our 9 third-most popular piece of online guidance.</p> <p>10 Q. What's your most popular piece of online guidance?</p> <p>11 A. It's surpassed only by how to fill out an annual return 12 and the core trustee duties guide.</p> <p>13 Q. Right.</p> <p>14 A. So it shows that, actually, this is a really well-used 15 and read piece of guidance now. Something like 200,000 16 visits to it each year.</p> <p>17 Q. Can we go to CYC000426_009 now, please, Danny, which is 18 about "Handling and reporting incidents and concerns", 19 we see at the bottom of the page. This, again, is what 20 you would consider to be the absolute minimum that 21 a charity should be doing? This isn't good practice; 22 this is the baseline. Am I right in thinking all of 23 these standards are the sort of baseline standards? So 24 that's having proper records which are kept securely; 25 following your policies you've got; acting quickly;</p> <p style="text-align: center;">Page 29</p>	<p>1 reporting it to all relevant agencies and regulators in 2 full; be open and transparent; review what happened to 3 understand how to stop it from happening again?</p> <p>4 A. Yes.</p> <p>5 Q. I'm particularly interested, in the light of some of 6 the evidence we have heard this week, in the fourth 7 bullet point down: 8 "Report it to all relevant agencies and 9 regulators ..." 10 Who are the relevant agencies? I mean, there is 11 reference further down to reporting to the police if it 12 involves criminal behaviour, and you then, in fact -- 13 Danny, do you mind going to the top of the next page, 14 which identifies you have, in fact, got guidance on 15 reporting to the police, which I don't think we need to 16 get up, and the fact that you might need to report to 17 other regulators, and you may well need to send 18 a serious incident report to the Charity Commission. We 19 will come on a bit later to serious incident reporting 20 and how that works. 21 What happens -- if people don't report things to the 22 police or their relevant regulators, so, for example, 23 the local authority designated officer or Ofsted or, you 24 know, the CQC, depending on the nature of 25 the organisation, would that be something which could</p> <p style="text-align: center;">Page 30</p>
<p>1 result in compliance action being taken by the 2 Charity Commission?</p> <p>3 A. It depends on the circumstances -- it's very --</p> <p>4 Q. Yes, I know.</p> <p>5 A. It's very difficult to give you a "yes" or "no" or 6 a simple binary answer to this, because the 7 circumstances will depend on the case in hand. So you 8 will see from some -- you know, the inquiry reports, 9 where it forms a much broader and serious part of 10 mismanagement in the charity, then we've taken 11 regulatory enforcement action against those trustees. 12 In other circumstances, we may not do, and just simply 13 provide them advice.</p> <p>14 As an example, you know that there is no mandatory 15 duty to report to the police, so for us to then take 16 enforcement action when no statutory duty exists, it 17 would be beyond a reasonable use of our powers.</p> <p>18 Q. Then, again, if we could go over to _011, please, Danny, 19 CYC000426_011, there is an infographic -- I think it's 20 beyond the wit of the inquiry to find the infographic, 21 so we are just going to have the text version of 22 the infographic, which is what we can do. Again, this 23 is sort of a ten-point plan, really, isn't it?</p> <p>24 A. That base point that I was referring to earlier, that 25 we're trying to encourage take up and awareness of what</p> <p style="text-align: center;">Page 31</p>	<p>1 minimum safeguarding, good practice and a ten-point plan 2 is, again, another mechanism by which we would -- we 3 have sought to get trustees to focus on.</p> <p>4 Q. As far as safeguarding policies are concerned, are there 5 any requirements for those policies to be sent to the 6 Charity Commission or for any other information to be 7 sent to the Charity Commission about child protection? 8 You've obviously talked about an annual return. 9 I understand that's largely about finances and -- 10 financial prudence, rather, and financial management. 11 Is there any requirement in that annual return for child 12 protection or safeguarding information to be provided?</p> <p>13 A. Yes, they're required to disclose on the annual return 14 whether or not, for example, they have a safeguarding 15 policy in place and they're also required to make 16 a confirmatory declaration in respect of serious 17 incidents, which would cover safeguarding matters as 18 well.</p> <p>19 In relation to that first point, one of the pieces, 20 proactive pieces, of work that we did in 2018 was to map 21 those charities which are undertaking overseas 22 activities with vulnerable beneficiary types but said on 23 their annual return that they didn't have a safeguarding 24 policy in place and, as a result of that process, we 25 opened 21 proactive compliance cases into charities to</p> <p style="text-align: center;">Page 32</p>

<p>1 ensure that action was taken by the trustees. 2 I don't think it is entirely true to say that there 3 isn't, you know, safeguarding reference in the annual 4 returns. It's obviously a range of data that we're 5 seeking to obtain from charities at any particular time. 6 Q. So you say that they have to confirm that they have got 7 a policy. Do they have to send that policy in, or is it 8 simply sort of saying, "Yes, we have got one"? 9 A. It would be done on a case-by-case basis. So we will 10 require to see -- if we have engaged with a charity on 11 a safeguarding matter, we will often -- or usually, in 12 those kind of circumstances, we will require them to 13 supply us with their safeguarding policies and policy 14 frameworks. But, as a routine -- it is not routinely 15 asked for, and it's not, you know, for example, as part 16 of the annual return. Regulating 168,000 or 170,000 17 charities, we have to be risk led as a regulator. 18 Q. You said as well serious incidents. Perhaps now would 19 be sensible to talk about the serious incident regime, 20 if we start doing that. Sorry, I'll just move my papers 21 to -- we are taking it slightly out of turn, but I think 22 that's probably sensible. 23 What is serious incident reporting and when should 24 charities do it in respect of safeguarding concerns? 25 A. Could we pull up the annex that's got the serious</p> <p style="text-align: center;">Page 33</p>	<p>1 incident -- I don't know which tab it is. 2 Q. The safeguarding indicators? No, I don't think it is. 3 A. This is under tab 4, isn't it, "How to report a serious 4 incident"? 5 Q. Yes, B4, Danny. Sorry, Danny has put something up on 6 screen. He's being very helpful but, in fact, it is the 7 wrong thing. It is CYC000447_001, "How to report 8 a serious incident in your charity". The responsibility 9 to report -- could we get up, Danny -- this is the front 10 page. Could we get up _002 and _003, which is: what is 11 it, who should report, why and when to report. 12 A. Yes. Our guidance here sets out, as you see on page 2, 13 what we define as being a serious incident, which is an 14 adverse event, whether actual or alleged, which results 15 in or risks significant harm to charity's beneficiary, 16 staff, volunteers or others, loss of charity's money or 17 assets, damage to the charity's property or harm to the 18 charity's work or reputation. 19 In our guidance, we then go on to, as you said, talk 20 about who should report, and there is also an example -- 21 Q. Danny, would you mind taking that down? Yes, so who 22 should report, that should be the trustees, largely, 23 should report. You said there is a table. On that 24 point -- 25 A. Yes, so on that point, the --</p> <p style="text-align: center;">Page 34</p>
<p>1 Q. What (overspeaking) -- 2 A. -- (overspeaking) are legally responsible for ensuring 3 that serious incidents are reported relating to their 4 charity, because, as we discussed earlier, they are the 5 people that carry the legal responsibility for the 6 management and administration of the charity. 7 Q. If we go to "What to report", then, CYC000447_004 and 8 _005. I can see you've got what the main categories of 9 reportable incident are, and then you have got reporting 10 criminal activity, and then, Danny, can we go to the 11 next page, _006 and _007. One can see there is some 12 quite extensive guidance about protecting people and 13 safeguarding incidents. 14 A. Yes. There is also, if you look at page 7, a hyperlink 15 there which says an examples table. So it actually goes 16 into further detail, and it provides examples of what we 17 consider should be reported and examples of what we 18 consider it's not necessary to report. 19 This guidance was developed -- it's been 20 progressively developed, since its introduction in 21 around 2007, to provide greater clarity for trustees in 22 reporting serious incidents to us. 23 Q. But you still say at paragraph 75 of your witness 24 statement that there is significant under-reporting. 25 Can we get up CYC000371, please. It is behind tab B9.</p> <p style="text-align: center;">Page 35</p>	<p>1 This is a press release, as I indicate. Can we go to 2 _002. This is, in effect, an analysis of those reports 3 that you have undertaken between February and May. So 4 you received just over 1,000 reports. Most of them were 5 to do with potential harm to individuals, including, but 6 not limited to, sexual abuse or harassment, and nearly 7 half related to a child. Is that right? 8 A. Yes, correct. On that analysis, yes. 9 MS SCOLDING: You consider that, despite recent increases, 10 there is significant and systemic under-reporting of 11 incidents by charities working at home and abroad, 12 indicating that only 1.5 per cent of registered 13 charities have submitted any kind of incident reporting, 14 and only 0.9 per cent have reported a safeguarding 15 incident. It is concerned that, in particular, there 16 may be certain groups of charities in which 17 under-reporting is particularly prevalent. 18 Can we identify -- I think maybe it might be 19 sensible for us to come back to this after the break, 20 Mr Grenville, because there are a few questions I want 21 to ask you about this. 22 Chair and panel, I note the time. It is 11.30 am. 23 May we have a 15-minute break now, please? 24 THE CHAIR: Yes. We will return at 11.45 am. Thank you. 25 MS SCOLDING: Thank you very much, chair. Thank you very</p> <p style="text-align: center;">Page 36</p>

<p>1 much, Mr Grenville. Don't forget you are under oath, so 2 please do not discuss your evidence with anyone else. 3 Thank you. 4 (11.30 am) 5 (A short break) 6 (11.45 am) 7 MS SCOLDING: Mr Grenville, we were, just before the break, 8 looking at the serious under-reporting, shall we say, of 9 serious incident reporting. I feel as though there 10 should be some sort of ditty said after that. 11 You indicate, furthermore, in your witness statement 12 that there have been just over 1,000 serious incident 13 reports from non-Anglican and non-Catholic organisations 14 since 2013, of which 88 per cent were to do with 15 safeguarding, and there has been a sharp rise in 16 reporting from 2014. 17 Can we maybe get that particular passage up, that's 18 CYC000440_034, please, Danny. It is paragraphs 167 to 19 170. These are the entire number of reporting serious 20 incidents received from religious organisations and 21 settings which weren't Roman Catholic and weren't 22 Anglican, because we have got those figures from our 23 other investigations. 24 Can we have a look at those now? One can see 74 in 25 2014, 406 in 2018/2019. Again, 39 of the 74 were about</p> <p style="text-align: center;">Page 37</p>	<p>1 safeguarding, and now 379 out of the 406 are about 2 safeguarding, and you've identified the distribution, 3 because you give "safeguarding" quite a wide meaning, so 4 obviously a lot of those won't involve children. 5 I can see that the vast majority of them, however, 6 involve religious activities, and safeguarding and child 7 protection concerns in respect of religious activities. 8 What is meant by that? 9 A. Well, it has quite a broad classification. So it could 10 be an activity that's sponsored by a religious body 11 rather than being -- it doesn't -- I suppose the point 12 is, it doesn't exclusively relate, for example, to 13 religious worship, so it's quite a broad and general 14 term, and it's based on the classification that the 15 charity itself completes on the register about whether 16 or not it considers it undertakes religious activities 17 of some shape or form. 18 Q. So, looking at this data, you still consider that there 19 is a significant degree of under-reporting, and you have 20 identified that, in some organisations -- what your 21 press release said is that, "There may be certain groups 22 of charities in which under-reporting is especially 23 prevalent", was what I'm reading directly from the press 24 release there. Do any of the charities where 25 under-reporting is particularly prevalent include those</p> <p style="text-align: center;">Page 38</p>
<p>1 which are religious organisations which may perform 2 activities with children? 3 A. Potentially, because roughly 20 per cent of 4 the organisations or charities on the register record 5 that they undertake some form of religious activity. 6 The proportion -- 12 per cent of the RSIs that were 7 analysed by the safeguarding task force came from that 8 group. So, broadly, very crudely, if one were to assume 9 that one would expect to see a rough correlation between 10 the proportion of charities on the register for that 11 subsector versus the RSIs, then one could say that there 12 is a proportion of under-reporting coming from 13 faith-based organisations. 14 What I would say is that that improving trend that 15 you have highlighted in the table is continuing. While 16 I don't specifically have the RSIs for the religious 17 organisations, what I can confirm is there was yet 18 a further increase in 2019/20, so that we had, in total, 19 5,730 RSIs submitted to the Commission of which 20 60 per cent related to safeguarding. 21 That, as I said, is all charities, and not just 22 religious organisations, but a broad analysis shows that 23 the uplift in trend in reporting in faith-based 24 organisations is continuing alongside other subsectors. 25 Q. Right.</p> <p style="text-align: center;">Page 39</p>	<p>1 A. In total, without the work that we have been trying to 2 do to improve trustees' understanding of guidance and 3 criteria that they should work to, as well as raising 4 awareness of reporting serious incidents, the number of 5 charities that has reported has more than doubled since 6 2016/17. So I think there's -- when we look at, you 7 know, safeguarding performance, there's essentially two 8 camps, aren't there? There are those that maybe don't 9 understand and it is about awareness and knowledge and 10 encouragement, and then there's the resistant quarter 11 who don't want to comply and have a problem dealing with 12 statutory regulators for whatever their cultural -- you 13 know, for particular cultural reasons. 14 I think what this is showing is that the 15 encouragement and awareness raising is having an effect. 16 There's still obviously further work -- it's not to say 17 there isn't further work to be done on this, but we have 18 been working very hard on this over the recent years, 19 and we are seeing the effects of it, and it's not -- as 20 I said, you can't just simply attribute it, for example, 21 to the international aid -- 22 Q. Crisis? 23 A. -- crisis that occurred in 2018. This has continued 24 beyond that. Even year on year, we are 47 per cent up 25 year on year.</p> <p style="text-align: center;">Page 40</p>

<p>1 Q. Because my understanding is, you say elsewhere in your 2 witness statement that the amount of safeguarding work 3 you have undertaken has risen significantly since 2018, 4 so the reports have risen from 1,500 to 2,500, so that's 5 a 38 per cent increase, and you have opened 764 6 safeguarding cases in 2018, compared to 552 in 2017.</p> <p>7 A. That's correct, yes.</p> <p>8 Q. You also identify that you have taken more of a focus, 9 would it be fair to say, of the Charity Commission on 10 safeguarding issues than maybe there was ten years ago? 11 Would you agree with that?</p> <p>12 A. I think it's a focus. I think we've -- as I touched on 13 earlier, we have shifted our definition and tried to 14 bring our focus on safeguarding work back to core legal 15 duties of a trustee. As you said, that means, then, 16 moving beyond simply statutory definitions of risk -- 17 you know, traditional risk groups or, like I said 18 earlier, statutory definitions of what might be 19 regulated activity.</p> <p>20 We have also -- in doing so, we have obviously 21 extended the definition of what we mean by 22 "safeguarding", which is probably broader than, as we 23 talked about, some statutory frameworks, but that's been 24 a deliberate intent on our part.</p> <p>25 Q. You have talked about the fact that part of this is</p> <p style="text-align: center;">Page 41</p>	<p>1 because you're engaging religious organisations more. 2 As I understand it, you have a specific kind of 3 religious organisation engagement team, so to speak. 4 What's their job and how have they helped with 5 increasing and improving the registration of charities 6 and the regulation of them, if you could tell us 7 a little bit about that?</p> <p>8 A. Sure. The Charity Commission has a small faith outreach 9 team, comprising of three full-time staff and three 10 part-time staff, which engages with charitable religious 11 organisations and settings. Their objectives are 12 essentially to promote good governance on key topics, 13 which includes safeguarding, although it is not limited 14 to safeguarding. It covers, also, financial management 15 and other topics. We try and work with some of those 16 organisations to support them to register as charities.</p> <p>17 The outreach team works across the five main areas 18 of faith -- Islam, Hindu, Buddhism, Christianity and 19 Judaism.</p> <p>20 In terms of the work it's undertaken, we are 21 a significant referral source for SFI. I believe that 22 we represent now something like 20 per cent of 23 the referrals made to the SFI network.</p> <p>24 Q. That's the Strengthening Faith Institutions network? 25 A. Yes.</p> <p style="text-align: center;">Page 42</p>
<p>1 Q. So what, they come to see Strengthening Faith 2 Institutions and then Strengthening Faith Institutions 3 pass them to you to register --</p> <p>4 A. The other way around.</p> <p>5 Q. The other way around.</p> <p>6 A. We are a referral source to SFI. We establish good 7 relationships with faith umbrella membership bodies. As 8 an example, our faith -- so current examples of our work 9 there -- the team are currently working with DBS and SFI 10 on guidance on access to DBS checks for specific posts 11 within different faiths. The example there is being 12 Islam, Judaism and Sikhism, which comes back to the 13 point we were discussing earlier about the complexity of 14 the DBS system to volunteers and lay people and helping 15 them to try and navigate through that a bit easier, 16 understanding what DBS checks they can undertake in 17 relation to specific posts that might occur in their 18 faith group.</p> <p>19 They currently have 108 cases open with faith 20 institutions with regards to potential registration, and 21 we would estimate that they have been successful in 22 supporting registration for about 100 faith charities, 23 63 of those directly on a one-to-one basis, and then 24 others I would estimate indirectly by work through the 25 umbrella groups.</p> <p style="text-align: center;">Page 43</p>	<p>1 One of the challenges that -- obviously, we are not 2 unique in this -- we faced through COVID-19, is we have 3 had to shift our engagement methods. So, for example, 4 during July this year, we delivered three webinars with 5 partner bodies which included setting out expectations 6 on safeguarding requirements. They are planning 7 a series of somewhere between 12 and 15 webinars over 8 the rest of the year, which will either be joint working 9 with specific umbrella groups in each of the major 10 faiths on governance, which will include safeguarding in 11 each case, or general webinars open to all faith 12 institutions, which includes webinars on safeguarding as 13 well.</p> <p>14 Q. When you're seeking and encouraging people to register, 15 are you making sure that, for example, you're saying to 16 them, "You must have a safeguarding policy before you 17 try and register with us", or would you think about 18 maybe trying to implement something at the very least 19 for new charities to say, "We need to see your 20 safeguarding documents before you can register with us", 21 or is that impractical?</p> <p>22 A. We make sure that they're aware of the expectations of 23 what it is to be a charity, and then, obviously, they're 24 made aware of our safeguarding guidance. Without 25 wishing to repeat what we discussed earlier, the</p> <p style="text-align: center;">Page 44</p>

<p>1 difficulty is then making sure it's relevant to each 2 individual charity.</p> <p>3 The point is that we would make them aware of 4 the general minimum principles that we expect charities 5 to operate to.</p> <p>6 Q. The work you've done with Strengthening Faith 7 Institutions, what has it further helped you to find out 8 about this particular sector, so the religiously 9 conservative, shall we say, registered charities sector, 10 so to speak, and what assistance has the insight of that 11 given you into making child protection better in this 12 context, if any?</p> <p>13 A. Well, I would say it's more -- probably a more general 14 point of knowledge from not just the work of the faith 15 outreach team but also our other work when we engage 16 with faith-based organisations.</p> <p>17 I think -- what we have certainly learnt is that -- 18 and as you highlighted in your opening statement, the 19 fragmented nature of the faith network makes engagement 20 quite labour intensive and difficult. On a one-to-one 21 basis, I think it shouldn't be underestimated how much 22 effort is required to help equip individual 23 organisations to become charities, and that's recognised 24 through the work and the numbers that the faith outreach 25 team have been delivering.</p> <p style="text-align: center;">Page 45</p>	<p>1 What we have seen is other challenges, for example, 2 around English is often not the first language, and 3 given the fact a lot of the core guidance is based in 4 English, trying to then make sure that's understood can 5 be a challenge.</p> <p>6 Q. You don't have it translated automatically into other 7 languages, then, other than Welsh?</p> <p>8 A. We do have that facility, so we offer a facility -- 9 a translation facility, if needed. But that applies 10 generally across all of our work.</p> <p>11 There is often a mistrust by some of these 12 faith-based groups in statutory organisations, so 13 there's a process of having to win hearts and minds to 14 persuade them, both in terms of adoption of standards 15 and, for example, registering as a charity, to overcome 16 some of that mistrust that exists with statutory 17 agencies.</p> <p>18 Q. How closely do you work with other government agencies, 19 so, for example, Ofsted or the Department for Education, 20 who would be the obvious people where things might come 21 under their radar in respect of charities. Do you have 22 information sharing protocols and agreements with them 23 to make sure that you're all --</p> <p>24 A. Yes.</p> <p>25 Q. You know or have the same information?</p> <p style="text-align: center;">Page 46</p>
<p>1 A. Yes, we do. I would say it's an example of how, again, 2 our approach to safeguarding work has improved and 3 developed over the years. Over the last three years, 4 our information sharing with other agencies has 5 increased by more than 50 per cent, but actually 6 safeguarding-related information exchanges have doubled 7 over that period.</p> <p>8 We have what's called a statutory gateway, so within 9 the Charities Act there are provisions for us to share 10 information relevant to respective roles within the 11 Charities Act, and we have, in some instances, 12 supplementary MOUs which also help to define the 13 protocols.</p> <p>14 There are obviously always areas where we are 15 seeking to improve, and we will look at -- we are 16 looking at areas where we can improve information 17 exchange with some other agencies.</p> <p>18 Q. I know historically there have been concerns, for 19 example, that have been raised in this investigation -- 20 particularly I'm thinking around some of the other 21 religious organisations, in terms of maybe the 22 Department for Education knowing but you not necessarily 23 being told of the position. Has that now been clarified 24 and are there now clear lines of communication? So if 25 there were to be safeguarding concerns related to</p> <p style="text-align: center;">Page 47</p>	<p>1 a registered charity that were brought to the attention 2 of Ofsted or the Department for Education, they would 3 then be passed to you so you could have a look at them 4 from your perspective, or does that not happen routinely 5 at the moment?</p> <p>6 A. No, it does. My experience of it is that, if that 7 happens, it's on an isolated basis.</p> <p>8 Q. Right.</p> <p>9 A. But, nevertheless, like I said, we are seeking areas 10 to -- in a way that we can strengthen our engagement 11 with other agencies and ensuring that we're working at 12 an early enough stage in the process if there's 13 improvements that are required with a particular 14 institution for joint working. I know it's not 15 necessarily part of your investigation, but a good 16 example of that was Ampleforth, where we were working 17 very closely with DfE, ISI, North Yorks Safeguarding 18 Board, North Yorks Police, on a multi-agency approach to 19 dealing with child protection issues at Ampleforth.</p> <p>20 Q. Can I identify that, when we are dealing with charities' 21 ability to manage child protection effectively, you 22 identify in your witness statement that policies are 23 only one part of an issue. You identify that there 24 needs to be an appropriate culture, and you also talk 25 about the idea of the fact that sometimes there is</p> <p style="text-align: center;">Page 48</p>

<p>1 a cultural deficit. Can we get up, Danny, please, 2 CYC000440_028, please. You set out some examples of 3 that cultural deficit at paragraph 134 of your witness 4 statement. Chair and panel, behind tab 1 of your 5 bundle. 6 A. Yes. That's absolutely right. I know it's quite an 7 amorphous term, "culture". 8 Q. Yes, it is. 9 A. The best way to try and kind of describe where you look 10 at, or one looks at, successful organisations where 11 safeguarding runs as a core throughout the veins of that 12 organisation, ultimately, it's cultural. We recognise, 13 you know, the value of developing template policies and 14 other sort of standard documents, but I think we would 15 share Ofsted's views on this, that it's only a starting 16 point, and there is an inherent risk around that 17 approach, that it becomes a checklist. If you look at 18 some of our enquiries, or most of our enquiries, the 19 majority of those enquiries, those organisations already 20 had policies and procedures in place. The reality was 21 that they either weren't being maintained properly, 22 there was insufficient oversight by the trustees or the 23 leadership team in that charity, or that they, you know, 24 in practice, were not abiding by those policies and 25 procedures. That's, I think, what we mean around the</p> <p style="text-align: center;">Page 49</p>	<p>1 culture in the organisation. 2 Q. As part and parcel of looking at the culture, I'm 3 assuming that that's something that I think we will come 4 on to in terms of recommendations a bit later. I'd like 5 to turn now, if I may, to the compliance and enforcement 6 work you do. So, firstly, I would like to ask you 7 a little bit about what you do, and then I'd like to ask 8 you about possibly some recommendations for the future. 9 Firstly, if, for example, a charity said to you, "We 10 don't have a safeguarding policy", would that be 11 something where you would seek to take compliance action 12 against them, and can you tell us a little bit about 13 when you would take compliance and enforcement action 14 and what you can do? 15 A. It would be risk based, in terms of its analysis, and 16 the considerations would have to take into account, 17 obviously, what activities and risks were prevailing 18 with that particular charity. 19 So if we identify that that is a material issue, 20 then we're likely to open -- I would expect, under our 21 risk framework, that we would open a compliance case. 22 We would then require them to take professional 23 advice to develop an appropriate policy and framework. 24 Q. By "professional advice", what would you mean by that? 25 A. I say professional expert advice, so somebody who is</p> <p style="text-align: center;">Page 50</p>
<p>1 competent in advising that charity on the safeguarding 2 risks in its organisation. Obviously, if it is an adult 3 at risk, that might be a different individual to an 4 organisation that's exclusively providing services to 5 children. 6 Q. Please could you identify, for the purposes of those who 7 are less than familiar with your powers, what your 8 powers are regarding compliance and enforcement for 9 child protection related breaches? 10 A. If we are operating what we call a compliance case, 11 which is a regulatory case which is sitting outside of 12 the statutory enquiry framework, we would normally rely 13 on what we call a section 15 regulatory advice, so we 14 would give them an action plan and expect them to comply 15 with that action plan. 16 If the matters are so serious that it goes into 17 a section 46 inquiry, so a statutory inquiry -- 18 Q. When can something be so serious that it would go into 19 a statutory inquiry? 20 A. Well, it would be -- it's based on risk and whether or 21 not we think it -- there are a number of factors in 22 determining whether or not we open an inquiry, but it 23 will be, in essence, proportionally based on risk and 24 whether or not we consider that is the most effective 25 mechanism for us to resolve the regulatory concerns.</p> <p style="text-align: center;">Page 51</p>	<p>1 The vast majority of our compliance work, for 2 example, is conducted outside of the framework of 3 a statutory inquiry, and it's reserved for the most -- 4 what we would call the most serious cases, some examples 5 of which are provided in the evidence bundle and which 6 your panel may be aware of from the reports that we have 7 published on charities like RNIB or Oxfam, Save the 8 Children and the like. 9 Q. I think maybe we will come to those in a minute. The 10 powers you have -- but, as I understand it from your 11 witness statement, you identify that approximately 12 22 per cent of all your statutory inquiries have been 13 about religion. So you have had 137 statutory inquiries 14 about religion, but only 13 of them have a safeguarding 15 component, and three of them relate to Roman Catholic 16 charities. So there are nine non-Roman Catholic 17 charities against whom a statutory inquiry has been 18 identified. 19 A. Mmm-hmm. 20 Q. As I understand it, you also say that the number of 21 statutory inquiries has gone up hugely over the past 22 decade, so you've gone from issuing about ten statutory 23 inquiries a year to about 100 each year. Why is that? 24 A. That's partly a shift in our regulatory approach to 25 being more robust in how we felt we needed to tackle</p> <p style="text-align: center;">Page 52</p>

<p>1 regulatory concerns, and partly an increase, I think, in 2 issues that were -- you know, serious issues that were 3 being flagged -- or coming to the Commission's 4 attention.</p> <p>5 Q. How do cases come to your attention? Do you have any 6 proactive way of finding out whether there are problems, 7 or, largely, do you rely upon either statutory 8 authorities telling you or being guided by what may 9 appear in the newspapers?</p> <p>10 A. There's a mixture of sources. There is a proportion of 11 work that we do identify which is proactive based on 12 information that we hold and identification of risk in 13 certain areas.</p> <p>14 At the moment, I would estimate that that sits at 15 around 10 per cent of our regulatory casework, but, as 16 we have outlined in our strategy, we are committed to 17 increasing the proportion of proactive work that we 18 undertake and proactive thematic work that we undertake.</p> <p>19 Q. Largely, in the past, it's been a case of somebody 20 coming to you, but you're trying to seek steps to try 21 and find out a bit more by asking the charities probing 22 questions rather than relying on somebody saying that 23 there's a problem and whistleblowing or there being 24 a report in the paper or something like that?</p> <p>25 A. Yes. I think there's a huge amount of preventative or</p> <p style="text-align: center;">Page 53</p>	<p>1 follow-on work that we do. I mean, an example -- again, 2 it is not directly related to your investigation work 3 stream -- if you take the Roman Catholics, for example, 4 on the back of the Ampleforth College and Birmingham 5 Diocesan Trust issues, I wrote to Cardinal Nichols and 6 we requested or engaged them with 21 diocesan trusts 7 around the consistency and application of standards 8 across those trusts.</p> <p>9 I touched earlier on, for example, some of that 10 proactive work that we did around charities that had 11 safeguarding policies that recorded that they were 12 working with vulnerable beneficiaries overseas.</p> <p>13 So there is lots of proactive work that we are 14 doing. What we are trying to do is incrementally 15 improve, through this strategic plan, the amount of work 16 that we are doing through that mechanism.</p> <p>17 Q. Part of that is, as I understand it, you have gone from 18 not really having a safeguarding team to having 19 a safeguarding team from January 2019, and you now have, 20 or you have had from 2017, somebody in-house that has 21 a background in child protection, so that they're able 22 to provide you with some more direct advice about 23 whether things are going horribly wrong or actually are 24 on the right track. Is that right?</p> <p>25 A. I wouldn't quite express it in that term, because</p> <p style="text-align: center;">Page 54</p>
<p>1 I would say that we have always had, and certainly while 2 I have worked for the Commission, people who have had 3 expertise in how we apply or manage safeguarding in the 4 context of our regulatory role. What we recognised was 5 that we wanted to develop our capabilities further and 6 to have -- the difference is that we now have resource 7 that's virtually dedicated to the development of -- 8 safeguarding development work, and, as you said, there 9 also is additional expertise, that's true. So, for 10 example, in now having a senior specialist safeguarding 11 lead and a deputy that we now have a specialist referral 12 service for our case officers on the more particularly 13 complex and higher risk work, and a priority area, for 14 example, for them at the moment is updating and 15 consolidating the safeguarding guidance that we produce 16 for our case officers, and that's something that we 17 would have struggled, just from a bandwidth and capacity 18 point of view, we would have struggled with without 19 having those two personnel there.</p> <p>20 Q. But you've only got two people, and you've got 168,000 21 charities?</p> <p>22 A. But the point is that those two people are not there to 23 service the 168,000 charities. They're there to support 24 the development of the capability within the Commission, 25 and the Commission has 400 staff.</p> <p style="text-align: center;">Page 55</p>	<p>1 Q. We have talked a little bit about statutory inquiries. 2 Ultimately, you can disqualify individuals from being 3 trustees; appoint something called an interim manager, 4 so, in other words, appoint somebody who, in effect, 5 takes over the charity for a period of time. As 6 I understand it, the first time you did that solely 7 about child protection was in March 2018, when you did 8 that for Ampleforth College.</p> <p>9 As I understand it, there is a specific power which 10 was introduced in 2016 to disqualify individuals as 11 charity trustees if they posed a safeguarding risk. 12 I understand you've exercised this power twice since 13 it's been in force. Can you tell us a little bit 14 about --</p> <p>15 A. Sorry, just to be clear, the disqualification power 16 isn't explicitly linked to where an individual poses 17 a safeguarding risk, it's a more general power around 18 their fitness to serve, essentially.</p> <p>19 Q. Okay.</p> <p>20 A. So in using that disqualification power, we deliberately 21 removed people from charities who we considered to be 22 a risk to children, and there are other examples 23 where -- I mean, I think it's actually broader than that 24 now. At the time, I quoted two, but, you know, you can 25 see from the inquiries that have been referenced in the</p> <p style="text-align: center;">Page 56</p>

<p>1 witness bundle where we disqualified trustees in other 2 inquiries where there's been safeguarding concerns. 3 Q. The other interesting point that I think emerges from 4 your witness statement is, we have talked about the 5 serious incident reporting form, which is meant to be 6 a way of you getting compliance and oversight of what's 7 going on, but you said, at the moment, in most cases of 8 non-compliance, you don't find out about it through the 9 reporting serious incident form, so the people who are, 10 shall we say, conscientious will report serious 11 incidents to you and will largely have dealt with it 12 appropriately, but those who don't want to won't, and 13 you have to find out about it through other ways. Is 14 that right? 15 A. In some cases, but then not all of the mismanagement 16 might be resulting in a single serious incident. 17 I think it's difficult to put it in those terms. 18 Q. Okay. 19 A. What we can say is, and as I think I indicated in the 20 witness statement, that following the reforms that we've 21 made to the serious incident report forms that trustees 22 and charities have to fill out, we now get sufficient 23 information to make an assessment on those cases in 24 90 per cent of cases with the initial information that's 25 supplied.</p> <p style="text-align: center;">Page 57</p>	<p>1 Q. If we could just talk briefly about some of 2 the statutory inquiries which are to do with religious 3 organisations and child protection, so I just wanted to 4 look at the flavour of the work that you have been 5 involved with over the past few years, the first one of 6 those was the Gilbert Deya Ministry, which is, as 7 I understand it, to do with child trafficking. Can you 8 just tell us a little bit about this and the steps that 9 you took? 10 A. Well, actually, it wasn't to do with child trafficking, 11 the initial prompt was -- from memory, was to do with 12 olive oil being promoted as a pregnancy aid. 13 Q. If I could just indicate, Gilbert Deya Ministries were 14 an Evangelical Pentecostalist organisation run by 15 Mr Gilbert Deya, both in this country but also in other 16 countries, but it was registered as a charity in this 17 country, so you undertook compliance action, firstly, 18 about whether olive oil was an appropriate -- was it 19 a pregnancy aid or an aid -- 20 A. I think that was the original -- one of the original 21 grounds for opening the inquiry. I think there were 22 other factors involved. That inquiry, at the moment, 23 remains ongoing. 24 Q. Right. 25 A. But what I can confirm is that we have sought</p> <p style="text-align: center;">Page 58</p>
<p>1 improvements to the charity's safeguarding policies as 2 part of that inquiry. We are currently seeking 3 assurance that these have been implemented as part of 4 a range of ongoing engagement with them. 5 Q. Then the next one is the Essex Islamic Academy, which, 6 in fact, is a school. We have some information about 7 that in the bundle behind tab B16. CYC000438_001. 8 This, I think, is more commonly known -- could we go to 9 _002, please. This, I believe, is more commonly known 10 as the Ripple Road Mosque. Could you tell us a little 11 bit about why you launched this statutory inquiry, what 12 you found and what you then did? 13 A. The inquiry was initially mobilised because of 14 notification of a serious incident that one of 15 the individuals had been charged with terrorist 16 offences, which I think is set out on page 2. 17 Q. Yes. 18 A. We then mobilised an inquiry which looked at the 19 governance and management of the charity, including how 20 they were applying their safeguarding policies, as well 21 as financial controls. 22 We found weaknesses in the supervision of 23 the individual who had been charged with the terrorist 24 offences -- 25 Q. Let's have a look.</p> <p style="text-align: center;">Page 59</p>	<p>1 A. He'd moved from effectively being in a support role to 2 what we would consider to be undertaking regulated 3 activity that they, as far as I'm aware, had not sought 4 appropriate checks on that individual and neither were 5 they appropriately supervising him. 6 Q. Can we have a look at _006, Danny, and _007, which sets 7 out the issues. We have got, at the bottom of the page, 8 that you asked the trustees for various information 9 about who this individual was, what role he played. 10 Danny, I don't think we need that up. Thank you for 11 outlining that. And then, despite -- if you could 12 outline, please, "Despite the Commission's regulatory 13 engagement with the charity", so that's the second 14 paragraph on _007, please, Danny. In other words, you 15 weren't told that he was actually teaching, and the 16 trustees weren't transparent about that particular 17 information, or didn't know in respect that that was 18 what was going on? 19 A. That's the point about whether or not adequate 20 supervision was being exercised by the trustees. 21 Q. Yes. If we can go to _008, please, Danny, and get up 22 the paragraph starting, "On 9 November 2017" and those 23 points. They were somewhat ill-informed, including 24 reference being obtained. The former trustee's response 25 confirmed that there was no due diligence prior to the</p> <p style="text-align: center;">Page 60</p>

<p>1 individual taking up employment with the charity, no 2 formal contract of employment, no references. They 3 weren't aware that a DBS check was required and they 4 failed to obtain somebody's signature on either of 5 the child protection policies that the charity had in 6 place. 7 Obviously this wasn't an issue which was anything to 8 do with child sexual abuse, but it raises issues around 9 understanding of basic child protection standards and 10 policies, which obviously could impact upon child sexual 11 abuse, and just to indicate that the individual 12 concerned was either convicted or pleaded guilty to 13 various preparatory acts because he had, in fact, shown 14 the children at the mosque various videos of beatings 15 and other violent and terrorist-related activity 16 relating to the conflict in Syria; is that right? 17 A. Yes. He was showing them inappropriate videos. It's an 18 example, as we talked about earlier, about, you know, 19 insufficient knowledge, skills and experience of what 20 are appropriate safeguarding arrangements, as well as 21 inadequate oversight by the leadership and trustees. In 22 particular, I think, you know, insufficient effort to 23 ensure adequate assurance and compliance with basic 24 standards. We see that in other examples of our inquiry 25 work.</p> <p style="text-align: center;">Page 61</p>	<p>1 We have to, you know, say that these are the more 2 extreme and serious cases that we see and you can't 3 necessarily draw a conclusion that that kind of extreme 4 mismanagement or serious mismanagement is reflective of 5 the sector at large. 6 Q. But this is the most serious end of the problems that 7 you encounter? 8 A. Yes. 9 Q. So they are small in number, but obviously the nature of 10 the lack of compliance is very dangerous, maybe, even, 11 for the children concerned? 12 A. Of course, and that reflects the seriousness with which, 13 and the robustness with which, we took regulatory 14 action. As you will see from the report, we appointed 15 an interim manager and the trustees concerned have been 16 disqualified. 17 Q. Can I ask you about another report, which was to do with 18 the Rigpa Fellowship, which is behind tab B23. Now, 19 Rigpa is a Buddhist organisation which -- I think it was 20 largely founded in the west, but practices a form of 21 Tibetan Buddhism, and there were various allegations 22 that I understand were made against the Tibetan monk who 23 founded the organisation, or who was certainly a prime 24 mover within the organisation, in respect of sexual and 25 physical abuse against students of the charity.</p> <p style="text-align: center;">Page 62</p>
<p>1 Again, in respect of this, could you just tell us 2 a little bit about what the concerns were and what you 3 then did as a result of those? 4 A. So the allegations that were made raised concerns about 5 the adequacy of safeguarding arrangements and raised 6 concerns for us as to whether or not the trustees were 7 discharging their core legal duties that we referred to 8 earlier. 9 The inquiry, through its investigation, identified 10 serious concerns that, in particular, one individual was 11 in knowledge of these incidents but had failed to act to 12 address them. In fact, we have disqualified two of 13 those trustees, who were involved in that process, from 14 acting, and they have now been removed. 15 That inquiry is ongoing, so we are currently seeking 16 further assurances from the current trustees on their 17 ability to keep people safe when coming into contact 18 with the charity. These kind of cases, normally, in 19 addition to any kind of disqualification action that we 20 may take, can often result in what we call a section 84 21 direction. 22 Q. What is that? 23 A. A direction to undertake specific actions to strengthen 24 or improve the arrangements within a charity. 25 So you will see that throughout -- I think there may</p> <p style="text-align: center;">Page 63</p>	<p>1 have been other inquiries that you have got in the 2 bundle where a section 84 direction has been issued, and 3 then we will monitor and engage with the charity to 4 ensure that the section 84 direction has been 5 implemented. 6 Q. You currently have a live ongoing investigation into the 7 Christian Congregation of Jehovah's Witnesses, or 8 The Watchtower, I believe it is, in fact, the 9 investigation is. You also undertook an investigation 10 into the Manchester New Moston Congregation of 11 Jehovah's Witnesses, something we looked at with 12 Mr Gillies of the Jehovah's Witnesses a few weeks ago. 13 I'd just like to ask you a couple of questions about 14 the Manchester New Moston report. I identify a note -- 15 it is behind tab B26, chair and panel, the report. You 16 may remember we looked at it on Tuesday afternoon. But 17 I'd like to ask you a few questions about it from your 18 perspective, please, Mr Grenville. Firstly, I'd like to 19 ask you -- Danny, would you mind getting up 20 CJW000096_007. We know that you made various findings 21 about the absence of safeguarding policies and various 22 concerns that there were, and I am going to put a couple 23 of questions to you about those in a moment. "Conduct 24 of the inquiry and related litigation". You identify 25 specifically within this document that one of your</p> <p style="text-align: center;">Page 64</p>

<p>1 concerns was the conduct and length of the inquiry has 2 been significantly affected by litigation. Now, I think 3 I should probably put to you, on behalf of 4 the Jehovah's Witnesses, that a lot of your inquiries do 5 take quite a long period of time, so a number of years, 6 to be completed. Is it really fair for you to have said 7 that at least part of the reason for the delay was what 8 the Jehovah's Witnesses would consider to be the 9 perfectly legally appropriate route of seeking not to 10 have the inquiry opened on the basis that it was, 11 I believe, a fishing expedition? Do you have anything 12 you want to say about that?</p> <p>13 A. Yes. We clearly recognise the right of charities to 14 challenge our decisions when they think that we have got 15 it wrong, but we are on record as saying, in particular 16 in respect of the Manchester New Moston and 17 The Watchtower inquiries, that the level of legal 18 challenge that we received, which I think numbered five 19 in two years, is simply unprecedented.</p> <p>20 In the instance of -- I think it is separate for 21 Watchtower, but in the instance of the Manchester 22 New Moston inquiry, it was the primary factor why we 23 were unable -- alongside the very limited co-operation 24 that we received from the trustees and Watchtower as to 25 why it took the length of time that it did.</p> <p style="text-align: center;">Page 65</p>	<p>1 Essentially, we had to compile our findings 2 independently of any engagement, or significant 3 engagement, with either the trustees of Manchester 4 New Moston or the branch -- the central office, and the 5 only engagement that we received was at the end when we 6 submitted the draft inquiry report for comments on 7 factual accuracy.</p> <p>8 Q. Mr Gillies said that he has or had, and I believe he may 9 have attended some of the meetings with you, although, 10 obviously, there would have been other individuals as 11 well, a good working relationship with the 12 Charity Commission. Despite the litigation, there is 13 cordiality on a personal level?</p> <p>14 A. It's been variable. It's a characterisation -- I think, 15 overall, the characterisation or implication that 16 somehow The Watchtower charity and the Branch Committee 17 are fully co-operative with us is not a characterisation 18 I would recognise.</p> <p>19 Going back to the point about delays, I think we -- 20 there are times where it's fair to say that the increase 21 in our workloads and the tight resources that we have, 22 have, in the past, impacted on our ability to be able to 23 progress The Watchtower inquiry, but that is not 24 a relevant factor at the moment.</p> <p>25 Most recently, we wrote to Watchtower with concerns</p> <p style="text-align: center;">Page 66</p>
<p>1 about sufficiency of the policies and procedures that 2 the congregations are using, with the expert and third 3 party professional support. They responded with some 4 concerns to those comments.</p> <p>5 I rang one of the Branch Committee members up 6 in December, urging or requesting that we just simply 7 meet face to face to discuss those items. They declined 8 to do so, and, in response, we received pre-action 9 correspondence of further potential litigation.</p> <p>10 Q. What the Jehovah's Witnesses say is, they have 11 criticised your approach in respect of the New Moston 12 congregation on the basis that they say that the 13 trustees didn't have any involvement. This was the case 14 about, what was the level of involvement of the trustees 15 in a Judicial Committee where an individual who had been 16 the subject of abuse had to speak to her abuser and was 17 asked questions which you found were inappropriate, 18 shall we say, even in the context of a spiritual 19 exclusionary process. But what they say is that that's 20 factually incorrect, in that the trustees don't agree 21 that they had any involvement in the Judicial Committee, 22 and they say that in their witness statement to us. Do 23 you agree that you compiled this information in the 24 absence of the trustees, so you can't be entirely clear 25 that they did have any involvement in the</p> <p style="text-align: center;">Page 67</p>	<p>1 Judicial Committee, thus leading you to be able to 2 criticise them in the way that you did?</p> <p>3 A. We didn't criticise them for their handling of that 4 Judicial Committee. So they're two separate points 5 here.</p> <p>6 The inquiry was multifaceted in terms of 7 the elements it considered. Our direct criticisms of 8 the trustee were in terms of their handling of 9 the initial allegations. For example, how they -- their 10 decision not to even exercise a Judicial Committee 11 meeting in the first place when they were first aware of 12 the complaints, because that is the only mechanism by 13 which disciplinary measures can be exercised for the 14 charity.</p> <p>15 The second is in terms of their failure to supervise 16 the so-called restrictions that were put in place on 17 Mr Rose.</p> <p>18 The final point is that we -- and we clearly set 19 this out in the inquiry report and acknowledge that the 20 congregation elders did not take part in that 21 Judicial Committee hearing, and we have separately 22 criticised those participants.</p> <p>23 Q. Yes.</p> <p>24 A. But, nevertheless, it is a charity, and it is the 25 trustees that are legally responsible for the</p> <p style="text-align: center;">Page 68</p>

<p>1 disciplinary processes. It is one of the points: that 2 we are satisfied about the factual accuracy and our 3 regulatory findings that we made in that report. 4 Q. Thank you. The other point that the Jehovah's Witnesses 5 and Mr Gillies in his witness statement makes about your 6 second -- because, as I understand it, you have a second 7 investigation about Watchtower that is currently 8 ongoing, so there's a limited amount of information you 9 can tell us about that, is they're saying that you have 10 demanded information but then not replied for years, 11 thus stigmatising them and leaving them in perpetual 12 uncertainty. Do you agree with that characterisation? 13 A. In short, no. They're saying it is about the 14 congregations, but the purpose of opening the inquiry 15 into Watchtower was because, as a result of our earlier 16 engagement, we understood that Watchtower was the 17 charity that produced the child protection safeguarding 18 policy for adoption by the congregations, and rather 19 than us opening a class inquiry into 1,300 20 congregations, we sought to work directly at the centre. 21 So the obstruction or the delays are, in our view, 22 in a large part, due to the fact that Watchtower are not 23 fully and actively co-operating with the inquiry. There 24 is information we have requested that is outstanding. 25 MS SCOLDING: There were a couple of glitches on your feed</p> <p style="text-align: center;">Page 69</p>	<p>1 just then, Mr Grenville, but only very minor, so let's 2 hope that that doesn't continue. 3 I just have a few more questions for you. 4 I note the time, chair. Would you prefer that I ask 5 the questions now and went slightly over the hour, or 6 that Mr Grenville returned briefly and we have 7 a slightly earlier lunch break? Because I think I've 8 probably got about another 10 or 15 minutes with 9 Mr Grenville? 10 THE CHAIR: I think we should take a slightly earlier lunch 11 break and return after that. 12 MS SCOLDING: Thank you very much. Mr Grenville, again, the 13 same rule applies in respect of being on oath. 14 A. Okay. 15 THE CHAIR: We will return at 1.40 pm. 16 MS SCOLDING: Thank you very much, chair. 17 (12.40 pm) 18 (The short adjournment) 19 (1.40 pm) 20 MS SCOLDING: I pass back to Mr Grenville. We were just 21 finishing asking some questions about the 22 Jehovah's Witnesses. I am asked to ask you a couple of 23 questions on behalf of the Christian Congregation of 24 Jehovah's Witnesses. Mr Grenville, the first question 25 I have to ask you is, is it true that the Watchtower</p> <p style="text-align: center;">Page 70</p>
<p>1 Britain has, for a number of years, and particularly 2 since July 2019, requested disclosure of 3 the Charity Commission's file about the statutory 4 inquiry, and, in response, the Charity Commission has 5 refused to disclose such? Is that accurate? 6 A. They have asked us to make disclosures about our 7 investigation files, and we have explained to them that 8 those investigation files are confidential. 9 Q. Thank you. The next question I would like to ask you 10 is, would you agree -- I am asked to ask this on behalf 11 of the Christian Congregation of Jehovah's Witnesses -- 12 that over the six years of the statutory inquiry, 13 representatives of Watchtower Britain have met 14 repeatedly with each of the successive lead 15 investigators? And they then name at least six 16 different occasions between 2014 and 2018 when such 17 meetings have taken place. 18 A. They have met on occasions, but, as I outlined, for 19 example -- so this portrayal that they're actively 20 co-operating with us is not a full representation of 21 the picture. Like I said, it's been a very variable 22 engagement process with them. 23 I gave an example most recently of how we have 24 attempted to engage, and that I personally requested to 25 a member of the British Branch Committee that we meet in</p> <p style="text-align: center;">Page 71</p>	<p>1 person, and that they declined to do so. 2 Q. Thank you very much, Mr Grenville. I have a number of 3 potential recommendations I'd like to talk to you about. 4 Firstly, a while ago, you mentioned the fact that you 5 feel, or the Charity Commission considers, that there's 6 currently a gap in the law in respect of, I understand, 7 sections 76A and B of the Charities Act 2011. Can you 8 tell us what they say and why you think that causes 9 a gap and what it is you're going to do about that, or 10 potentially do about that? 11 A. Yes. This is part of our project to -- to do with the 12 sufficiency of our powers and it is one area we have 13 looked at. I think what we have highlighted is that, to 14 date, it has not necessarily been an obstacle in 15 exercising our powers, but section 76 specifies the 16 grounds under which we can exercise certain temporary or 17 protective interventionary powers in -- 18 Q. Would you like -- 19 A. (Overspeaking). 20 Q. Mr Grenville, would you find it helpful to have the 21 section up on the screen, because I can get it up on the 22 screen? 23 A. Yes, please. 24 Q. CYC000440_016. It is paragraphs 71 to 73 which are the 25 relevant paragraphs.</p> <p style="text-align: center;">Page 72</p>

<p>1 A. You can see that the origins of this power for the 2 Commission effectively relate to what they call 3 (Receiver and Manager) Regulations, which was largely to 4 do with the property of organisations. So in order for 5 us to exercise these temporary or protective powers, we 6 have to determine either that there's -- establish that 7 there's been misconduct or mismanagement in the 8 administration of the charity, or it's necessary to act 9 for the purposes of protecting property of the charity. 10 So in the instances that I described, for example, 11 about Ampleforth, we had to establish evidence of 12 mismanagement in order to appoint the interim manager. 13 In future, what we would like to do, in order to 14 ensure that there is no doubt about our ability to 15 appoint -- exercise such powers, we'd like to have an 16 additional limb, which is, where there's an identifiable 17 risk of harm. For example, that could be harm to 18 people. Then that would remove beyond doubt all the 19 need for us to establish mismanagement before we can 20 exercise the power. 21 Q. Is that something for which you have a legislative 22 timetable? It obviously would require an amendment to 23 the legislation? 24 A. Not at the moment. I think, as I might have -- 25 I hopefully expressed earlier, we are at an early stage</p> <p style="text-align: center;">Page 73</p>	<p>1 of our review of powers and there are a number of 2 different aspects that we are considering. This is one 3 component of that. 4 Q. Are there any other powers that you are considering 5 extending which will have an impact upon child 6 protection or safeguarding? 7 A. Some, I suppose, indirectly or directly. So, for 8 example, there are some specific ones where we are 9 looking at the breadth of our suspension orders against 10 individuals. At the moment, it applies specifically to 11 their role in a particular charity, whereas, if they're, 12 for example, a trustee of multiple charities, the order 13 wouldn't apply to the other charities. So, for example, 14 we'd be looking at the breadth and flexibility of our 15 suspension order in respect of trustees. 16 Q. So you can't do what you could do under directors' 17 disqualification, which is you can disqualify someone 18 from directorship kind of full stop, in a way? 19 A. So there are two different parts to that. We can 20 disqualify somebody to serve across all charities or 21 a particular type. This is specifically, for example, 22 in relation to suspension rather than disqualification. 23 Q. Rather than disqualification, I do apologise. 24 A. Another example area is, we touched on serious incident 25 reporting. At the moment, we are giving consideration</p> <p style="text-align: center;">Page 74</p>
<p>1 as to whether or not the statutory basis for that could 2 be strengthened. As we have outlined in our written 3 submissions to the inquiry, we are carefully considering 4 this because one of the concerns is what any kind of 5 uplift would be to the incident reports that we receive 6 and how we would resource and manage that. But that's 7 certainly another active area of consideration. 8 Q. I think what you have said is, you are considering 9 making it compulsory to report a serious incident rather 10 than something which is highly encouraged, but, if you 11 do so, you're worried that you will be overwhelmed, in 12 the context of the resources you currently have? 13 A. Well, I think we need to work that through, in terms of 14 trying to calculate what we think a likely projection or 15 uplift in incident reports would be in advance. 16 Obviously, there would have to be a lot of work done 17 around that to clarify further what the statutory 18 obligations relate to. As I said, it is at a very early 19 stage. For any of these items, including my reference 20 earlier to consideration of registration and winding-up 21 powers, a lot of this is highly considerative and will 22 require consultation, so it is difficult to project any 23 timetables or conclusions as to what we reach in these 24 areas. 25 Q. The other issue that I identify where you've identified</p> <p style="text-align: center;">Page 75</p>	<p>1 that you may consider that it would be useful would be 2 the introduction of some powers so that deliberate 3 concealment (interference) around safeguarding and child 4 protection, for them to be something against which you 5 could take compliance action or wider, they would be 6 a criminal offence generally, would be something that 7 you may be in favour of? 8 A. Yes. I think it's a question, then, of, for example, if 9 we were to place serious incident reporting on 10 a statutory footing, what would be the enforcement 11 powers behind non-compliance. As we talked about 12 earlier, there are certain individuals who may get it 13 wrong simply through lack of knowledge or judgment, and 14 then there's others who will deliberately attempt to 15 conceal, and it's that, you know, consideration of, how 16 do we enforce it against the deliberate non-compliers. 17 Q. In other words, you would be keen, if you were to extend 18 it to be mandatory, for there to be effective 19 enforcement of that where there had been concealment or 20 wilful non-compliance with the requirement to report? 21 A. Yes, absolutely. Because, otherwise, it wouldn't have 22 any teeth, would it? 23 Q. Well, no, but that doesn't mean that it doesn't get 24 done. Sometimes you have to take one step at a time. 25 A. Yes.</p> <p style="text-align: center;">Page 76</p>

<p>1 Q. You've made it clear to us that you don't consider that 2 you would be the right organisation to fulfil a role as 3 the regulator of child protection of charities. Can you 4 just explain to us why the Charity Commission has come 5 to that view, because a lot of organisations and 6 individuals have said to us, "Well, obviously, it would 7 be the Charity Commission, or the most obvious place 8 where any kind of registration system should sit", if 9 the inquiry were to determine one were necessary and 10 appropriate, "would be with the Charity Commission"?</p> <p>11 A. There are a few points to make on it. One is that, as 12 we have outlined, we have a very specific role which 13 brings a particular perspective. It's not exclusively 14 related to child protection. It's related to general 15 trustee duties.</p> <p>16 The other key point to make is that, as we talked 17 about standards, in terms of any child protection 18 arrangements or additional role that we have to perform, 19 we have to consider it in the wider context of 20 the charity sector, and other points to make are that 21 not all faith organisations are charities.</p> <p>22 Q. No.</p> <p>23 A. So our concern is that, if the objective is to improve 24 outcomes for children and make environments safer for 25 children, the framework should be linked to the activity</p> <p style="text-align: center;">Page 77</p>	<p>1 and the risk, not to the status of the organisation, and 2 then what we would do is, where it was relevant, if 3 there's an additional statutory framework -- say, for 4 example, as in education or care, we then overlay that 5 specific statutory requirement on top of the general 6 duty in considering whether or not trustees are properly 7 discharging their duties. We consider that would be 8 a more balanced way. Because I think there's -- I've 9 seen examples of it, that when we -- from our own 10 casework, when we go in to certain individuals, they 11 will seek to reconstruct themselves as a non-charitable 12 entity. Carry on what they're doing, but just do it 13 without -- outside of our scrutiny and, obviously, 14 specifically as a charity regulator, then it would fall 15 outwith our jurisdiction.</p> <p>16 The other point I would make is that there are other 17 organisations or agencies out there who are already 18 established in some shape or form to regulate children's 19 services, and surely the refinement of any regulatory 20 framework is easier to do with those organisations than 21 it is with us.</p> <p>22 Q. Do you have any views on -- the Department for Education 23 has proposed a voluntary Code of Practice. Now, it 24 hasn't been published in final form yet. I understand, 25 from what Ms Dixon from the Department for Education</p> <p style="text-align: center;">Page 78</p>
<p>1 told us yesterday, there will be some changes from the 2 draft, but possibly not a wholesale revision.</p> <p>3 Do you have any views about the usefulness of that 4 kind of code for charities that you deal with within the 5 sphere of religious settings?</p> <p>6 A. I think, as we outlined in the witness statement, we're 7 supportive of a voluntary code coming in, and then we'd 8 obviously have to see how -- its practical effects once 9 implemented.</p> <p>10 As we talked about earlier today, a number of 11 the performance issues that we have touched on are due 12 not to deliberate non-compliance, they're due to lack of 13 understanding or insufficient resources.</p> <p>14 So I think that voluntary codes and, as we talked 15 about earlier, awareness and training still has a part 16 to play in terms of bringing some parties along.</p> <p>17 Q. Do you think there should be registration and regulation 18 within this sector of organisations that carry out 19 activities with children, whether they're voluntary 20 organisations or not?</p> <p>21 A. Well, it's certainly an option to consider amongst, as 22 you know, a range of things that have been discussed 23 with the inquiry, as to how standards are improved. As 24 you have highlighted in your opening statements, one of 25 the particular difficulties of this subsector is its</p> <p style="text-align: center;">Page 79</p>	<p>1 fragmented nature and ability to identify relevant 2 organisations.</p> <p>3 Q. So a registration system would at least provide a way of 4 understanding what's out there? There may well always 5 be outliers, but it's likely to capture significantly 6 more?</p> <p>7 A. I think the question with some of these things, it will 8 be what turns on the definitions that you use about who 9 goes on the register and, as we talked about before, 10 there's a risk that if you create too narrow 11 a definition, there will be people that will argue that 12 they're not required to register.</p> <p>13 Q. What do you think this sector needs to do to make 14 children safer and what role do you think the 15 Charity Commission should play in enabling that to 16 happen?</p> <p>17 A. We have touched on it already, I think, in terms of 18 awareness, support for charities which we're undertaking 19 at the moment through the faith outreach team and trying 20 to work with other agencies, and I think the question 21 that remains is, what additional regulatory framework or 22 what requirements are needed in order to bring those 23 organisations in which there's a cultural resistance to 24 adoption of these standards.</p> <p>25 Q. What percentage -- I don't know whether or not you can</p> <p style="text-align: center;">Page 80</p>

<p>1 give me a percentage of what numbers or the sort of 2 numbers of those who show what you have called cultural 3 resistance. Is it a very small part of the sector or is 4 it a considerable number? 5 A. It's anecdotal, but my experience, based on co-operation 6 levels that we receive during our casework, is it's 7 a minority, and probably a small minority, of those 8 organisations; that the majority would probably 9 voluntarily improve with the appropriate support and 10 assistance. 11 Q. But of that minority, are you able to work with them in 12 the way that you would like to, on the basis of 13 the powers that you currently have? 14 A. Certainly in terms of pace, I don't think that we 15 necessarily are. As I described, we are looking at the 16 sufficiency of our powers for charities that we don't 17 believe meet the public expectations of how a charity 18 should behave. 19 Q. Do you think that the risk to children is so significant 20 in that small minority of challenges -- of charities 21 that it is proportionate to seek to increase the space 22 which is regulated, because, as we have already 23 identified, at the moment there really is no 24 registration or regulation. Do you think it is 25 proportionate to -- is it a sledgehammer to crack a nut</p> <p style="text-align: center;">Page 81</p>	<p>1 to think about using regulation or registration or some 2 form of external oversight in those sorts of cases? 3 A. I think it would be proportionate to consider some 4 aspects as strengthening the statutory frameworks. It 5 is difficult to be prescriptive, isn't it, without 6 seeing the details of what such regulation might look 7 like as to whether or not it's proportionate in the 8 circumstances. 9 As we talked about before, there are a number -- the 10 sector itself is comprised of a large number of very 11 small organisations which are volunteer led, so, you 12 know, I think the question of proportionality will turn 13 on the detail of any proposals. 14 MS SCOLDING: Thank you very much, Mr Grenville. I have no 15 further questions for you, but please wait there, the 16 chair and panel may have some. Thank you. 17 THE CHAIR: Thank you, Ms Scolding. I have no questions. 18 But I will ask my colleagues if they do. Ms Sharpling? 19 MS SHARPLING: No, thank you, chair. 20 THE CHAIR: Mr Frank? 21 MR FRANK: No, thank you. 22 THE CHAIR: Sir Malcolm? 23 PROF SIR MALCOLM EVANS: No, thank you, chair. 24 THE CHAIR: Thank you, Mr Grenville. We have no further 25 questions for you.</p> <p style="text-align: center;">Page 82</p>
<p>1 A. Thank you. 2 MS SCOLDING: Thank you very much, Mr Grenville. 3 (The witness withdrew) 4 MS SCOLDING: I now, chair, pass over to Mr Tahzib, who has 5 a small amount of adducing of evidence to take place 6 prior to the commencement of closing submissions. Thank 7 you. 8 Witness statements adduced 9 MR TAHZIB: Thank you. Chair, we seek your permission to 10 adduce a series of statements relating to the Christian 11 Congregation of the Jehovah's Witnesses, including 12 statements from elders and from parents, concerning the 13 handling of child sexual abuse within the congregation. 14 With your permission, chair, I will just run through 15 what those statements are. 16 There is a statement from PRH6 for which the 17 reference is CJW000107. 18 There is a statement from PR-H7, for which the 19 reference is CJW000108. 20 There is a statement from PR-H9, with the reference 21 CJW000109. 22 There is a statement from PR-H10 and PR-H11, with 23 the reference CJW000110. 24 There is a statement from PR-H12, with the reference 25 CJW000111.</p> <p style="text-align: center;">Page 83</p>	<p>1 There is a statement from PR-H13, with the reference 2 CJW000112. 3 Then there are three statements from elders: the 4 first is from Francis Kakokota, with reference 5 CJW000117; a statement from Philip Snelman, with 6 reference CJW000121; and a statement from Daniel Butler 7 with reference CJW000119. 8 Chair, we also seek your permission to adduce 9 statements from PR-X1 and PR-X2, who are former members 10 of the congregation, as well as PR-X3, who remains 11 a member. All three of these individuals describe their 12 experiences within the congregation and, in particular, 13 in relation to the practices and policies regarding the 14 handling of child sexual abuse. 15 The references for those statements, chair, 16 are: PR-X1 is PRX000008; for the statement of PR-X2, 17 it's PRX000027; and, in the case of the statement of 18 PR-X3, it's PRX000030. 19 Thank you, chair. 20 THE CHAIR: Thank you, Mr Tahzib. We will now proceed to 21 hear closing statements by those core participants who 22 have indicated they wish to make such a statement. Each 23 core participant team has been given five minutes, 24 except for Mr Scorer, who has been given 15 minutes. We 25 will begin with Mr Scorer.</p> <p style="text-align: center;">Page 84</p>

<p>1 Closing statement by MR SCORER 2 MR SCORER: Good afternoon, chair and panel. To confirm for 3 those watching, I represent Migdal Emunah, 4 Southall Black Sisters, Sadia Hameed, Lloyd Evans, 5 Dr Lisa Oakley, Yasmin Rehman and the 6 Interfaith Alliance. 7 Chair, as we noted at the outset, this investigation 8 is one of the first to be undertaken worldwide into 9 child sexual abuse in minority religious settings. You 10 have started, therefore, a long overdue process of 11 scrutiny. But for reasons that were all too apparent 12 during the hearings, your investigation can only be 13 a beginning. 14 You have lifted the lid and started to examine the 15 reality of child sexual abuse in these settings, but in 16 so doing, you have merely confirmed the extent of work 17 still to be done and the legal and structural overhaul 18 now required. 19 I start with the evidence on Jewish communities. 20 You heard from Yehudis Goldsobel of Migdal Emunah. She 21 made many powerful points. She told you about the 22 central role of rabbis in Orthodox and ultra-Orthodox 23 communities. Whatever their formal religious 24 jurisdiction, the reality is that rabbis are involved in 25 all aspects of the life of their communities, including</p> <p style="text-align: center;">Page 85</p>	<p>1 response to child abuse. Indeed, this was confirmed by 2 Rabbi Baumgarten, although, of course, he tried to make 3 a convenient exception for the rabbi in the "Dispatches" 4 programme. 5 The reality is that rabbis are never off duty, but 6 therein lies the problem. Rabbis are experts in 7 religion. They are not experts in safeguarding. 8 As Ms Goldsobel explained, their aim is to protect 9 the face of the community as a collective whole, not to 10 protect the individual who might have been abused. The 11 rabbi's focus is the community and its reputation, not 12 the needs of the victim. 13 As we have seen throughout this hearing, what 14 religious organisations, both Jewish and others, often 15 fail to understand is that dealing with child abuse is 16 a special skill. It is not simply another aspect of 17 the pastoral role of a rabbi, imam or a priest and it 18 requires an overriding focus on the child, not on the 19 reputation of the synagogue, the mosque or the wider 20 community. 21 It also requires specialist training and experience. 22 As Rabbi Baumgarten confirmed, none of the UOHC 23 rabbis are even DBS checked, let alone trained in 24 safeguarding. 25 Yet so much of the day-to-day life in Jewish</p> <p style="text-align: center;">Page 86</p>
<p>1 communities, particularly Orthodox and ultra-Orthodox 2 communities, focuses on the role of the rabbi in dealing 3 with these issues. 4 Disappointingly in this hearing, we didn't get an 5 opportunity to hear from Shema Koli. By claiming that 6 Mr Rabson is no longer active, despite evidence 7 suggesting otherwise, they managed to evade scrutiny. 8 However, the central role of rabbis in Jewish society is 9 very evident if you look at their website, which shows 10 that they seek rabbinical approval for their activities 11 at every turn. This is the cultural reality you have to 12 deal with and any recommendations you make have to have 13 it well in mind. You also have to have well in mind 14 what was very apparent from Rabbi Baumgarten's evidence. 15 In ultra-Orthodox communities, which are by far the 16 fastest-growing Jewish communities in the UK, with half 17 the community under the age of 18, the very fact of 18 child abuse itself is constantly minimised and denied by 19 religious leaders. 20 Ms Goldsobel raised another important issue: 21 disguised compliance. This is where organisations and 22 settings seek to give the impression of effective 23 safeguarding because they know that wider society and 24 inquiries like yours demand it, but the reality on the 25 ground is one of half-hearted or non-existent</p> <p style="text-align: center;">Page 87</p>	<p>1 implementation. Of course, this is not only an issue in 2 Jewish settings, and I remind you of 3 Mrs Justice Lieven's devastating comment about child 4 protection policies in the Jehovah's Witnesses being 5 drawn up for public consumption but not followed. 6 As far as Jewish settings are concerned, in our 7 written submissions we will set out in detail our 8 concerns about the training from Reshet and Interlink 9 and the implications for the quality of training in 10 Jewish communities at the current time. 11 A similar picture emerges in South-Asian 12 communities. When you heard from Pragna Patel, 13 Sadia Hameed and Natasha Rattu, you rightly observed 14 that they painted a rather bleak picture. That is 15 because, sadly, the reality is quite bleak, and this is 16 the reality they deal with every day. Their analysis of 17 power, silence and denial within South-Asian communities 18 was confirmed -- perhaps unintentionally -- by other 19 witnesses you heard from in this sector. The Mosques 20 and Imams National Advisory Board, MINAB, have set 21 themselves up as an improvement body to make mosques 22 better. But over the past two decades they have 23 completely failed to perform any meaningful regulatory 24 or other improvement function at all in relation to 25 child abuse.</p> <p style="text-align: center;">Page 88</p>

<p>1 Their attitude is that there is nothing to see here. 2 They tried to wriggle out of questioning on this by 3 saying that they are led by what they get reports on. 4 Nobody reported a problem to them, so they didn't do 5 anything. 6 But, actually, it was clear that MINAB simply do not 7 see child sexual abuse as an issue within the Muslim 8 community at all. And, chair, it may be that if you 9 went back 20 years, that level of ignorance could be, to 10 some extent, excused. 11 However, since 2011, child sexual abuse has been in 12 the news almost constantly. This is why we have this 13 inquiry. This national conversation has included issues 14 around child sexual abuse associated with parts of 15 the Muslim community, grooming gangs, for example, and 16 you heard yesterday the very impressive evidence from 17 the Muslim Women's Network and, as they said, they did 18 a report in 2013 on these very issues. 19 So the idea that this is not an issue within Muslim 20 communities is absurd and dangerous. But this is the 21 attitude you have to deal with from the main regulatory 22 body for mosques. 23 What was very apparent from the MINAB evidence was 24 not only their lack of understanding of child sexual 25 abuse, but, frankly, their lack of understanding of</p> <p style="text-align: center;">Page 89</p>	<p>1 their own ignorance. Mr Azmi said that Islam sees 2 sexual abuse as one of the worst types of sin, that 3 Muslims understand this and so, basically, this is the 4 end of the matter. 5 He refused to accept expert training from secular 6 organisations. He claimed it wouldn't be culturally 7 appropriate. So he wants to say that Muslim 8 organisations have a good understanding of sexual abuse 9 but at the same time that the training offered by 10 secular bodies is not culturally appropriate because it 11 involves explicit discussion of the things that he 12 claims are already well understood. 13 He wants to have it both ways. 14 As the evidence shows, this is also true of Hindu 15 and Sikh religious bodies. We heard, for example, about 16 the safeguarding failings at the largest Hindu temple in 17 Leicester and how the Sikh gurdwara in Southall refused 18 to refer vulnerable women and children to local women's 19 groups. This is the level of denial and complicity 20 confronting advocates like Pragna Patel and Sadia Hameed 21 in their everyday work. 22 I turn to the Jehovah's Witnesses. As we will set 23 out in our written submissions, we feel that much of 24 the evidence from Mr Gillies was evasive and misleading. 25 In the face of overwhelming evidence to the contrary, he</p> <p style="text-align: center;">Page 90</p>
<p>1 tried to tell you that the Jehovah's Witnesses don't 2 have any arrangements or activities which separate 3 children from their parents, whether in field service or 4 Bible study or elsewhere. He used this obvious untruth 5 to justify rejecting any secular advice on safeguarding. 6 He claimed that no witness had ever been required to 7 appear before their abuser in a Judicial Committee, 8 whilst knowing perfectly well that a recommendation from 9 a religious authority figure always carries a degree of 10 compulsion, particularly in a religion which ostracises 11 those who fail to comply with its practices and beliefs. 12 His attitude to external reporting was very striking. 13 On everything else, including whether to report damage 14 to a Kingdom Hall, his organisation is very directive. 15 But on this issue, his view was that each shall carry 16 his own load. 17 It was notable just how many pretexts the 18 Jehovah's Witnesses will find not to report abuse or to 19 disclose documents, and we heard more about that 20 obstructionism this morning. 21 The only reasonable conclusion from this litany of 22 excuses is that they simply do not want to report. 23 Mr Gillies was also very discomfited quite clearly by 24 Mr Frank's questions about document destruction. Chair, 25 given that so much of Mr Gillies' evidence was so</p> <p style="text-align: center;">Page 91</p>	<p>1 obviously disingenuous and unreliable, we take this 2 final opportunity to urge you to use your powers to 3 compel full disclosure of their records and data in 4 regard to abuse allegations rather than the selective 5 data disclosed thus far. 6 Child sexual abuse is abuse, whether it is 7 perpetrated by an elder or an ordinary member of 8 the congregation, whether in a Kingdom Hall or in 9 a home. By permitting CCJW to present their data so 10 selectively, we are concerned that hundreds, if not 11 thousands, of abuse cases were effectively excluded from 12 consideration. The many victims whose abuse is 13 currently confined to Watchtower's records, especially 14 those whose abuse is yet to be reported, remain 15 completely silenced. Chair, if you fail to seek 16 disclosure of the full data, you unwittingly make things 17 worse for survivors than if you had sought no data at 18 all. 19 Cherry-picked figures -- which the 20 Jehovah's Witnesses repeatedly, and wrongly, 21 characterised as the full figures during this hearing -- 22 will, we fear, in future be touted by them as the actual 23 figures and they will try to say that they have your 24 stamp of approval. 25 Indeed, chair, the same point applies to data from</p> <p style="text-align: center;">Page 92</p>

<p>1 other religious organisations: if you don't require full 2 disclosure, some of them will say that you approved the 3 data they provided, and your lack of challenge will be 4 presented as validation.</p> <p>5 In highlighting these issues in religious 6 organisations, we do not seek to deny improvement and 7 good practice where it occurs. On the contrary, given 8 the right regulatory structure, good practice can be 9 a role model for others. We commend the evidence from 10 the Baptist Union and their efforts to improve 11 safeguarding practice but also to develop the right 12 culture to underpin it, and this is consistent with the 13 experience of Dr Lisa Oakley, who identifies the 14 Baptist Union as one of the organisations which set out 15 to develop and promote a healthy culture.</p> <p>16 Similarly, in her work with the United Reform 17 Church, Dr Oakley found that her recommendations were 18 acted upon quickly and transparently.</p> <p>19 These positive examples should be recognised, as 20 should other recent changes. For example, we welcome 21 the recent public announcement from Manchester Beth Din 22 that it is halakhically permitted for victims to report 23 their abuse to the police and that it encourages them to 24 do so.</p> <p>25 However, it is important to see recent improvement</p> <p style="text-align: center;">Page 93</p>	<p>1 in context. It has mostly occurred because of pressure 2 from this inquiry and campaigning groups. The 3 Manchester Beth Din letter came about because of years 4 of tireless campaigning from Migdal Emunah. These 5 improvements cannot detract from the overall reality 6 seen in these hearings. Religious settings are woefully 7 underregulated. As, indeed, Ms Scolding QC observed, 8 many religious settings are less regulated than donkey 9 sanctuaries. Self-regulation has very largely failed. 10 So the overall picture is troubling, very troubling, and 11 we have the constant risk of what Ms Goldsobel aptly 12 called "disguised compliance".</p> <p>13 It is clear, therefore, that in order to properly 14 protect children in religious settings we need a new 15 approach. We clearly need registration of religious 16 activities and personnel, not to interfere with the free 17 practice of religion, but because, without it, 18 meaningful regulation of any kind is clearly impossible.</p> <p>19 We need to widen the definition of regulated 20 activities. We also emphatically need mandatory 21 reporting. If the case for mandatory reporting still 22 needed to be made, it was made in spades by the evidence 23 you heard about the Jehovah's Witnesses and from 24 Rabbi Baumgarten. As was clear this morning, without 25 mandatory reporting, other regulatory powers and actions</p> <p style="text-align: center;">Page 94</p>
<p>1 are effectively neutered or undermined. But in relation 2 to mandatory reporting, I would also like to emphasise 3 this point: mandatory reporting is sometimes portrayed 4 as a stick which the law uses to enforce compliance. 5 But we should view it in a much more positive light, 6 which is that a mandatory reporting law provides 7 a refuge for those within regulated activities who often 8 face fierce pressures not to report -- pressures of 9 loyalty to colleagues, to community and to the 10 institution.</p> <p>11 Mandatory reporting gives people the ability to say, 12 "I have to do this", and in that way it enables them to 13 escape the pressures against reporting that we have seen 14 so many times in this inquiry.</p> <p>15 Chair, we also need an entirely new model of 16 independent oversight of safeguarding in these 17 organisations and settings. The current situation 18 exposed in these hearings is a collective failure not 19 just of religious organisations themselves, but of all 20 the agencies charged with child safeguarding and, 21 indeed, the law itself.</p> <p>22 So we need a new system.</p> <p>23 As I have said before, we are not suggesting that an 24 external body should do the safeguarding in these 25 settings. Safeguarding has to be done and it has to be</p> <p style="text-align: center;">Page 95</p>	<p>1 owned by the organisations themselves. But monitoring 2 the effectiveness of safeguarding, ensuring that it 3 meets the necessary standards and dealing with 4 complaints, for that we need an independent oversight 5 body.</p> <p>6 I finish just by making two points on that. 7 Firstly, current bodies simply do not have the 8 resources, knowledge or legal tools to do the job 9 properly. That is clear.</p> <p>10 By its own admission, as we heard a few moments ago, 11 the Charities Commission cannot do it. A stronger case 12 might be made for local authorities to do it. But the 13 danger there, the real danger, is then a balkanised 14 system where national standards lose out to a localised 15 postcode lottery. So we need a new national body.</p> <p>16 Furthermore, a key issue for our clients is to 17 ensure that any such body is not captured by the very 18 interests which it seeks to regulate, but is instead 19 driven by child protection and human rights, values and 20 principles. For that reason, it is imperative that 21 victims and survivors and those who advocate for them 22 are fully involved in the work of any new body.</p> <p>23 The meaningful involvement of victims and survivors 24 in a new regulatory system is the best guarantee that 25 the failings seen in these hearings are avoided in the</p> <p style="text-align: center;">Page 96</p>

<p>1 future.</p> <p>2 Chair, those are our submissions. Thank you.</p> <p>3 THE CHAIR: Thank you, Mr Scorer. Mr Collins?</p> <p>4 Closing statement by MR COLLINS</p> <p>5 MR COLLINS: Thank you, chair. Good afternoon, chair. Good</p> <p>6 afternoon, panel.</p> <p>7 I speak on behalf of Ex-JW Advocates Opposing Crimes</p> <p>8 Against Children. Their submission is this: Ex-JW</p> <p>9 Advocates Opposing Crimes Against Children was formed to</p> <p>10 shine a spotlight on the crime of child sexual abuse in</p> <p>11 the context of the Jehovah's Witnesses. The group feels</p> <p>12 that the hearings on Monday and Tuesday this week helped</p> <p>13 it to achieve this, and so, all in, the group are</p> <p>14 grateful to the inquiry for providing them with a voice.</p> <p>15 The hearings concerning the Jehovah's Witnesses</p> <p>16 fully demonstrated why a mandatory reporting law for</p> <p>17 England and Wales is vital and why a new external</p> <p>18 regulatory body should be formed with the power to</p> <p>19 ensure organisations meet best practices with regard to</p> <p>20 child-centred safeguarding. There is, the group feels,</p> <p>21 an intransigence on the part of the Jehovah's Witnesses</p> <p>22 organisation, a failure to embrace its institutional</p> <p>23 responsibilities, its duty of care, its duty to protect</p> <p>24 children, both its own and those outside its religion.</p> <p>25 During the hearings, counsel to the investigation</p> <p style="text-align: center;">Page 97</p>	<p>1 repeatedly put forward meaningful suggestions of where</p> <p>2 the Jehovah's Witnesses could improve in child</p> <p>3 protection. Not once did Paul Gillies of</p> <p>4 the Jehovah's Witnesses take her suggestions seriously,</p> <p>5 "We might consider [such and such] on a case-by-case</p> <p>6 basis" being the pinnacle of his enthusiasm. The group</p> <p>7 notes, too, a rigid mind-set in respect of apologising</p> <p>8 for child sexual abuse. Mr Gillies was asked if his</p> <p>9 religion's policies made provision to apologise for</p> <p>10 child sexual abuse where there is institutional fault.</p> <p>11 His answer was, "No".</p> <p>12 The group asks, how can any organisation move</p> <p>13 forward willingly in child-focused safeguarding if it</p> <p>14 cannot conceive of the need to apologise for its</p> <p>15 failings?</p> <p>16 In view of the foregoing, therefore, Ex-JW Advocates</p> <p>17 Opposing Crimes Against Children makes the following</p> <p>18 recommendations to this inquiry.</p> <p>19 First of all, mandatory reporting. There should be</p> <p>20 a mandatory reporting law that requires all allegations</p> <p>21 of child sexual abuse to be reported by religious and</p> <p>22 nonreligious institutions, to the police or a child</p> <p>23 protection body. The legal obligation should extend to</p> <p>24 all those with any position of trust without exception.</p> <p>25 Moreover, the persons in religious ministry should</p> <p style="text-align: center;">Page 98</p>
<p>1 not be exempted from reporting their knowledge or</p> <p>2 suspicions formed in whole or in part from information</p> <p>3 disclosed in, or in connection with, both religious</p> <p>4 confession and so-called confidential contexts. It</p> <p>5 should be a criminal offence not to report.</p> <p>6 It is important that both religious bodies and the</p> <p>7 individuals within them who hold positions of trust</p> <p>8 understand the need to report allegations. Mandatory</p> <p>9 reporting places the onus on the individual to report to</p> <p>10 the police. However, the religious organisation or</p> <p>11 institution must also have a legal and moral duty to</p> <p>12 report. It should report to an external regulator and</p> <p>13 that mechanism should form an integral part of its child</p> <p>14 protection policy.</p> <p>15 There should be sanctions, whether criminal or</p> <p>16 civil, for failing to do this.</p> <p>17 There should be an external regulator. There should</p> <p>18 be a national regulator for child protection. It would</p> <p>19 be an independent body with oversight of institutions'</p> <p>20 policies, procedures and practices relating to child</p> <p>21 protection. The role of the regulator would be (a) to</p> <p>22 ensure institutions' policies and procedures are</p> <p>23 child-focused and fit for purpose; (b) to educate and</p> <p>24 support institutions in forming and implementing</p> <p>25 fit-for-purpose child protection policies and practices;</p> <p style="text-align: center;">Page 99</p>	<p>1 (c) to investigate institutional failings in child</p> <p>2 protection; (d) to impose meaningful sanctions on</p> <p>3 institutions where non-compliance arises or adequate</p> <p>4 standards of child protection are not met.</p> <p>5 It is the opinion of this group that these</p> <p>6 recommendations would, if implemented, not curtail</p> <p>7 religious freedom, since this is not about infringing on</p> <p>8 personal belief, nor is it asking any religion, such as</p> <p>9 the Jehovah's Witnesses, to change its belief system.</p> <p>10 What we are proposing, with regard to any remedial</p> <p>11 action that needs to be taken against a religious</p> <p>12 organisation, amounts to no more than the state</p> <p>13 intervening in religious procedures and practices where</p> <p>14 it can clearly be demonstrated that the protection of</p> <p>15 children has been compromised. Children's right to be</p> <p>16 free from child sexual abuse is paramount here. It</p> <p>17 supersedes the rights of any religion to impose</p> <p>18 outdated, outmoded and ineffective methods of child</p> <p>19 protection.</p> <p>20 Thank you very much, chair, thank you, panel, and we</p> <p>21 welcome the opportunity to present a written submission</p> <p>22 over the coming weeks, thank you.</p> <p>23 THE CHAIR: Thank you, Mr Collins. Mr Cervenka?</p> <p>24 Closing statement by MR CERVENKA</p> <p>25 MR CERVENKA: Good afternoon, chair and panel. As you know,</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 I appear on behalf of Kol v'Oz and its chief executive 2 officer, Mr Manny Waks, a core participant in this 3 inquiry, alongside my colleagues Dr Ann Olivarius and 4 Ms Shannon Moore. We would first like to thank you, 5 Ms Fiona Scolding QC, the inquiry's legal team, as well 6 as its administrative and technical staff, for 7 continuing to hold hearings in these unprecedented times 8 to a standard of professionalism that will no doubt 9 serve as a benchmark for similar proceedings in the 10 future.</p> <p>11 In our opening statement, we asked the panel to look 12 beyond the published policies, DBS checks and 13 appointments of safeguarding officers, and examine the 14 reality that victims of child sexual abuse face in the 15 religious Jewish community. We consider this to be even 16 more important now that the hearings have concluded.</p> <p>17 There was a shared refrain in many of the Jewish 18 organisations' evidence. You heard that the landscape 19 for talking about child sexual abuse was changing, that 20 they were aware of the problem in general but felt 21 largely immune to it and that, in any event, they were 22 promoting safeguarding to the extent the law required.</p> <p>23 One was almost led to believe, when listening to 24 Rabbi Baumgarten's evidence, that the status quo ought 25 not to change, that children are full of life and full</p> <p style="text-align: center;">Page 101</p>	<p>1 of happiness, and the rabbis wise and trustworthy and, 2 where proper safeguarding policies were missing, rabbis 3 inherently, uniformly and organically advise victims of 4 child sexual abuse, even though they receive little to 5 no such training.</p> <p>6 The local authorities and Victim Support charities 7 painted a vastly different and, in our view, more 8 credible scene. The true influence and control that 9 ultra-Orthodox Jewish organisations and rabbis have over 10 their congregations is vast. In a world where textbook 11 pages are stuck together to hide references to sexual 12 education, or even basic human biology, children neither 13 gain meaningful understanding of what child sexual abuse 14 is, nor learn the language necessary to articulate and 15 disclose abuse.</p> <p>16 Putting up posters in schools and yeshivas is little 17 more than a hollow nod towards safeguarding. This, 18 coupled with a severe lack of dependable data relating 19 to child sexual abuse within religious Jewish 20 communities frames the unacceptable disconnect between 21 them and secular authorities.</p> <p>22 Until rabbis actively engage with safeguarding, 23 child sexual abuse in their communities will flourish. 24 The game of Whack-a-Mole that Mr Gamble is forced to 25 play when trying to engage with yeshivas in Hackney must</p> <p style="text-align: center;">Page 102</p>
<p>1 stop.</p> <p>2 Some of the Jewish organisations that participated 3 in this inquiry have called it a wake-up call and gave 4 assurances that they would now improve, but without 5 strong recommendations from this inquiry demanding they 6 take concrete action within clear time lines, the 7 momentum will dissipate quickly.</p> <p>8 Notwithstanding Rabbi Baumgarten's assertion that 9 mesirah does not apply where the person being reported 10 is causing harm to others, such as in the case of child 11 sexual abuse, you heard from victim advocates that this 12 view is not maintained consistently in Orthodox Jewish 13 communities.</p> <p>14 Even the Federation of Synagogues' statement 15 admitted that the hesitancy to report fellow Jews to the 16 authorities by some in Orthodox Jewish communities is 17 slowly evaporating, but we are not yet where we should 18 be. As a result, victims of child sexual abuse and 19 their families continue being shunned and ostracised by 20 their communities, whilst their abusers operate 21 unrestricted. This cycle must finally be broken.</p> <p>22 Kol v'Oz has offered detailed recommendations on how 23 that could be achieved in Mr Waks's witness statement. 24 The ultra-Orthodox leadership cannot be trusted when it 25 comes to addressing the issue of child sexual abuse</p> <p style="text-align: center;">Page 103</p>	<p>1 within their community. External intervention and 2 regulation must be the foundation of this inquiry's 3 response for meaningful cultural change to occur.</p> <p>4 Earlier today, Chief Rabbi Mirvis publicly wrote on 5 Facebook about religious communities unwittingly 6 providing a space in which children may come to harm. 7 Mr Waks strongly rejects that language in light of 8 the evidence that the inquiry has heard of intentional, 9 not unwitting, conduct and misconduct by some Jewish 10 institutions and their leaders.</p> <p>11 Chief Rabbi Mirvis's statement shows just how much 12 more cultural change still needs to happen in the Jewish 13 religious community to improve accountability and 14 safeguarding of children.</p> <p>15 We therefore ask the inquiry to conclude that a new 16 regulatory body be established and run by the government 17 to put strong child protection policies in place and 18 establish robust standards for processing of child 19 sexual abuse complaints.</p> <p>20 This should come hand in hand with a change in the 21 law relating to positions of trust so that it places 22 faith leaders of any faith on the same level as 23 teachers, and makes it a criminal offence for them to 24 have relationships with those between 16 and 18 years of 25 age.</p> <p style="text-align: center;">Page 104</p>

<p>1 Unless and until these changes are put into place, 2 Jewish children and children in other faiths will remain 3 at risk. That is too high a price to pay. Thank you. 4 THE CHAIR: Thank you, Mr Cervenka. Mr Brady? 5 Closing statement by MR BRADY 6 MR BRADY: Chair, panel, well-informed recommendations 7 depend on reliable facts. Of course, facts are not 8 supposition, they're not innuendo, they're certainly not 9 stereotypes. In this, I would like to just pause. It 10 is submitted that Mr Scorer's comments about destruction 11 of child sexual abuse records is patently false. 12 Facts, of course, have to correspond to the scope of 13 this investigation, which counsel to the inquiry has 14 said in her opening submissions is to examine how 15 religious organisations in England and Wales in 2020 16 respond to the need to keep children safe. 17 Chair, with that in mind, I would like to address 18 the facts as they relate to two key questions concerning 19 the child protection policy of Jehovah's Witnesses. The 20 first question: does that policy, in 2020, respond to 21 the need to keep children safe and to act appropriately 22 to allegations of child sexual abuse? CCJW submits that 23 the answer is yes. Mr Gillies explained that the child 24 protection policy of Jehovah's Witnesses was 25 substantially revised in the middle of 2018 through to</p> <p style="text-align: center;">Page 105</p>	<p>1 the early part of 2019, and now comprises four core 2 documents. 3 What are the facts before you about the 2018/2019 4 child protection policy? Throughout the two days of 5 this hearing that were devoted to Jehovah's Witnesses, 6 the counsel to the inquiry presented a total of seven 7 cases. But what are the facts about those cases? 8 Three of those cases were about how elders are said 9 to have responded to allegations 30 or more years ago. 10 That's the case of PR-A39, PR-A5 and PR-A40. Two other 11 cases are about how elders are said to have responded to 12 allegations in 2008 and 2012, that's found at tabs 29 13 and 53 of the evidence bundle. That leaves two 14 remaining cases: the Lancashire judgment and the case of 15 PR-A42, and the latter was first brought to the 16 attention of the elders in 2019. 17 If I could underscore, the facts of the Lancashire 18 case occurred before the current policy was adopted. So 19 that leaves the case of PR-A42. CCJW submits that that 20 case demonstrates that the policy, the current policy, 21 of Jehovah's Witnesses was carefully followed. All the 22 issue in that case involved the timing of the elders' 23 disclosure of a confession to the police. You might 24 recall that the evidence demonstrated or showed that 25 there was a seven-month delay in obtaining a production</p> <p style="text-align: center;">Page 106</p>
<p>1 order because of the police officer. That delay wasn't 2 attributable to the elders at all. I encourage you, 3 chair, to look at the statement of Mr Rudi Dobson. 4 CCJW presented to the inquiry 13 witness 5 statements -- from victims, parents and elders. Now, 6 five of those statements relate to how elders respond to 7 allegations in 2014 to 2017, just before the current 8 policy came into force. Five statements relate to 2019, 9 after that policy came into force, and three are from 10 2020, just a few months ago. 11 Counsel to the inquiry did not refer to any of those 12 13 witness statements, although in CCJW's submissions, 13 they are the only evidence before you that provides the 14 facts about the current policy of Jehovah's Witnesses, 15 what this inquiry is examining, or looking at. 16 So, chair and panel, I encourage you to carefully 17 consider those 13 witness statements when reaching your 18 factual conclusions about the current child safeguarding 19 policy of Jehovah's Witnesses. CCJW submits that those 20 witness statements confirm that the policy is working. 21 Allegations where a child might be at risk of abuse are 22 being reported by the elders to the police. Victims are 23 being supported by the elders and parents are being 24 warned by elders. 25 That brings me briefly to the second question: what</p> <p style="text-align: center;">Page 107</p>	<p>1 does the child protection policy of 2 Jehovah's Witnesses -- or why does it, rather, not 3 require that all allegations, including non-recent 4 allegations, be reported to the statutory authorities? 5 Well, the simple answer is this: in the absence of 6 a mandatory reporting law in England and Wales, the 7 Britain branch office had three choices: number one, do 8 nothing; number two, report every allegation to the 9 police, including non-recent allegations; or, number 10 three, report allegations where it appears that a child 11 might be in danger of abuse. In the absence of 12 a mandatory reporting law, the branch office of 13 Jehovah's Witnesses have chosen number three. 14 In jurisdictions that have adopted a mandatory 15 reporting law, some of those jurisdictions, if not many, 16 require two things: first, they require that individuals 17 with the knowledge of the allegation, the individual, is 18 the one who should make the report. Of course that 19 individual is free to seek legal or other advice, for 20 example, from a supervisor, union or professional body. 21 Secondly, those jurisdictions require that the duty to 22 report is limited to allegations where an identified 23 child might be at risk of abuse. There is no special 24 training required to make that assessment. 25 An example of that type of mandatory reporting law</p> <p style="text-align: center;">Page 108</p>

<p>1 is the Canadian Province of Ontario, where the test that 2 the Britain branch office uses to describe what 3 allegations to report, as set out at paragraph 8 of 4 the branch office service desk guidelines, is 5 essentially the same. The facts, based on evidence, and 6 not based on speculation, show that the current child 7 protection policy of Jehovah's Witnesses, as applied 8 now, is safeguarding children appropriately.</p> <p>9 But, chair, may I assure you that 10 Jehovah's Witnesses keep the child protection policy 11 under review and they will carefully consider any and 12 all recommendations that this inquiry makes. Thank you.</p> <p>13 THE CHAIR: Thank you, Mr Brady. Mr Payne? 14 MR PAYNE: My apologies, I'm having slight technical 15 difficulties with my computer. Can you hear me? 16 THE CHAIR: Yes. If you could try to speak up a bit, 17 please. Thank you.</p> <p>18 Closing statement by MR PAYNE 19 MR PAYNE: Of course.</p> <p>20 Over three weeks, the inquiry has heard evidence 21 from a range of religious organisations. The inquiry 22 has also heard first hand from some of those who, when 23 they were at their most vulnerable, were subjected to 24 abuse, and who have gone on to set up organisations 25 dedicated to assisting victims of abuse.</p> <p style="text-align: center;">Page 109</p>	<p>1 Their evidence has served to illustrate in stark 2 terms the overriding need to protect children from the 3 conduct of predatory adults. It has, however, also 4 served to emphasise the importance of organisations 5 working together constructively to further the common 6 objective of protecting children.</p> <p>7 In this regard, the ability of victim-focused 8 organisations to put aside their understandable 9 suspicion of religious communities and to adopt an 10 approach based on positive engagement and dialogue as 11 opposed to criticism and conflict is key, for it is in 12 this way that their valuable input will be best accepted 13 and absorbed by others seeking to safeguard and protect 14 children.</p> <p>15 The Chief Rabbi and the United Synagogue both wish 16 to express their deepest sympathy to all victims of 17 abuse, whatever their faith. It is hoped that the 18 inquiry, by exploring and exposing the actions of some 19 of those abusers and the failures in the systems that 20 should have protected them better has provided some 21 measure of comfort to those who were abused.</p> <p>22 The inquiry was set up to identify ways of improving 23 the safeguarding systems that protect our children today 24 and in the future. As its terms of reference make 25 clear, the focus of the inquiry is very much on</p> <p style="text-align: center;">Page 110</p>
<p>1 identifying failures in the manner in which institutions 2 responded to situations where children had been harmed. 3 But, of course, identifying failures is only one way of 4 understanding where improvements need to be made.</p> <p>5 Another factor, and the United Synagogue would say 6 an equally relevant consideration, lies in recognising 7 positive steps that have been, or are being, taken to 8 improve the protection provided for children, for it is 9 this type of information that balances out the 10 (inaudible) and shows that where dangers faced by 11 children are properly understood, they can be confident 12 of receiving a compassionate and caring support and to 13 thus encourage them to report their concerns.</p> <p>14 Turning now to the evidence heard by the inquiry, it 15 is clear that the Jewish community comprises a wide 16 range of communities. Within this range, the 17 United Synagogue sits in the middle, with the more 18 conservative Haredi communities on the one side and the 19 more progressive communities on the other. The evidence 20 as to the very different nature of the Jewish 21 communities serves to highlight the importance of 22 considering safeguarding needs by reference to the 23 particular context of each community, and the context of 24 the very different manner in which their members engage 25 with their synagogue, their rabbi, other members of</p> <p style="text-align: center;">Page 111</p>	<p>1 the community and, indeed, British society generally. 2 As Dr Wilson explained, the Jewish faith of 3 the United Synagogue members is a faith that values and 4 encourages active participation in British society at 5 large. As such, the average member of 6 the United Synagogue is fully integrated into ordinary 7 British life, playing an active role in wider British 8 society.</p> <p>9 Children go to schools which provide mainstream 10 education. The understanding of the dangers of abuse, 11 whether by parents or children, is no different from 12 that of broader society. Whilst that is not to say that 13 further efforts should not be made to inform and protect 14 children, the further action needed is driven by 15 development in the understanding of abuse and protective 16 measures, as opposed to any need to remove constraints 17 arising from how members practise their faith.</p> <p>18 The distinction between the spiritual and the 19 practical is reflected by the clear delineation of 20 responsibilities between the Chief Rabbi and the 21 United Synagogue. The Chief Rabbi is the spiritual and 22 moral leader of the community, whereas the 23 United Synagogue is the body responsible for the 24 practicalities of running the communities that form part 25 of the United Synagogue.</p> <p style="text-align: center;">Page 112</p>

<p>1 A further feature of the evidence heard by the 2 inquiry is the very different structure and nature of 3 organisations representing the different Jewish 4 communities. On the one hand, the inquiry heard 5 evidence from the United Synagogue which described 6 a centralised structure with rabbis and staff being 7 centrally employed, synagogues and buildings centrally 8 owned, qualities and practices, whether safeguarding or 9 otherwise, centrally produced. As the evidence of 10 Dr Wilson illustrated, the net result of this is 11 a professional organisation able to support, communicate 12 and exert a considerable degree of control over the 13 practices and procedures adopted by its member 14 synagogues.</p> <p>15 On the other hand, there was also evidence of very 16 different organisational systems with far looser 17 connections between a central body and individual 18 synagogue, thus making it more difficult to identify 19 a consistent approach adopted across different and 20 disparate communities.</p> <p>21 Despite the many positive steps that have been 22 achieved, there is still a great deal of work to do. 23 Whilst there is a clear need for religious and cultural 24 sensitivity in dealing with religious communities, the 25 United Synagogue recognises the significant benefits</p> <p style="text-align: center;">Page 113</p>	<p>1 that can accrue from having guidance, standards and 2 advice provided by a public body which, having no 3 connection to a particular religion, is seen as 4 independent and objective. In this context, the 5 United Synagogue considers there would be a real benefit 6 in having an independent regulatory body to set clear 7 minimum safeguarding standards and to monitor adherence 8 to those standards. The body would need to be 9 religiously literate but independent of any particular 10 religion. Moreover, the system would need to be 11 structured in a way to avoid placing an excessive 12 administrative burden on communities and provide 13 religious communities with discretion as to how best to 14 achieve the safeguarding standard.</p> <p>15 The United Synagogue would also welcome, given the 16 significant number of volunteers who help in various 17 capacities, clear practical guidance as to the best 18 practice for working with volunteers.</p> <p>19 In conclusion, for many years now, the Chief Rabbi 20 has used his position to speak out publicly on matters 21 pertaining to child protection. He has written 22 personally to all his communities on the subject. He 23 has met victims of abuse and has publicly endorsed 24 victim support organisations in the Jewish community. 25 This morning, the Chief Rabbi took the opportunity to</p> <p style="text-align: center;">Page 114</p>
<p>1 further reiterate his support for the work being done by 2 the inquiry. (Interference) the community to engage 3 with this work and any recommendations made.</p> <p>4 Lastly, no-one who heard the evidence of Dr Wilson 5 can have had any doubt as to the wholehearted commitment 6 of the United Synagogue to developing and improving its 7 approach to protecting children from abuse and to 8 carrying out effective and impartial investigations into 9 allegations of abuse. The United Synagogue, therefore, 10 welcomes any assistance the inquiry can provide in 11 helping it to achieve these objectives, whether through 12 its analysis of the safeguarding measures in place or 13 any recommendations as to how the United Synagogue can 14 better engage in multi-agency safeguarding of children.</p> <p>15 Madam, panel, thank you very much.</p> <p>16 THE CHAIR: Thank you, Mr Payne. Ms Jefferson? 17 Closing statement by MS JEFFERSON 18 MS JEFFERSON: On behalf of the Union of Orthodox Hebrew 19 Congregations, I am asked to reiterate the thanks 20 expressed by Rabbi Baumgarten for the opportunity to 21 participate in the important work of the inquiry. 22 Participation has afforded the opportunity for the 23 Union to stop and think about what it has done, is doing 24 and will do in the future to safeguard the children 25 within its community.</p> <p style="text-align: center;">Page 115</p>	<p>1 Unlike some other religious bodies, such as the 2 United Synagogue or the Federation of Synagogues, the 3 Union does not operate synagogues or children's 4 services. It therefore has a less direct role in 5 safeguarding compared to these and other organisations. 6 But notwithstanding this, the Union and the rabbinate 7 have influence and authority within the community.</p> <p>8 This has been used to give the fullest support to 9 the development of safeguarding work. In particular, 10 the Union has supported the training and development 11 work of the Interlink Foundation and Shema Koli. These 12 organisations have trained many hundreds of community 13 professionals, volunteers and leaders to standards set 14 by local children's safeguarding boards. These 15 organisations are also engaged in direct work with 16 members of the community, including children, to raise 17 awareness of safeguarding, to prevent abuse from 18 happening and to help victims, and the Union will 19 continue to work with these organisations as it 20 considers the emerging learning from the inquiry.</p> <p>21 The Union wishes to be clear that it, as well as 22 other Haredi organisations, are used to working 23 co-operatively with secular organisations and with the 24 authorities. This is important for the community and 25 for social cohesion.</p> <p style="text-align: center;">Page 116</p>

<p>1 Working together is most effective when based on 2 shared understanding and trust. When working with 3 statutory and secular organisations to keep children 4 safe, the Union and other Haredi organisations bring 5 important experience and insight. The May 2020 City and 6 Hackney Safeguarding and Child Protection Policy 7 Guidance speaks about the need to improve understanding, 8 listening and engagement with local communities, 9 including harnessing of experience to both inform and 10 improve safeguarding.</p> <p>11 The Union would like to note that this is what 12 Rabbi Baumgarten meant when he spoke about the need to 13 engage and negotiate. He was referring to the Union's 14 strong commitment to working with different 15 organisations to consider, work through and agree the 16 best ways to keep children safe in the context of their 17 community, as recommended in the May guidance.</p> <p>18 There are very many instances of successful 19 co-operation between secular organisations and the Union 20 and other Haredi organisations. Where engagement has 21 not succeeded, then further work is likely to be needed 22 and lessons learned about what has not worked. It is 23 the Union's intention to work with and support all 24 relevant agencies to learn from this inquiry and to 25 continue to strengthen the way children are protected</p> <p style="text-align: center;">Page 117</p>	<p>1 from harm in their communities.</p> <p>2 Thank you.</p> <p>3 THE CHAIR: Thank you, Ms Jefferson. Ms Sanderson?</p> <p>4 Closing statement by MS SANDERSON</p> <p>5 MS SANDERSON: Thank you, and good afternoon, chair and 6 panel. On behalf of the Baptist Union of Great Britain, 7 may I start by saying that it has been a privilege to 8 contribute to the work of this inquiry. The process of 9 gathering data and preparing evidence to present to the 10 inquiry has been a helpful learning experience in itself 11 and our safeguarding teams are already working on 12 improvements to policy and practice as a result.</p> <p>13 Our trustees, leaders and safeguarding teams have 14 welcomed the opportunity to review our past and current 15 safeguarding policies and practices and are committed to 16 continuing to improve the way in which we deal with 17 safeguarding matters, both proactively, in terms of 18 policy, training and support, and reactively, in terms 19 of supporting all of our churches to work well alongside 20 statutory authorities to respond to allegations of abuse 21 and to provide support and care for those who have 22 experienced abuse in any form.</p> <p>23 As this thematic investigation draws to a close, we 24 would want to emphasise again the commitment made within 25 our Baptist Union to aspire to excellence in</p> <p style="text-align: center;">Page 118</p>
<p>1 safeguarding. We make this commitment because it is the 2 right thing to do, because we have legal and societal 3 responsibilities, and because we are active and involved 4 leaders in our local communities.</p> <p>5 However, we do not do this simply to comply with the 6 law or to meet the expectation of others. We hold 7 ourselves to this standard because of our faith in, and 8 thankfulness to, a loving, just and holy God.</p> <p>9 Effectively safeguarding children and adults at risk at 10 part of the outworking of our faith and underpins our 11 outreach and activity in our local communities.</p> <p>12 Listening to the evidence given throughout the 13 hearing process, it is clear that differing 14 denominations and faith-based groups see safeguarding in 15 quite different ways. We cannot comment on the 16 doctrinal and policy approaches of other faiths, but we 17 do have clear views on the role that Christian churches 18 can play.</p> <p>19 We already participate in the Christian forum of 20 safeguarding with the safeguarding leads from many of 21 the major Christian denominations.</p> <p>22 We strongly believe that this type of joint working 23 is vital to improving the quality and consistency of 24 safeguarding in UK churches. We would want to actively 25 encourage the engagement of local and national</p> <p style="text-align: center;">Page 119</p>	<p>1 government organisations and departments with a far 2 wider range of Christian denominations, recognising that 3 the church is not just the Church of England. The 4 Baptist Union has learnt much from the safeguarding 5 practices of the Methodist Church and the Salvation 6 Army, and we are keen to share anything that is helpful 7 from our own progress over recent years.</p> <p>8 In terms of the wider group of faith-based 9 communities in the UK, we would welcome and would 10 actively participate in action-orientated, multi-faith 11 groups to share safeguarding good practice, particularly 12 where these enable smaller groups with limited resources 13 to benefit from the work already done by others. We 14 believe that there is great scope for better engagement 15 between statutory authorities and all faith-based 16 groups, and that improved working relationships will 17 inevitably result in better safeguarding outcomes for 18 children.</p> <p>19 Finally, through our ongoing work, including our 20 historical case review process, we recognise with great 21 sorrow that there are people who have been abused as 22 children or as adults in Baptist churches or by those 23 connected with our churches. It is a cause of great 24 regret that we cannot change some of the things that 25 have happened in the past, but we are spurred on to</p> <p style="text-align: center;">Page 120</p>

<p>1 continue to build safeguarding frameworks and to train 2 and equip safeguarding leaders so that it is far more 3 difficult for abuse to happen in our churches and to 4 make sure that we offer compassion, care and practical 5 support to those who have experienced abuse, whether 6 through their church, their family or elsewhere.</p> <p>7 We are grateful to the inquiry for this opportunity 8 to provide a brief closing statement today and offer the 9 support of the Baptist Union of Great Britain to all 10 necessary actions and improvements coming out of 11 the inquiry's findings and recommendations.</p> <p>12 Chair, thank you very much.</p> <p>13 THE CHAIR: Thank you, Ms Sanderson. Mr Athanasiou? 14 MS SCOLDING: Chair, I did see Mr Athanasiou. At least five 15 minutes ago, he appeared on screen. Ah, here he is.</p> <p>16 Closing statement by MR ATHANASIOU</p> <p>17 MR ATHANASIOU: Sorry for that.</p> <p>18 Good afternoon, chair and other participants in this 19 hearing. On behalf of the United Reform Church and its 20 safeguarding advisory group, we want first to thank all 21 the witnesses and representatives from other core 22 participants for their courage and wisdom during this 23 hearing.</p> <p>24 We recognise the importance of this investigation 25 and the duty of all religious organisations to be</p> <p style="text-align: center;">Page 121</p>	<p>1 continually working towards making their communities and 2 places of worship safer places for children and young 3 people.</p> <p>4 Our church has been taking significant steps forward 5 in the last years. In line with our principle that 6 safeguarding is everybody's responsibility in the United 7 Reform Church, we have been making improvements and 8 learning from the past as well as from the front-line 9 practice. The courageous process of the Past Case 10 Review in 2016 and 2017, the adoption of a five-year 11 safeguarding certificate plan starting this year up to 12 2025, the update of Good Practice 5, which is our main 13 safeguarding policy document, a reference group for 14 adult survivors of abuse and the development of 15 a standardised safeguarding training programme for the 16 whole denomination are some of our good developments.</p> <p>17 Last month, the General Assembly of the church 18 reinforced our duty of care for one more time. And 19 directed all local churches, synod and all those who 20 oversee safeguarding in the church to implement the 21 safeguarding strategic plan in ways that promote the 22 welfare and the well-being of all the individuals with 23 whom the church comes into contact.</p> <p>24 General Assembly was an opportunity to publicise the 25 first annual safeguarding report for the denomination.</p> <p style="text-align: center;">Page 122</p>
<p>1 The ongoing collation and analysis of data forms a key 2 element of quality assurance work. The first 3 denominational safeguarding report with data entrenched 4 being analysed over a three-year period since 2017 5 demonstrates our capacity to build on a robust internal 6 auditing process and work on compliance and transparency 7 within the denomination. We are mindful of the limited 8 resources in local churches, which are heavily dependent 9 on volunteers. However, we are committed to enhancing 10 good practice in safeguarding throughout the 11 denomination and supporting the hard work of church 12 safeguarding coordinators and synod safeguarding 13 officers to instil safeguarding in all local churches 14 and synods of the church.</p> <p>15 During this hearing, many different positions were 16 articulated regarding the regulation, scrutiny, 17 registration and inspection of faith organisations. As 18 mentioned in the opening statement, the United Reform 19 Church will be in favour of common standards in the 20 faith sector and self-regulating arrangements backed up 21 by an audit framework from an external independent body.</p> <p>22 We advocate for a denominational approach because of our 23 ability to review churches' policies and practices 24 across the denomination on a regular basis in alignment 25 with our safeguarding processes and procedures.</p> <p style="text-align: center;">Page 123</p>	<p>1 Finally, in closing this hearing, the United Reform 2 Church wants to ask for the inquiry not to overlook the 3 diversity of the faith sector, as reflected in different 4 theological traditions, diverse governance systems and 5 structures.</p> <p>6 IICSA's final report recommendations should consider 7 effective ways to enhance the participation of faith 8 organisations and groups in partnership and multi-agency 9 work with the statutory agencies within the context of 10 the existing statutory framework inside protection.</p> <p>11 Our church will be willing to take part in any 12 future consultation to achieve this aim and continue 13 working together with other denominations and statutory 14 agencies. We will also welcome any findings that will 15 be of great use for us and will assist us in ensuring 16 that every child and young person is protected from 17 experiencing, or being at risk of experiencing, sexual 18 abuse.</p> <p>19 Thank you.</p> <p>20 THE CHAIR: Thank you, Mr Athanasiou. Mr Humphreys? 21 Closing statement by MR HUMPHREYS</p> <p>22 MR HUMPHREYS: Thank you, chair and panel. It is clear from 23 the evidence that has been given throughout these 24 hearings that a huge amount of good work is taking place 25 to safeguard children across many religious and</p> <p style="text-align: center;">Page 124</p>

<p>1 faith-based settings. Examples of this have already 2 been provided in relation to the Baptist Union, 3 Methodist Church and United Reform Church, amongst 4 others. This is a huge encouragement, given the vast 5 amount of contact that these settings have with 6 children, and the significant influence that this brings 7 into their lives and the lives of their families. 8 There is no room for complacency and, acknowledging 9 some significant shortcomings, the Christian community 10 in this country has made perhaps more significant 11 strides towards this than many other groups and settings 12 within other faiths. It seems right that this should be 13 acknowledged. 14 However, it is also sadly clear that, in some areas, 15 examples of good practice are not so evident. In fact, 16 they have become very hard to find. Evidence shows us 17 that children have been seriously put at risk by the 18 wilful neglect of some, the naivety of others and the 19 malevolent intent of a smaller number to exploit and 20 abuse children in religious and faith settings. 21 It is unacceptable that there should be any denial, 22 avoidance or obfuscation of this truth. To do so makes 23 clear that children lack the priority and value that 24 they deserve in our society. 25 It may seem obvious to state that one of the reasons</p> <p style="text-align: center;">Page 125</p>	<p>1 for this variation that we see in safeguarding of 2 children across this wide variety of settings is a lack 3 of consistent standards and accountability. In too many 4 cases, we have heard of children and young people being 5 let down by an absence of arrangements that adequately 6 safeguard their welfare. This can only be rectified, we 7 believe, by concerted and clear efforts towards root and 8 branch reform. These efforts must include a much 9 greater awareness and inclusion of activities provided 10 for children within these contexts through legislation, 11 statutory guidance, support and intervention. It is no 12 longer acceptable to continue with the disjointed 13 approach that exists across government departments and 14 public bodies which has perpetuated a lack of 15 collaborative effort and accountability. The 16 expectations set in this regard must be shown to affect 17 practice at grass roots level. Greater confidence must 18 be found in these activities and a removal of any 19 disparity between the safeguarding of children in one 20 setting and another. In some cases, this will require 21 a greater level of intervention from specialists outside 22 of organisations to assist improvement and to bring 23 sanctions where this is found to be necessary. This 24 requires the full support of the government through law. 25 We have heard ample evidence throughout these</p> <p style="text-align: center;">Page 126</p>
<p>1 hearings to support such reform. 2 In calling specifically for changes to law and its 3 supporting provisions, we strongly support the need for 4 further independent oversight and scrutiny of 5 safeguarding arrangements in a wider range of settings. 6 To be clear, this is not the registration and regulation 7 of religious and faith groups per se; it is a broader, 8 more encompassing regime in which faith settings may be 9 included. One in which such specified activities taking 10 place within religious and faith groups are no longer 11 seen to be outside of the arrangements expected of other 12 settings providing the same activities. Calls that such 13 measures would restrict religious freedoms are erroneous 14 and only serve to further erode the rights of children 15 to freedom from exploitation, violence and abuse and the 16 safeguards they should rightly expect within all the 17 settings within which they become involved. If any 18 group or setting is to undertake care, training or 19 supervision of children, it should do so to the best of 20 its ability and accept both the standards and the 21 scrutiny that might be applied to such an important 22 aspect of children's lives. 23 The development of safer cultures underpinning these 24 things cannot be overstated. 25 We would like to see clear and strong</p> <p style="text-align: center;">Page 127</p>	<p>1 recommendations from this inquiry relating to the extent 2 of change needed in areas such as positions of trust, 3 regulated activity, mandatory reporting, external and 4 independent registration and scrutiny via a new body, 5 redress for victims and survivors, robust whistleblowing 6 and complaints management mechanisms, consistent 7 standards-based frameworks and clearer responsibility 8 and accountability of government departments and 9 agencies for safeguarding in relevant settings. 10 You may be aware that the recent interfaith work 11 that we have led with the APPG on Safeguarding in Faith 12 Settings has begun to see some movement with the 13 Ministry of Justice in relation to revising the Sexual 14 Offences Act 2003. This points clearly to the need to 15 broaden the application of positions of trust to a wider 16 range of roles and settings, including faith-based 17 settings. 18 We would especially urge you to continue in your 19 efforts to state the need for this in your 20 recommendations to government. 21 In my role as chair of the Christian forum for 22 safeguarding and advisor to that APPG, I am confident 23 that there is commitment to pursuing high standards of 24 safeguarding from among the professionals that are 25 deployed in religious and faith groups for this purpose.</p> <p style="text-align: center;">Page 128</p>

<p>1 However, this is not always matched by religious leaders 2 and influences more widely, who will often perpetuate 3 the disconnect between their communities and statutory 4 agencies. Many good efforts are destroyed both through 5 this and the protection of the institution or God's name 6 that all too often become the driving force when abuse 7 takes place.</p> <p>8 We are past the time when this can be allowed to 9 continue. As has been said, child abuse is child abuse 10 in any context or culture. I would add religion or 11 faith specifically to this and ask for your courage and 12 determination to fight any alternative suggestion.</p> <p>13 I would finally like to restate the point that 14 I made in my opening statement to these hearings: given 15 the sheer scale of engagement between faith settings and 16 children in this country being second only to a child's 17 statutory education, it remains a serious concern that 18 this is not met with a proportionate focus upon such 19 settings and their activities through statutory 20 frameworks and resources.</p> <p>21 Her Majesty's Government needs to pay serious 22 attention to how this can be rectified for the sake of 23 all children and their welfare.</p> <p>24 I thank the chair and panel for their leadership 25 through this extremely complex investigation and urge</p> <p style="text-align: center;">Page 129</p>	<p>1 you to press on and dig deep as you seek to arrive at 2 recommendations that will bring real and lasting change 3 where this is so needed. Thirtyone:eight remain 4 committed to any support we can offer to the 5 identification and implementation of such changes in the 6 months and years ahead. Thank you.</p> <p>7 THE CHAIR: Thank you, Mr Humphreys. Lastly, Ms Idelbi? 8 Closing statement by MS IDELBI</p> <p>9 MS IDELBI: Thank you, chair and panel. The 10 Charity Commission is grateful for the opportunity to 11 participate in this strand, and I reiterate the 12 Commission's dedication to the important work of 13 the inquiry and its own work to ensure child protection 14 and safeguarding within the charitable sector.</p> <p>15 This brief statement could not possibly deal with 16 all the issues for consideration, but it is hoped that 17 our written submissions will provide the inquiry with 18 practical assistance in answering the central question 19 of, where is there a deficit in the practice of child 20 protection in religious organisations and settings and 21 what can be done about it?</p> <p>22 With that, it is hoped that the inquiry can clearly 23 see where its findings and recommendations will have the 24 greatest and most effective impact. For now, I simply 25 make three headline submissions.</p> <p style="text-align: center;">Page 130</p>
<p>1 Firstly, on the Commission's specialist role, 2 counsel to the inquiry observed in opening that the 3 Commission's oversight is extremely limited. Whilst the 4 Commission does have a limited role in safeguarding, 5 that limitation is not synonymous with limited 6 significance or limited rigour with which its role is 7 carried out. Stamping out child sexual abuse requires 8 action on all fronts. The Commission's specialist role 9 deals with another dimension of the problem: it is 10 directed to the trustees to encourage an internal 11 culture and practice of taking child protection 12 seriously. The Commission hopes that its evidence on 13 the challenges it has faced where safeguarding has been 14 intimated demonstrates that it is not reluctant to use 15 its statutory powers to investigate where there are 16 concerns about a charity's practice in child protection.</p> <p>17 The Commission is committed to its specialist role. 18 This is evidenced from its guidance, proactive activity 19 and the creation of a regime for reporting special 20 incidents where there was no statutory catalyst for 21 such.</p> <p>22 The Commission develops and continues to develop. 23 It considers its work critically, learning from its 24 experience, its outreach work, its casework and, of 25 course, this inquiry. The Commission is reflecting on</p> <p style="text-align: center;">Page 131</p>	<p>1 the sufficiency of its powers, considering the full 2 life cycle of the charity, but that reflection needs to 3 take into account the legislative, operational and 4 funding limitations that the Commission faces. The 5 Commission invites the inquiry to take account of those 6 factors as well.</p> <p>7 Secondly, the appropriate regulator in this space. 8 It had been proposed that the Commission expand to 9 regulate all religious organisations and settings. 10 Given its specialist role, the Commission maintains that 11 it is not the appropriate regulator, principally because 12 the legal framework essentially engages the Commission 13 depending on status. To regulate those who do not come 14 within the legal definition of a charity will require 15 a complete rewrite of the legal framework in which the 16 Commission operates, with serious consequences for the 17 entire sector. Practically, the Commission is not 18 staffed, empowered or funded as an inspectorate.</p> <p>19 The Commission respectfully suggests that there are 20 other organisations that are better suited in terms of 21 their structure, operations and expertise to their roles 22 being expanded to have oversight of activities that 23 interact with children.</p> <p>24 Thirdly, religious organisations have been asked 25 about whether they would benefit from having template</p> <p style="text-align: center;">Page 132</p>

<p>1 child protection policies and audits of such. The 2 question of policies needs to be considered from two 3 angles: from the perspective of those who may lack the 4 requisite awareness; and from the need to avoid notional 5 compliance. From the first angle, the minimum standard 6 of an appropriate child protection policy must include 7 consideration of the nature of the risk to a child in 8 the context of the charity's work, something a template 9 could never capture. The risks to children in 10 a supplementary learning environment will be different 11 to the risks to a child attending a food bank. The 12 purpose of the policy is for it to be implemented. It 13 is incumbent on religious charities, like any other 14 charity, to do the work for there to be any confidence 15 that that policy will be implemented. 16 You have heard evidence from a number of 17 organisations, including the Commission, on the services 18 they provide or signpost to, and have heard some 19 examples of other charities who have done that work. 20 With the resources available, if religious 21 organisations cannot, or will not, motivate themselves 22 to create a child protection policy now, how motivated 23 will they be to implement that policy with a template? 24 From the second angle, concern has been raised by 25 the Commission and other core participants about the</p> <p style="text-align: center;">Page 133</p>	<p>1 risk of organisations skirting the edges of compliance. 2 There are no fixed terms prescribed by the Commission 3 for the very reason that a safeguarding policy must be 4 bespoke, and by not giving hard edges to charities to 5 comply with, there are no hard edges around which an 6 organisation can skirt. It is submitted that any 7 recommendations must avoid inadvertently constraining 8 bodies, such like the Commission, from doing its work or 9 which allow organisations to skirt the edges of 10 compliance. 11 For instance, were the Commission or other regulator 12 required to audit a religious organisation's policy, it 13 has obvious ramifications for regulatory action later if 14 that policy is ultimately inappropriate for the risks 15 that did, in fact, exist within a charity. No regulator 16 could know the full extent of a charity's operations, 17 even if it were to spend extensive time in the charity, 18 especially, as you have heard, if there is secrecy that 19 surrounds a particular practice or if the charity 20 refuses to accept that that practice exists. 21 If the regulator is hindered in holding 22 organisations to account, then that means poorer 23 outcomes for children, and that is something that the 24 Commission wants to avoid. 25 Mr Grenville set out in his evidence some of</p> <p style="text-align: center;">Page 134</p>
<p>1 the areas for strengthening powers around child 2 protection and the Commission will set out those matters 3 further in its written submissions. 4 Thank you. 5 THE CHAIR: Thank you, Ms Idelbi, and thanks to everyone for 6 being so succinct. I should just add that the 7 Methodist Church has indicated that it will not be 8 making an oral closing statement, but has submitted 9 a letter, dated 25 June 2020, which they have asked us 10 to publish on the inquiry's website. The URN for the 11 letter is MST000155. 12 Before I close, Ms Scolding, do you wish to add 13 anything? 14 MS SCOLDING: No, chair, simply to say thank you to all core 15 participants and, in particular, to say thank you to the 16 legal team who have assisted us so professionally over 17 the past three weeks, in particular given the 18 unprecedented circumstances into which we were forced 19 after we had to cancel the hearing first in March. So 20 I just wish to thank them. Thank you. 21 Closing remarks by THE CHAIR 22 THE CHAIR: Thank you, Ms Scolding. I am going to say 23 something similar myself. Myself and the other panel 24 members are very grateful to those who have provided 25 evidence to the inquiry for the purposes of this</p> <p style="text-align: center;">Page 135</p>	<p>1 investigation. We appreciate your efforts in bringing 2 information to the inquiry's attention for us to 3 consider and, in particular, we would like to thank the 4 victims of child sexual abuse for their courage in 5 speaking out about their experiences. 6 This investigation has proceeded against the 7 backdrop of a pandemic and national emergency, which has 8 impacted everyone in ways we could not have imagined. 9 We recognise the pressures that this has placed on each 10 of you, both personally and professionally, and we are 11 grateful for the flexibility and patience you have all 12 shown us when we were required to suspend the hearing 13 in March to comply with government guidance and to 14 reconvene in the form of virtual public hearings in May 15 and now in August. 16 We will now consider all of the evidence and 17 submissions we have heard and produce our investigation 18 report. We expect to be able to publish this report in 19 the early summer next year. Thank you all. I now draw 20 this hearing to a close. 21 (3.15 pm) 22 (The hearing concluded) 23 24 I N D E X 25</p> <p style="text-align: center;">Page 136</p>

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