

<https://www.churchofengland.org/more/media-centre/news/house-bishops-backs-phased-approach-revising-access-church-buildings>

RAB's reaction to: "House of Bishops backs phased approach to revising access to church buildings"

05/05/2020

By way of introduction, let me say at the outset how much **I welcome today's statement from the House of Bishops**, and their decision to proceed with an initial and gradual relaxation of the measures which were previously imposed around the closure of churches.

I want to say at the outset that I do appreciate how **extraordinarily busy** and rushed off their feet all the bishops are at the moment. Every bishop to whom I speak tells the same story of **enormous pressure**, moving from one Zoom meeting to another (and the evidence is rapidly mounting that full face contact in Zoom is more tiring psychologically because of its lack of body language and other clues we normally use to communicate) without even the usual physical breaks, or walks, or car trips between meetings with the chance to catch up or rest. I also appreciate that the bishops are trying to give a lead in a time of unprecedented crisis and at the same time support and pastor their clergy (and I have benefitted from several episcopal conversations myself in this regard, thank you).

However, this means that the opportunity to sit back and reflect on what is happening is denied them – and therefore perhaps the responsibility for this falls on those of us who are retired and on the sidelines in this situation, locked down with nothing else to do but think and write (the excellent article by **+Peter Selby** in the *Tablet* last week was a superb example of this). In that spirit I offer these reflections in an attempt to "**speak the truth in love**" to my episcopal friends and former colleagues – and pray that they might be able to receive it, although I say hard things, in that same spirit. And I also apologise for any offence or hurt caused by the previous circulation of these reflections – that was not my intent, sorry.

This is because I find the Statement profoundly worrying in its **use of language**. It would have been a golden opportunity, in an admittedly extremely complex and fast-moving situation to give the nation an example of how Christians can admit to having made a mistake, change their minds (which is what 'repentance', *metanoia*, means in Greek), apologise, and seek forgiveness and a new way forward in life – as indeed I am trying to do in this amended version. Instead, I fear that its use of language, with its 'doublethink', is regrettably typical more of the approach being taken by leading politicians on both sides of the Atlantic, than that of teachers of the faith and shepherds of Christ's flock.

For ease of reading, black Calibri text is the original statement from the bishops, with RAB's **yellow highlighting of key words**, while my comments are distinguished in blue Arial text, with key words emphasized in ***bold italics***.

The Statement reads: “The House of Bishops met via Zoom this afternoon, as it has done regularly throughout the current pandemic, and continued to review **advice** to clergy on the Church’s efforts to limit the spread of the coronavirus, to protect the vulnerable and health services.

In a discussion led by the Bishop of London, Dame Sarah Mullally, who chairs a group examining how the Church of England might proceed once the current restrictions for COVID-19 are relaxed or lifted, the House of Bishops recognised that there have been some welcome signs of improvement in the current situation, including a reduction in new cases and hospital admissions giving evidence for hope.

While church buildings remain closed for public worship, **in line with Government advice**,

This is, at best, **disingenuous** (and some might say simply **not true!**) since the Government legislation is clear: ¹ The Statutory Instrument issued on March 26th, paragraph 5.(6) “*A place of worship may be used (a) for funerals, (b) to broadcast an act of worship, whether over the internet or as part of a radio or television broadcast, or (c) to provide essential voluntary services or urgent public support services*”. This **Government provision** is still valid at the time of writing (“Changes to legislation: There are currently no known outstanding effects for the The Health Protection (Coronavirus, Restrictions) (England) Regulations 2020, Section 5”), and it contrasts with the instructions issued on the same day by the Church,² and by the Archbishops’ Third Letter a day later (27/3/20) which made it clear that they were actually going **beyond the Government’s regulations**:³

. . . the Bishops agreed in principle to a phased approach to lifting restrictions, in time and **in parallel with the Government’s approach**, . . .

Since the (arch)bishops had gone beyond the Government regulations and Statutory Instrument, the claim to be “in parallel with the Government’s approach” as they look to lifting restrictions is also **disingenuous**, but it is at least an attempt to get the Church out of the mess which was happening before Easter (not to mention the uncanonical breach of the Book of Common Prayer’s clear **instructions** for daily worship and regular services in the church building)

¹ <https://www.legislation.gov.uk/ukxi/2020/350/contents/made> : Statutory Instrument: [The Health Protection \(Coronavirus, Restrictions\) \(England\) Regulations 2020](#). Pdf available as “ukxi_20200350_en.pdf”

² <https://www.churchofengland.org/life-events/funerals/funeral-and-bereavement-resources-ministers> with the downloadable pdf “COVID-19 Funerals 26 03 20 during the COVID-19 Outbreak.pdf”

³ Letter 3 Mar 27 from Archbishops and bishops 20200327.pdf

presumably as a response to the public outcry and the demands of MPs to have the churches reopen⁴ – and as such, it is to be welcomed.

... with three broad stages as infection levels improve:

1. An initial immediate phase allowing very limited **access to church buildings for activities such as streaming of services** . . .

This has always been allowed by the **Statutory Instrument**, paragraph 5.(6) “A place of worship may be used (a) for funerals, (b) to broadcast an act of worship, whether over the internet or as part of a radio or television broadcast” – so the (arch)bishops’ permission is not needed for something which government legislation had previously explicitly provided for.

... or **private prayer by clergy** in their own parishes, . . .

This is and has always been a canonical and legal requirement for the parochial clergy according to the **Book of Common Prayer**: “the Curate that ministereth in every Parish-Church or Chapel. . . shall say the same [i.e. Morning and Evening Prayer] in the Parish-Church or Chapel where he ministereth, and shall cause a Bell to be tolled thereunto . . . that the people may come to hear God’s Word and to pray with him.” So it has been hard to see any legal or canonical reason why this command of the BCP should have been considered not necessary – and no reason why it cannot continue.

... so long as the necessary hygiene and social distancing precautions are taken

Despite Cranmer’s optimism about the people coming “to hear God’s Word and to pray with him”, surely the CofE has made ‘social distancing’ several pews apart from one another into an art form over centuries?!!

2. Subsequently access for some **rites and ceremonies when allowed by law**, observing appropriate physical distancing and hygiene precautions . . .

Funerals have always been explicitly “**allowed by law**” in the **Government provision** “5.(6) (a) for funerals” in places of worship issued on March 26th but still valid at the time of writing, even though the Archbishops’ Third Letter a day later (27/3/20) admitted and made clear that they were actually going

⁴ <https://www.bbc.co.uk/news/amp/uk-politics-52539344?fbclid=IwAR0utEzwQGbiRihg9OTh3NbObXv0L7WRQVJ6ZtcOnYRrkdT2p5tqIRLQDFs>; https://www.theguardian.com/politics/2020/may/05/tory-mps-call-for-funerals-to-be-held-inside-churches-again?fbclid=IwAR3RGoEIQ_wyd81mO26VbTVJmRmNChqIMBDbkY3dnTjtUVF7qssRwj2M6ic

*beyond the Government's regulations: "The government **guidelines** also continue to assert that funerals can take place in church buildings."*

Equally, the same **Government provision** also allowed in "5.(6) A place of worship may be used . . . (c) to provide **essential voluntary services** or urgent public support services (including the provision of food banks or other support for the homeless or vulnerable people, blood donation sessions or support in an emergency). Since Morning and Evening Prayer are required as "**essential**" by the Book of Common Prayer, but only "**voluntary**" for the people who "may come to hear God's Word and to pray with him", it was not necessary to for these "services" to be explicitly mentioned in the list, since they would be taken for granted for a church obeying the *Book of Common Prayer*, which is why other 'services' have to be listed as "**including**".

3. Worship services with limited congregations meeting, when Government restrictions are eased to allow this

We clearly all look forward to when this happens.

The Bishops agreed that the decision on the timing of when to implement the revised advice on ministers or worship leaders praying and streaming from their church buildings should be made by **individual Diocesan Bishops, depending on their local situation**. . . .

So having imposed the lock down on the churches nationally, they are now permitting "**individual Diocesan Bishops, depending on their local situation**" to allow what should never have been restricted in the first place according to both the *Book of Common Prayer* and the Government legislation – so let us hope that many Diocesan bishops act in accordance with this as soon as possible.

The Bishops were clear **once again that this is guidance – not an instruction or law** – and that it will be constantly reviewed depending on the national situation.

This would be hilarious if it were not so **disingenuous** – and this time, given its attempt to re-write what has happened, one might go so far as to say **deceitful**? The Archbishops' first letter (10th March) did use the word "**guidance**" but said that "that all priests **should**", which certainly sounds like an "**instruction**", with the subjunctive "should" conveying the imperative mood linguistically. Their second letter was more explicit: "Our church buildings **must** now be closed not only for public worship, but for private prayer as well and this includes the priest or lay person offering prayer in church on their own. . . . We **must** take a lead". "**Must**" can only be an imperative command – and to make it totally clear that this is an instruction, they said "It is also **imperative**", before concluding in a glorious hotchpotch that "In summary, these are the **guidelines** we **must** all now follow"; if we "**must** all follow" them, they are **instructions**, not "**guidelines**"!

The third letter from the Archbishops is equally confused between the imperative and the advisory, since they “reiterate the **advice** we have already sent” and “**call upon all our churches and church leaders, clergy and lay, to follow this advice**” [their bold emphasis this time]. The description that “The decision to close the church buildings and to prevent them being used for streaming” is clearly imperative and directive and an instruction.

However, in a remarkable sleight of hand, their letter turns the government’s **legal regulations** in the Statutory Instrument into “advice” and “guidelines”, “Some government **advice** suggests that we should be able to allow streaming from church buildings. . . The government **guidelines** also continue to assert that funerals can take place in church buildings” while these supposed “guidelines” are actually the **law of the land**. However, apparently the archbishops want to go beyond the law: “Our advice, however, is that we **should** go the extra mile . . . **stay** at home and to **stay** safe” – note the subjunctive “should” conveying the imperative mood again, reflected in the repeated imperative commands “stay”.

When **Andrew Marr on Easter Day on the BBC**, after pointing out that the Archbishop of Canterbury had celebrated the eucharist from his kitchen at Lambeth Palace with his toaster on view behind him (when he has two perfectly excellent chapels in the same building with much easier access than the kitchen!), challenged **Archbishop Justin** about this confusion, he responded: “*The answer to that is we have **given guidance, not instruction***”.⁵

If the (arch)bishops and the leadership/hierarchy of the Church of England do not understand the difference between **law, command, instruction and the imperative** on the one hand, and **advice or guidelines** on the other, then we really are in either George Orwell’s *Brave New World* of 1984 where “the Ministry of Peace concerns itself with war, the Ministry of Truth with lies, the Ministry of Love with torture and the Ministry of Plenty with starvation; these contradictions are not accidental, nor do they result from ordinary hypocrisy: they are deliberate exercises in doublethink”,⁶ or Humpty Dumpty’s *Looking Glass* world where “When I use a word,” Humpty Dumpty said, in rather a scornful tone, “it means just what I choose it to mean—neither more nor less.” “The question is,” said Alice, “whether you *can* make words mean so many different things.” “The question is,” said Humpty Dumpty, “which is to be master—that’s all.”⁷ Clearly, like Big Brother and Humpty Dumpty, the purpose of these mixed messages “is to be master—that’s all”!

This is reinforced by the experiences of some clergy who have been advocating opening their churches receiving **warning letters** from Archdeacons, and others have even been threatened with **CDMs**

⁵ <https://www.churchtimes.co.uk/articles/2020/17-april/news/uk/we-have-given-guidance-not-instruction-says-welby-on-andrew-marr-show>

⁶ George Orwell, *Brave New World*, Part II, Chapter IX

⁷ Lewis Carroll (a.k.a. Charles L. Dodgson), *Through the Looking-Glass*, chapter 6, p. 205 (1934). First published in 1872.

National Church of England **guidance** will be updated in the coming days with further **advice** on how the staged process could be implemented and with factors and **information** for dioceses to consider.

Let us hope that “**individual Diocesan Bishops, depending on their local situation**” will get on and make their “**decision**” on the timing of when to implement the revised **advice** on ministers or worship leaders praying and streaming from their church buildings” as soon as possible, in line with the Government’s Statutory Instrument and the clear instruction of the rubrics of the *Book of Common Prayer!*

Bishop Sarah said: “We are hugely grateful for all that our churches and clergy have been doing to support the Government’s message to stay at home, to support the NHS, and to save lives. “While it is clear there will be no imminent **return to normality**, . . .

We need an immediate “return to normality” in our use of the *English language*, and our respect for *Government Regulations in Statutory Instruments* and obedience to the *instructions* (not ‘guidance’!) of the *Book of Common Prayer?*

. . . the emphasis is now turning towards how and when aspects of social distancing can be eased, although we remain mindful of the potential risks of a second wave of the virus. “Nevertheless, it now makes sense for us to start to look ahead to the potential easing of restrictions so that our clergy and churches can be prepared.”

I very much look forward to the churches being once again centres of prayer and worship.

The Rev’d Canon Professor Richard A. Burrige

5th May 2020