

SAVE THE PARISH

SOME GUIDANCE TO YOUR RESPONSES TO 'A MISSION IN REVISION' PAPER GS2222 – PLEASE OBJECT BY 30TH SEPTEMBER 2021

This short note has been compiled to highlight what STP has so far identified as the most concerning elements of the green paper GS2222. If you are here as a supporter or member of STP, it is likely that you will have already read of the concerns expressed by others and will be motivated to help. We hope that this document will assist you in making an individual response to the paper. **It is essential that those of us who want to prevent some of the most worrying changes to the law and practice of the Church in relation to parish matters make our concerns plain and fully understood. Every response counts.**

In responding to the paper, we recommend that you concentrate on the following issues. A much fuller explanation of them is set out in a paper already written and submitted by one objector, which is also available on the STP website. However, the consultation period is short - and time is of the essence - so we have tried to assist your response by pointing out the main problems. (These documents are intended as a guide to the issues, not as legal opinion or advice. Please use your own words, and refer to your own situation, if you can. Your objection will be more powerful if you personalise it.)

As with all consultations, the more responses that those behind these changes receive, the more powerful will be our voice. **Even if all you can do before 30th September is to send a line or two in relation to each of the matters set out below, that will help. The main thing is to write it and send it.**

Issue 1 – Consultation on This Paper

- (i) In this paper, para 27, bullet point 2 shows that dioceses are already planning up to 356 planned closures in the next 2-5 years. This would treble the previous closure rate of 20-25 per annum (bullet point 4 on p14). Although the church authorities say that this is now the time for consultation, the simple fact is that they have published document GS2222 which is *already* the blueprint for profound and worrying change, and have done so having consulted only a tiny fraction of those who have an interest in the matter. Consultation took place only with “diocesan secretaries, archdeacons, pastoral secretaries and closed church and property officers” (para 26). Those are the people who will gain most powers by the measures proposed, and it is not surprising that they may support them.
- (ii) Therefore, the first point to make is that before the sort of changes that this paper proposes are even thought of, there should have been much wider consultation with all of those who may be affected by them. A failure of consultation can make a big difference in legal terms, so this point should be made strongly. Tell the church that you want to have been consulted BEFORE they propose such sweeping and potentially damaging changes, not after!!

Issue 2 – Strategic Context

- (i) The paper says that it is written in a ‘Strategic Context’ (page 15). That is a piece of management-speak which in fact gives a clear clue as to why the changes are proposed. The ‘Emerging Church’ programme is given as the reason why the centralisation of legal and financial powers are necessary.

(ii) However the Emerging Church programme has not yet made any proposals at all. There are no clear results from any of the 3 strands of review set out in para 19 of the document. That means that these huge changes are being proposed before it is even known why and to what extent they will be needed. They propose a mechanism for destruction of parish rights before even knowing why those powers are required.

(iii) The concern of STP is that there is already a movement to do away with what those who already seek to weaken traditional parishes describe as 'key limiting factors'. By that they mean church buildings and trained clergy. The proposal of thousands of 'house churches' is already part of this effort and is supported by a number of those consulted before this paper was published.

(iv) We suggest you tell the church that it should work out where it is going BEFORE deciding what it needs to get there. Making changes without understanding all relevant considerations is also very important in legal terms, and this point should also be made strongly.

Issue 3 - Parish governance, reorganisation and closure

(i) The procedures for changes to parish governance, reorganisation and church closures are a major part of the document. The legal procedures for merging parishes, reorganising them into any form of group ministry or for closing particular churches are long established and, yes, can be complicated.

(ii) However, they are complicated **because** the governance and reorganisation of parishes affects many people. The Church of England is a national church. Every citizen lives in a parish and has a right to its basic forms of ministry. STP believes that this means that before any serious reorganisation of ministry the whole community has a right to be heard. The green paper GS2222 proposes that much of that consultation should be dispensed with and confined only to those who regularly use the church. However, others such as parish councillors and other community leaders may have a real interest in what happens.

(iii) In addition, GS2222 proposes that **appeals** as to what happens to parish property and the parish church if a closure occurs **should go only to the diocese** that proposes to close or dispose of that property. They therefore become the judge, even though they stand to reap a financial benefit from closure. At present the appeal route includes the more independent Church Commissioners and if necessary the Courts by way of the professional judges of the Privy Council.

(iv) STP of course realises that there are times when parishes have to reorganise and sadly that some churches close down. However, we ask that you make these important points:

- (a) Before any merger or closure of a parish, the need to *consult the whole community* must remain as it is now. Only then can those in charge be sure that all voices are heard.
- (b) If a parish is reorganised so that its minister is to be removed from office, there must be a clear and fair legal procedure, so that he/she has full rights to re-deployment or fair compensation for loss of income, home and mission which takes into account age, length of service and so on. This must go beyond just a diocesan committee and must include an independent process (as in an Industrial Tribunal).
- (c) Parish property that is not already under the control of the diocese (usually the parsonage house and the church building, but possibly also other trusts and donations) should remain in the control of the parish, and any financial gain on

disposal should be used for parish purposes before any consideration is given to centralising it under diocesan control.

- (d) The procedures for reorganisation and change of parishes should not be changed without primary legislation and should allow full consultation as at present.
- (e) There must be no change to the appeal process. To prevent appeals going beyond diocesan level means that those who have an interest in the outcome end up being the 'judge in their own cause'. That is legally unacceptable. There is no need to change the appeal process.
- (f) Given the scale of planned reorganisations (350+ closures), simplifying processes should not be conflated with speed. Speeding up the process would contradict a national trend for more care, more consultation and increasing powers and use of judicial review (the Home Secretary's arrangements for housing refugees and the A303 at Stonehenge being recent, high-profile examples). Appeal processes by their nature take time.

If you wish to do further reading, you may like to see this article by Fr Christopher Johnson, reproduced here with the author's permission:

<https://allthingslawfulandhonest.wordpress.com/2021/07/14/power-grab-or-pastoral-measure/>

The official consultation questionnaire is tedious, with questions which seem rather loaded. If you have time please answer it as well, using the long example of a previous submission to help you with the questions.

<https://www.churchofengland.org/resources/parish-reorganisation-and-church-property/review-mission-and-pastoral-measure-2011>

In all cases, we suggest objecting by email, as the final page of GS2222 shows is permissible, to mpm2011review@churchofengland.org.

It urgently needs as many objections as possible. The deadline is 30th September.