
Independent Inquiry into Child Sexual Abuse
Investigation of Child Protection in Religious Organisations and Settings
Closing Written Submission by the Evangelical Alliance UK

1. The Evangelical Alliance is grateful to the Chair and Panel for involving us as a core participant in the Independent Inquiry into Child Sexual Abuse (IICSA) investigation into Child Protection in Religious Organisations and Settings. In engaging with the Inquiry as it has collected evidence, and in comparing our experience and policies with those of other participants, it has been a useful opportunity to assess our own practices, and the needs of the wider evangelical Christian community in the area of child safeguarding.
2. We are particularly grateful to the many survivors of child sexual abuse in religious settings who have shared their experiences with the Inquiry. We recognise the great suffering inflicted on these survivors, and hope that the examination of their experience in the context of IICSA will lead to real and lasting change. We are also thankful for the significant amount of good work being done to safeguard children across many Christian and other religious settings. While work remains to be done, it is important to acknowledge as others have said, that the Christian community has made significant strides forward in this regard.¹
3. We look forward to engaging with the Inquiry's recommendations for religious organisations in due course. As in other investigations by the Inquiry, which have covered a wide variety of religious and non-religious contexts, it is clear that there is more to be done. This closing submission will not repeat all the positions which we set out in our initial witness statement, and in the hearing on May 20th. Instead, in it we will seek to clarify some points which arose in that evidence, and engage with some of the proposals made by other participants.
4. The issue of religious freedom was raised by the Inquiry and surrounding commentary in discussions around child protection in religious contexts. Some who work in this area have been concerned that appeals to religious freedom may seek to exempt religious communities from requirements which apply to everyone else. Others have expressed the fear that such arguments may obstruct necessary child protection measures, intentionally or otherwise, or even that those who raise these concerns would reject any child protection measures as violations of religious liberty.

¹ See the closing statement of Thirtyone:eight (<https://www.iicsa.org.uk/key-documents/21108/view/public-hearing-transcript-14-august-2020-.pdf>; page 125, lines 1-13).

5. The Evangelical Alliance is clear that child sexual abuse is always wrong and that religious freedom should offer no cloak of protection for it. However, we believe some of the perspectives articulated may misunderstand religious freedom. Child protection and religious freedom are not two alternative priorities when working with children, of which we can only choose one. This perspective creates a false and unnecessary dichotomy. Instead, both are necessary and as in the case of other human rights, the most effective child protection regulation for everyone is that which respects the rights of those it regulates – whether religious or non-religious. This should not in any way be construed as a right for perpetrators to continue to abuse children. Rather, it is the right of all members of the religious community, adult and child alike, to practise their faith, and so safeguarding measures should be examined for their impact on the entire religious community. The Inquiry heard evidence that it is possible to have robust child protection policies in place, the implementation of which presents no difficulties in relation to religious freedom. We look forward to engaging with the Inquiry's recommendations in that light.
6. An illustration of such concerns being handled well can be seen in the response of Parliament's Joint Committee on Human Rights to the 2015 proposals to register and inspect out-of-school settings. The hearing on May 20th referred to the conclusion of the committee on this policy, in its 2016 report on the Government's counter-extremism measures. The Committee concluded, in paragraph 74 of this report:

The need to safeguard children from neglect, physical harm and sexual abuse is well understood. But it is rather less clear how one can draw a line between religious freedom and requirements for safeguarding that genuinely protect children. While there may be some argument for safeguarding measures to be introduced in out-of-school settings, these should not be specifically aimed at religious activities, nor are we convinced that existing safeguarding measures are inadequate in this regard. Any new measures should be proportionate, focused, and should only apply where identifiable concerns about the safety or wellbeing of children and young persons have been raised within a particular institution. We do not support a regime of routine inspections of out-of-school settings. We are aware of the very grave concerns around Government proposals for a regime of compulsory registration. We reserve the right to return to this issue if and when we see detailed proposals from the Government.²

The Evangelical Alliance believes that this conclusion represents a reasonable engagement with the Government's proposal on human rights grounds.

7. This recommendation, and the approach of the Committee more generally, may be useful to the Inquiry for a number of reasons. First, the Committee does not simply set child protection against religious freedom. Instead, it notes that certain specific features of the 2015 policy could be questioned on their proportionality and equal

² <https://publications.parliament.uk/pa/jt201617/jtselect/jtrights/105/105.pdf>

applicability to all faiths and none. Secondly, the report highlights that these concerns were widespread, and did not just come from religious groups. Finally, the report warns against the conflation of important child protection work on the one hand, and debates around extremism on the other, a point raised by Counsel to the Inquiry in her opening statement.³ We hope that the Inquiry will engage with the Committee's work as it formulates its recommendations for religious communities.

8. The Evangelical Alliance was generally encouraged by the Inquiry's positive engagement with the faith sector. We reaffirm the social value of religion to civil society – as a glue which binds communities and imbues duties and responsibilities with regards to caring for and nurturing children. The faith sector's engagement with children is second in scale only to the education sector. Much of this engagement is provided by volunteers. Given this scale, and the fact that much of it is voluntary rather than paid as in the state sector, it is important to engage and understand the faith sector. This could be helped significantly by better faith literacy across the safeguarding and charity sectors, and the Evangelical Alliance is willing to play its part in building this.
9. The Evangelical Alliance remains unconvinced that requiring umbrella bodies to insist on safeguarding policies as a requirement of membership would be beneficial. One of the major issues around child protection is clarity, and insisting that a variety of umbrella bodies require policies would instead introduce more confusion. We will continue to signpost good practice and support cultural changes with respect to child protection policies. While the Charity Commission has said it does not currently regulate child protection policies within charities, they would be the obvious single body to do this.
10. With respect to settings, we want to ensure that the Inquiry understood the significance and point of our submission as there seemed to be some confusion during evidence. Churches and Christian groups meet in a wide variety of places including homes, cafes, and other hired venues. We are concerned that the lack of definition and parameters in previous government proposals on religious settings could be problematic for faith groups. To give one example, without clarity the owner of a venue could become liable for the safeguarding of settings that meet within it, and could therefore be less likely to allow the venue to be used for religious purposes. In our opinion, any new policies should be based on the nature of the work – i.e. with children, rather than the setting – i.e. that it is a religious setting.
11. The Evangelical Alliance is not convinced by the evidence for inspection and audit presented to the Inquiry. If, contrary to the evidence, this were to be recommended, there should be a diversity of approved suppliers, in the same way as a financial audit. During the evidence given on May 20th there were repeated questions as to why there couldn't be a single auditor and mention was made of a "sympathetic

³ <https://www.iicsa.org.uk/key-documents/17841/view/public-hearing-transcript-monday-16-march-2020.pdf>; page 77, lines 16-23.

auditor". This is to misunderstand the analogy we are drawing to an independent financial auditor. There is no such thing as a sympathetic financial auditor and there are a plethora of suppliers recognising the diversity of organisations which need auditing. Many charities for example, choose a financial auditor with charity experience. The charity sector is large and diverse and if any safeguarding audit is to happen, it should be carried out by a diverse range of auditors. This would also apply to training and inspection. This approach would allow charities to choose a supplier who understood the nuances of their sector whilst maintaining a range of independent and objective suppliers of these services.

12. On mandatory reporting, the Evangelical Alliance is supportive of measures which lead to allegations of child sexual abuse being reported to statutory authorities. We would be supportive in principle of moves towards mandatory reporting of allegations but would have concerns as to how this is practically defined and applied across all aspects of civil society. We do not believe that religious leaders should be treated any differently from other leaders in this regard.
13. To sum up, the Evangelical Alliance continues to believe that any fresh recommendations made on child protection should meet certain criteria. For example, they will need to account for diversity in the size and nature of religious settings, expecting high standards in safeguarding in every setting but recognising that delivery will look different in each. In addition, any new measures should apply to all settings that work with children, whether or not they are religious, and should be based on the nature of the work rather than the setting. At the same time, guidance should be available on how these general measures apply in the specific context of religious settings. We will engage with any new recommendations when they are proposed in detail.
14. The Evangelical Alliance has also been able to consider specific proposals made by other participants in the Inquiry. For example, in line with the vast majority of other participants, we would agree with the arguments put forward by the NSPCC and the APPG for Safeguarding in Faith Settings for the expansion of positions of trust in the Sexual Offences Act 2003. This would expand positions of trust to include those in a wider range of leadership positions, including in religious organisations, recognising that such figures have great responsibilities towards young people in their care. We believe that this proposal is a proportionate measure which can protect children, and is applicable across all settings in which they are looked after.
15. The Evangelical Alliance also agrees with others that the term 'regulated activity' is not sufficiently clear and appears to cause some confusion. There should be greater clarity as to who should be checked and at what level. However, we do not believe that the term "pastoral authority" is helpful and it could in fact lead to more confusion as it fails to understand the diverse meanings of that term in a variety of religious contexts.
16. We thank the Chair and Panel for their work through this extremely complex investigation. The challenge for the Inquiry is to recommend workable and effective safeguarding policies that protect children whilst recognising the important work

done by many charities and religious bodies. If policies and procedures become so onerous that voluntary organisations cannot function, then only the state sector will remain. Sadly, we know from other strands of this Inquiry that even stringent regulation of the state sector has not prevented problems, and many children would suffer from the lack of voluntary services which fill significant gaps in overall provision. The Evangelical Alliance remain committed to supporting evangelical churches across the UK in their mission to make Jesus known. We are theologically and organisationally committed to the thriving and flourishing of everyone and are opposed to child sexual abuse in any and all of its forms. We will continue to review ways in which we can signpost and highlight best practice to our members with respect to safeguarding. We will be praying for the Panel in its deliberations and look forward to the conclusions and recommendations of this Inquiry.