

**Facts on the situation re: Independent Safeguarding Board of the Church of England
Maggie Atkinson, inaugural ISB Chair, September 2021 to March 30th 2023**

This document refutes persistent misrepresentation bordering on defamation, threats to my professional reputation & personal wellbeing, through the publication and promotion of false or partial accounts by Jasvinder Sanghera (JS) and Steve Reeves (SR.) Both are fellow former members of the Church of England's (C of E's) Independent Safeguarding Board (ISB,) whose founding Chair I was from Autumn 2021, until my resignation the reasons for which were known to both JS and SR, at the end of March 2023.

In 2021 General Synod approved a Policy Paper that set out a 2-stage process for the creation of an independent oversight body on safeguarding in the C of E. The ISB's creation in large part arose from the C of E's bruising and difficult experience of IICSA. However it was also intended as a response to safeguarding cases and scandals being dealt with then, as now, by the C of E.

ISB Phase 1 was explicitly labelled in the Policy Paper agreed by Synod, as an INTERIM body. It would run until the secure establishment of a new, probably larger, certainly more robustly independent Phase 2 ISB, timetabled to launch in early 2024.

Phase 1 had three members, all appointed through a publicly advertised process, concluding with a rigorous interview by a panel led by safeguarding experts independent of the C of E. The panel also included several survivors of abuse and/or exploitation in faith settings.

In summary, ISB Phase 1's remit was to:

- Ensure the central, meaningful involvement of survivors, their advocates, and collective or representative bodies;
- Set up the Board including provision of IT, information handling, finances, ways of working for maximum impact, and setting up a very small staff team;
- Supervise and quality assure the work of but not line manage the NST's Director, and through her/him the NST;
- Contribute to the C of E's Safeguarding Programme Board, at the time in its infancy;
- Establish an independent presence in "the public square": an independent website, recognisable "brand" and house style, and strong and unfettered communications;
- Challenge when C of E safeguarding policy or implementation were found wanting;
- On rare occasions, re-review a case where conclusions from other bodies' work were judged incomplete or unsatisfactory, and
- Work alongside, challenge, continuously inform and help shape and improve safeguarding by Synod, the AC, the HoB and CoB, NCIs, NSSG, NSP, Dioceses and other C of E bodies, focusing on the expansion and improvement of the safeguarding curriculum, culture and practice across the C of E. This part of the ISB's work was to include the capturing, dissemination and celebration of good safeguarding practice, of which - as many

survivors and advocates said then and have gone on saying - there is a great deal underway, in parishes dioceses and schools across the country.

We were further charged, across 2022 and 2023, with setting out for debate, eventual agreement and implementation, what a Phase 2 ISB might come to look like, working in collaboration with all the bodies set out above.

We wrote our own Terms of Reference. As a matter of both protocol and pragmatism these were aligned to the Policy Paper Synod had approved in establishing the ISB. Though the bodies listed under the final bullet point above could note them, they were ours in their entirety and could not be approved, owned, edited or changed by them.

We were contacted in our earliest days by numbers of those whose safeguarding experiences with the C of E had been negative and damaging, many still left feeling without resolution. We connected with as many of them as possible, the Survivor Advocate taking the lead and during that period researching for and then creating the ISB's first published report, issued in late 2022. We were clear with all concerned that expectation management must be brought to bear, given our remit was not directive and we had no power to sanction others.

As a Board or as individual members we engaged with members, and spoke at sessions, of Synod, the House and College of Bishops, the Archbishops' Council, the NSSG and NSP, gatherings of DSAs (now DSOs) and DSAP Chairs. We were beginning to lead discussions on ISB Phase 2, not least in a Fringe and a main session at Synod in July 2022.

All this work was ongoing when I was stepped aside in August 2022 by the AC, following GDPR and Data Protection Act errors by me for which I was and remain deeply sorry. These issues concerned my having contacted the Director at the NST to enquire about what had already been done on 2 cases, given the ISB could not do its work fully or with confidence without such discussions. The survivors concerned objected, and reported me to the Information Commissioner's Office (ICO). I was found personally wanting on one. The ICO issued general advice on policy, procedures, public notices and notifications on what the ISB would do with data. The case on whose basis I was stepped aside in August 2022 was then closed by the ICO in Autumn 2022, on the basis of there being insufficient evidence for an investigation.

In the Winter of 2022-2023, throughout 2023 to the present time, I have experienced a series of particularly challenging family circumstances. In March this year they, combined with continued refusal by JS and SR to resolve matters or agree a workable way forward for the ISB, combined to lead to my resignation. Put frankly, I did not have the capacity to continue to try to resolve ISB matters in the face of refusals to engage, coupled with both implied and direct personal and professional attacks on me. I resigned on a pragmatic basis, not least to ensure my physical and emotional health. Contrary to portrayals both by JS and SR and others in a variety of settings, I did not resign because of ICO complaints, which had been closed.

JS & SR published a "rebuttal" report against the C of E on 05 July 2023. It was issued at the end of the brief notice period set by the commissioning body for their services - and during my work as Chair mine - the Archbishops' Council (AC.) That notice, terminating their contracts

as two individual independent contractors working as ISB members, was both served and made public on 21 June 2023.

The 05 July rebuttal report contains untrue material about and negatively, judgementally and explicitly names, me. This is unacceptable, not least because the interpretations in the text are at best biased and partial and at worst damaging.

Details/background on a number of specific issues are as follows.

Readers should note that, throughout the 11 months since I was stepped aside, and despite the right being mine, I have not exercised a right of reply to what has either been explicitly said or written, or negatively hinted, about me. I have been maligned in a range of settings including social media and in documents by JS and SR, including some that have gone to the AC and other bodies in the C of E. In addition, I reflect here that I have become both sufficiently nervous of stepping into an environment dominated by deeply unpleasant attacks aimed at me which would no doubt have been redoubled had I spoken out, and sufficiently exhausted by family matters, that I have remained silent in public despite sometimes severe, certainly hurtful provocation.

Those who know me well also know I am not easily cowed. I have become so during 2023, though only in this setting. That my reputation in some circles will forever be overshadowed on the basis of continued false representation hurts and offends me, both as a professional and as an individual.

The 05 July 2023 report challenging the AC's report to Synod claims that JS and SR as ISB members required me to step back from my Chair role in August 2022. Their claim of agency in this matter is inaccurate. The only body able to direct that I stepped aside was the commissioning body for my own and their consultancy services: the AC. JS's and SR's portrayal of themselves as having that power is false, though it is true that they pushed for me to step aside at the time, first directly and confrontationally with me, and then without reference to me and in the midst of a busy Lambeth Conference, with the Archbishops and the then-lead Safeguarding Bishop. They later constructed, entirely *ultra vires*, ISB Standing Orders that would have made possible their insistence on my stepping down permanently.

My stepping aside in August 2022 was actioned due to data protection concerns. I have acknowledged any errors and apologised for them sincerely, both then and in the time that has passed since. The Information Commissioner's Office (ICO) concluded in early Autumn 2022 that as regards two adult survivors whose cases are outlined above, it was issuing "General Advice" on improving practice, protocols, and data protection by the ISB, and that all members should be duly trained and certificated. I paid for my own training and certification whilst stepped aside.

In early November 2022, after reviewing copious evidence from a range of contributors, the ICO wrote to me to confirm that on the specific issue which led to my being stepped aside, it had decided during September to close the case. It did so both "on the basis of insufficient

evidence to support an investigation" and a suspicion of at least one false identity being used, effectively nullifying the notion of sharing having taken place. I had expressed that suspicion to JS, SR, the AC and the ICO, backed by witnesses with similar experiences. None of those bodies called out those under suspicion. Had they done so we might be in a different position.

The ICO was explicit there was no reason for me to stay away from my role. The DG at the AC was copied into that letter. Whether or not the ICO sent him a copy, given it was mine to share, I forwarded it. On its basis, access to my ICT account was reinstated. The 05 July report makes much of the potential data risk JS and SR claimed I still posed as the basis for their seeking to block both that access and my reinstatement. The UK's statutory data protection regulator stating they had no grounds was then, and until their contracts were ended continued to be, ignored. The Church Times (CT) continues to include comments on these matters whenever it covers the ISB. My reputation thereby continues to be besmirched on false bases, including in the media. This is harmful to me, my wellbeing having been ignored. I would observe that so are the reputation and wellbeing of the now departing interim Chair, with whom the two other former members refused to engage since March 2023 - as the AC's paper to the July 20223 Session of Synod made clear. Their breach of contracts in refusing to work with the interim Chair is not an invented matter, as some commentators claim. It is a matter of a legally binding contract being breached, as was their refusal to work with me after I began to try to resolve matters in Autumn 2022.

In February 2023 I was informed by a journalist at the CT that JS had approached her, with information in documentation I seriously doubt she was empowered to share, and informed her an ICO complaint against me remained. The ICO said otherwise. It would not communicate with me on the matter – I surmise the second adult survivor being the complainant against my questioning the NST on the matters he raised - because the ISB was named, whilst as an individual once connected to it I was not. I appealed against the ICO's refusal to engage with me and asked to see what the complaint contained. My appeal was refused. This ICO-led process, and my account of it, were not believed by JS, SR, or the CT journalist, whose copy to this day continues to link me with ICO matters that are closed. The two former ISB members have continued to besmirch me, both by inference and in their 05 July 2023 "rebuttal" paper, as have a number of commentators on social media.

In early March 2023, to try yet again to move us forward and resolve matters, I sought full and formal information from the ICO as to where I stood. In a letter, copies of which JS and SR were given by me on 03/03/2023, the ICO confirmed, "We hold no complaints against you." Their letter reiterated the issue of General Advisory notices by the ICO to the ISB, and the closure of the case that led to my being stepped aside, due to insufficient evidence to undertake an investigation, and a suspicion of false identities having been at play. The 05 July JS/SR rebuttal report continued to claim data issues remained the reason for my resignation at the end of March. Both authors know this to be false.

The 05 July report indicates that as I was stepped aside, I insisted on all contact being via legal advisers. They were and have remained aware that this was done on my insurer's lawyers' explicit advice. It is portrayed in their 05 July 2023 report as an idiosyncratic and damaging

choice by me. That is simply untrue. My relaying of that message was infused with my hurt and disappointment, but the distancing was advised by a company that could have revoked my business's cover had I not followed that advice.

When the ICO reported in November 2022 that the case I was stepped aside for was closed, at once I began to seek a meeting between the three of us as Board members seeking to resolve matters, with no C of E presence. I offered many dates and times. I continued to do so repeatedly as dates came and went, from that time throughout the rest of 2022 and into 2023. There was no explicit refusal by them in response. There was in fact no response at all.

I continued to seek that meeting and was met by continued silence. The Director General (DG) at the AC, in touch with all of us on behalf of the contracting body for our services, intervened several times to urge increasingly pointedly that such a meeting should happen. I continued to offer opportunities, my motive to re-start what we all knew we had to do to deliver Phase 1. I offered large tracts of my diary, despite this meaning I lost business opportunities elsewhere. I never received a response during the entire four months of making these attempts either from JS and SR, or the ISB's independent lawyer.

The AC concluded in late February 2023 that all three of us were by then unable, I assume it surmised potentially unwilling, to fulfil the clauses in our contracts that stated we must work together as Board members. We were all therefore deemed in breach of our contracts. Contrary to the impression given by JS and SR in their 05 July paper that they were the two people sent Notes of Dispute, we each received one. Members' and Chair's contracts being slightly different, I assume - though I have not seen - that the Notes of Dispute were tailored to each of us in accordance with those contracts.

I contended then, continued to contend when I made the decision to resign, and have contended in the months since I took that closing action, that my not fulfilling my contract was created firstly by my being stepped aside and locked out, and secondly by JS's & SR's steadfast and silent refusal to meet to resolve matters. Their portrayal of what took place in their 05 July paper is partial, biased, and deeply prejudiced against me. I cannot of course comment on the nature of what took place between them and the AC, NCIs or others since August last year, having been made absent from my role.

The DG called all of us to a meeting at Church house on 03 March 2023. It was chaired by him, as is spelled out as the first stage in the Dispute Resolution process in all our contracts. He was explicit that he would chair so as to try to help us resolve the Dispute on which the AC's Note was issued, without the necessity of escalating matters or seeking next-stage external mediation. Despite his strenuous efforts, the 5-hour meeting confirmed a continued refusal by JS and SR to resolve matters. Its content largely rested on an intensely personal and sustained attack on me. We were all made aware as we closed that there was still business to conclude. We were also told that the AC at its meeting on 20 March 2023 would take as business both all that had transpired, and all we had put forward in response to the Note of Dispute. What was not made clear to me at that point was that JS and SR would also be given

the opportunity to address the AC at that meeting, with no equal place or audience given, and no duty of care offered, to me.

By this time in the Spring of 2023 the issues I was carrying across the span of my family were increasingly complex and heavy. It was clear that despite my having held out many genuinely calm and open offers for us to meet and resolve matters, neither JS nor SR were prepared to work towards a resolution and the continuation of the vital work of Phase 1 both within the crucial survivor space, and in the far wider church as set out in the Policy paper agreed by Synod in 2021. The 03 March meeting solidified that understanding for me.

Before a further meeting, which had been planned for later in March, I consulted my family and wrote a resignation statement, which I then handed to the DG personally in the 1-1 meeting with him on 21 March 2023 which replaced that planned follow-up meeting. My resignation, made public in late March, is characterised in JS's and SR's published and widely read report of 05 July 2023 as a vindication of their position, a just end to my time with the ISB, and still related to ICO issues they already knew had been resolved. The report is a – one must assume deliberately - false representation of the facts. They have since compounded their behaviours by refusing to work with not only a first substantive but now a second, expert, and explicitly interim Chair.

They appear to have taken it upon themselves, though only in the survivor space it seems, to “BE” the Phase 2 ISB that has not yet been devised.

Phase 2 will in any event be the whole C of E's to own, and Synod's to agree. Meanwhile, the Phase 1 ISB remit covering work with dioceses, parishes, DSOs and others, the positive professional supervision of how well the NST does its work, and the oversight of a safeguarding curriculum and culture with which we were charged, remain largely unfulfilled. Synod's adopted ISB policy from 2021 largely therefore sits in suspended animation, and has not been replaced by other action or the delivery of outcomes.

Coda

Before I was stepped aside the ISB led on, and I gave the AC's DG and the Policy lead whose paper led to the ISB's formation, the development of discussion materials on possible models for the formation of an ISB Phase 2. There is no sign this work has yet gone anywhere, only five months ahead of the hoped for launch of Phase 2 in early 2024.

The advice I gave on this before I was stepped aside, captured what the Fringe and main Synod session in July 2022 had to say. It also reflects on the C of E's need to join the rest of us who work in the civic society safeguarding world, where the necessary wheels have already been invented and are turning.

Public bodies in all English localities work together to secure, promote, champion and where necessary learn from failure in and pledge to improve safeguarding for both children and

adults. They are co-funded by their respective organisations, but when they meet in the Partnerships concerned are not bound by those organisations to defend a party line or pursue that organisation's policy positions. They are chaired and scrutinised by independent individuals who ensure both the necessary holding to account, and no interference in the work done or the strategies implemented. They are inspected and regulated to ensure they are fulfilling their purpose and keeping populations as safe as possible.

When there is a local area failure in safety, protection or wellbeing, these are the bodies that expose, investigate and report on it, and that hold all partner bodies to account for changing both practice and outcomes alike. They work in the full glare of the public gaze. They cannot be directed by any partner body, and there is a statutory duty to cooperate that keeps even reluctant bodies involved and at the table, even when discussions and “callings-out” are hard to bear. The C of E could – I would advise should – adopt a pattern of this nature if Phase 2 is to hold water, as I know all concerned hope it is going to do.

The July 9th suspension of a vital session of Synod to permit speeches by JS and SR, accompanied by a good deal of ridiculous behaviour and noise as witnessed on the TV coverage, turned a serious and vital session of the C of E's legislative body into a farce resembling a political Party or Trade Union rally. Quite who it satisfied, and given Synod was not in session but suspended for an “informal” short period quite what it could seek to achieve, remain mysteries. Good theatre, but to what end? The un-Christian treatment of Meg Munn that afternoon, had it been meted out to me, would have made me do as she did: walk out. That she has now walked not only out, but away, sad as it is and dismaying as it will be to many, is richly deserved.