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# Archdeacons and the Law

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*Previous studies of archdeacons in this Journal defended their pastoral hearts in a ministry dominated by law. This article sees the archdeacon's pastoral and priestly ministry as created and enabled by law. It looks at the canonical description of the archdeacon's office before turning to the work of an archdeacon in such areas as visitations, parish and diocesan governance, faculty jurisdiction, care and discipline of clergy, conflict resolution and creative innovation. The article draws on relevant legislative instruments, including Acts, Measures and Codes of Practice; on case law; and on quasi-legislation such as diocesan handbooks. Its conclusions are based not only upon what is set down in these, but also upon what archdeacons actually do. Archdeacons across the Church of England and the Church in Wales, and a Channel Islands dean, responded to a short survey looking at archdeacons' work in relation to the stipulations of the law. The article concludes that archdeacons occupy a pivotal position in dioceses, both because of what the law requires and because of what it does not prohibit. They play a key role in shaping the church and its ministry. With bishops and others, they delight in its beauty and rejoice in its well-being.*

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Archdeacons combine characteristics of two much-excoriated New Testament figures: the priests and the lawyers. Since the days when their salvation was a matter of learned debate, they have glowed in an ardour of something less than sanctity.<sup>2</sup> The monikers they acquire ('Rottweiler', 'archdemon') reflect a hard-nosed, unpopular, approach.<sup>3</sup> In dioceses both factual and fictional, archdeacons' reputation is varied, with a historical reputation for chicanery offsetting a contemporary one as a fixer.<sup>4</sup>

1 This article is based on research carried out as part of the LLM in Canon Law at Cardiff University. Information on particular diocesan practice has been gathered from the archdeacons of the Church of England and the Church in Wales and the Dean of Guernsey, to all of whom I am very grateful. Earlier research into the archdeacons' tasks can be found in P Brierley, 'Archdeacons in the early 21st century' (2004), available from [admin@christian-research.org.uk](mailto:admin@christian-research.org.uk). Brierley summarises the results of a survey of 2003.

2 For the chicanery behind the medieval question of whether an archdeacon could be saved, see, briefly, R McKinley, *A History of British Surnames* (London and New York, 2013), p 136.

3 See, for example, 'Dick the Knife' (for the late Venerable Richard Ninis), *The Telegraph*, obituary, 24 November 2014 <<http://www.telegraph.co.uk/news/obituaries/11250529/The-Venerable-Richard-Ninis-obituary.html>>, accessed 22 January 2018. P James, *Death in Holy Orders* (London, 2001), p 200, describes archdeacons as 'a kind of Rottweiler of the Church'.

4 Fictional archdeacons include: Archdeacon Grantly throughout Trollope's *Chronicles of Barset*; Archdeacons Castleton and Craggs in C Alington, *Archdeacons Afloat* (London, 1946) and

These characteristics were acknowledged and, to some extent, challenged, in articles published in this *Journal* in the 1990s. T Hughie Jones argued for a ‘real pastoral dimension’ to the role of archdeacon, ‘which in popular perception such a role seems to preclude’.<sup>5</sup> R L Ravenscroft cautioned against undermining ‘the gravity’ of what archdeacons do ‘because of a libertarian stance about rules and regulations’, but also emphasised a pastoral approach: ‘the archdeacon does not want to be seen as an authoritarian figure’.<sup>6</sup> Nevertheless, a sense of caution has persisted. In 1997, the *Church Times* carried a cartoon after 80 of a possible 102 archdeacons had attended a training conference: ‘What bothers me’, said one parson to another, ‘is what the other twenty-two were doing!’<sup>7</sup>

More than twenty years on, it is timely to review this picture. The 1990s articles discussed above looked at the work of an archdeacon in relation to the law as it stood then. Yet the law has changed, even if, as the BBC TV series *Rev* suggests, the popular reputation of archdeacons has not.<sup>8</sup> This article therefore looks at the office and work of archdeacons in the light of current law, noting both what is required by law and additional tasks which accrue to those who hold this office. It offers some alternative ways to describe archdeacons, both to those given in earlier articles and to popular perception.

## THE OFFICE OF ARCHDEACON

It is a requirement of primary legislation and of canon law that archdeacons are priests:<sup>9</sup> ‘no person shall be capable of receiving the appointment of archdeacon’ without having completed six years in holy orders and being in priests’ orders at the time of appointment.<sup>10</sup> As priests, archdeacons make the declaration of assent and take the oaths of canonical obedience and allegiance as set out in

*Archdeacons Ashore* (London, 1947); and Archdeacon Crampton in P James, *Death in Holy Orders* (London, 2001).

5 H Jones, ‘Omnis gallia, or the roles of the archdeacon’, (1991) 2:9 *Ecc LJ* 236–240 at 238.

6 R Ravenscroft, ‘The role of the archdeacon today’, (1995) 17:3 *Ecc LJ* 379–392 at 388.

7 Quoted in H Buckingham, ‘The training of archdeacons’, (1997) 4:21 *Ecc LJ* 738–743.

8 As shown through the person of Archdeacon Robert. Episodes of the series are available at <<http://www.bbc.co.uk/programmes/bo178fhq>>, accessed 7 October 2018.

9 Ecclesiastical Commissioners Act 1840, s 27. This contrasts with earlier historic practice. The Canons of Westminster 1102, for example, emphasise that archdeacons are ‘deacons’; they are not priests. See G Evans, ‘Lanfranc, Anselm and a new consciousness of canon law in England’ in N Doe (ed), *English Canon Law* (Cardiff, 1998), pp 1–12 at p 8.

10 Canon C 22(1). Archdeacons may also be in episcopal orders as is the current Bishop and Archdeacon of Ludlow.

Canons C 13, C 14 and C 15. Their office pertains to a particular geographical area.<sup>11</sup> They are stipended.<sup>12</sup>

Canon law confers ordinary jurisdiction on archdeacons within their archdeaconries. This is exercised personally unless formally committed to a commissary, usually the rural dean.<sup>13</sup> Where, however, the archdeacon is acting as a commissary of the bishop, it is the bishop who must assign functions to an alternate.<sup>14</sup> The archdeacon ministers under the bishop, assisting in the episcopal 'pastoral care and office'.<sup>15</sup> Within the archdeaconry, the archdeacon 'shall see that all such as hold any ecclesiastical office . . . perform their duties with diligence' and shall draw to the bishop's attention 'what calls for correction or merits praise'.<sup>16</sup> Canon C 22 requires 'yearly visitations' which enable the archdeacon to establish what might be laudable or deplorable in the parishes. These are set aside only when the archdeacon 'is inhibited by a superior Ordinary', as, for example, in the event of an episcopal visitation.

Canonical regulation of the archdeacon's office thus orientates archdeacons towards the bishop of the diocese and the parishes of the archdeaconry. As the law sets out in more detail the duties which accrue to this office, it reprises the importance of its broad diocesan perspective and its interstitial vantage.

## THE WORK OF ARCHDEACONS

### Visitations

Canons G 5 and G 6 supplement and clarify the regular visitational duty of Canon C 22. Canon G 5 confers a right of special visitation 'for the well-governing of Christ's flock' and in order that 'means may be taken thereby for the supply of such things as are lacking and the correction of such things as are amiss'.<sup>17</sup> During these special visitations 'the jurisdiction of all inferior Ordinaries shall be suspended' unless the law exempts. Canon G 6 requires

11 Elsewhere in the Anglican Communion, for example in Nigeria, the title normally associated with the office of archdeacon, 'the Venerable', is also used as an honorific without territorial office. In recent years, English dioceses have appointed archdeacons whose ministry extends more broadly than their obvious archdeaconries. The Diocese of Coventry, for example, has two archdeacons but both work across the entire diocese, one being the Archdeacon Missioner and the other the Archdeacon Pastor.

12 This has not always been so. Archdeacons have historically also held parochial appointments, and may still do so, if they are to receive the temporal benefits of office. See A Trollope, *Clergymen of the Church of England* (London, 2010; first published 1866), p 45: 'An archdeacon . . . has a great deal to do and very little to get. Indeed, as to that matter of getting, the archdeacon, – as archdeacon, – may be said to get almost nothing.' The Archdeacon of Llandaff (Church in Wales) is also priest-in-charge of St Fagans and St Michaelston-super-Ely.

13 Canon C 22(2), C 22(3); in some dioceses, 'area dean'.

14 Church of England Miscellaneous Provisions Measure 1983, s 9.

15 Canon C 22(4).

16 Ibid.

17 Archbishops and bishops also have this power under Canon G 5.

the archdeacon to deliver articles of inquiry in advance of visitations so that the minister and churchwardens may know what to present. Material submitted to the archdeacon need not be regarded as confidential.<sup>18</sup> Mark Hill has drawn attention to the quasi-judicial character of archdeacons' visitations since their courts fell into desuetude.<sup>19</sup> Such an aspect does not preclude pastoral and missional matters being topics of concern for the visiting archdeacon, although in practice these may more usually feature in regular visitations or on other parochial engagements.

### Parochial governance

The law on the archdeacon's role in parish governance is principally set out in the Church Representation Rules.<sup>20</sup> These confer powers designed to address problems in parish life, often conflictual in nature. The Rules may lead to more direct involvement in the parish than is usual in the day-to-day round of archidiaconal duties. They permit, for example, the archdeacon to convene an extraordinary meeting of the parochial church council (PCC) while stopping short of special visitation.<sup>21</sup> Archdeacons do not need the authority of a PCC to see its approved minutes, and may give another person authority to see them, such as the rural dean.<sup>22</sup>

These formal powers are supplemented when the archdeacon takes on roles created by law but not mandated to archdeacons. Archdeacons may chair annual parochial church meetings as a chair 'chosen by the annual meeting' in the absence of both an incumbent and a lay vice-chair.<sup>23</sup> Extraordinarily, often to resolve difficulty, they may be licensed as priest-in-charge of a vacant parish in their archdeaconries.<sup>24</sup> As the parish prepares to play its part in the appointment of a new incumbent, 'in practice' the archdeacon 'is usually actively involved in guiding parishes through the appointments procedure'.<sup>25</sup> The possible conflict of interest against which archdeacons must guard in these and other circumstances is discussed further below.

18 *Legal Opinions Concerning the Church of England* (eighth edition, London, 2007), p 93.

19 M Hill, *Ecclesiastical Law* (fourth edition, Oxford, 2018), para 4.59.

20 Church Representation Rules (London, 2017). The Rules as originally enacted constitute Schedule 1 of the Synodical Government Measure 1969 and have been repeatedly amended. In July 2018, the General Synod gave final approval to their complete revision and they now stand committed to the Steering Committee in respect of their final drafting.

21 Rule 23(1).

22 Church Representation Rules, Appendix II, Rule [13] (12)(e). The reference should be to Rule 15 rather than 13; this error is noted in the text.

23 Rule 8(1).

24 For example, the Archdeacon of Lambeth (Diocese of Southwark) is currently also priest-in-charge of the parish of St Margaret the Queen, Streatham, in the Lambeth archdeaconry.

25 'Legal responsibilities of an archdeacon', available at <<https://www.churchofengland.org/sites/default/files/2017-11/Statutory%20Duties%20of%20an%20Archdeacon.pdf>>, accessed 31 August 2018.

### Diocesan governance

While archdeacons often become involved in parochial governance at times of difficulty or transition, their presence in diocesan governance is normative. The statutory governance bodies of a diocese include the diocesan board of finance (DBF), the diocesan synod, and the bishop's council and standing committee.<sup>26</sup> Dioceses may also have a parsonages board or, if they do not, must ensure that such a board's responsibilities are fulfilled by a committee or committees of the DBF.<sup>27</sup> Since 2011, each diocese must have a diocesan mission and pastoral committee (DMPC).<sup>28</sup> Dioceses also have diocesan boards of patronage and cathedrals. The Cathedrals Measure 1999 includes archdeacons as members of the college of canons.<sup>29</sup> The local law of cathedrals (their constitutions and statutes drawn up under the Cathedrals Measure 1999) may contain additional regulation concerning archdeacons, although this tends to cover such details as archdeacons' place in liturgical processions rather than cathedral governance.<sup>30</sup>

The law and current practice combine to give archdeacons both work to do and the authority with which to do it. Archdeacons, however, accrue authority from several separate pieces of legislation, such that the extent of their role is greater than that envisaged by any one legislative instrument, even without regard for the extra responsibilities with which they are involved. The Church Representation Rules and diocesan practice both accentuate this point. Membership of the bishop's council and standing committee of the diocesan synod is determined at diocesan level, but the archdeacons are members of the bishop's council or its equivalent in all 41 mainland dioceses of the Church of England.<sup>31</sup> The bishop's council and standing committee may transact the business of the diocesan synod<sup>32</sup> and the Church Representation Rules place

26 Diocesan Boards of Finance Measure 1925; Synodical Government Measure 1969; Repair of Benefice Buildings Measure 1972.

27 Boards are established by scheme. If the diocesan scheme designates the board of finance, the scheme 'shall provide for the delegation of the Board's functions under this Measure to a committee or committees of the Board constituted in accordance with the scheme, and regard shall be had in prescribing the membership of the committee or committees'. Repair of Benefice Buildings Measure 1972, s 1(9)(a).

28 Mission and Pastoral Measure 2011, s 2.

29 The college 'shall perform the functions conferred by the Appointment of Bishops Act 1533 on the dean and chapter'. The college also receives and considers the annual report and audited accounts, discusses any matter concerning the cathedral raised by the college and may perform other functions. Cathedrals Measure 1999, s 5.

30 See, for example, the 'Constitution and statutes for Southwark Cathedral 2000, amended 2013', p 26, where the order of procession is specified, and p 9, which accords archdeacons a seat in the chancel; available at <<https://cathedral.southwark.anglican.org/media/1702/cathedral-constitution-and-statutes-2013-final.pdf>>, accessed 22 September 2018.

31 No archdeacon is listed as a member in the Diocese in Europe: see <<https://europe.anglican.org/people/bishops-council>>, accessed 28 September 2018. In Canterbury and York, the council is the archbishop's.

32 Church Representation Rules, Rule 34(1)(k).

archdeacons as *ex officio* members of the diocesan synod.<sup>33</sup> Consequently, archdeacons contribute to diocesan provision for all matters concerning the Church of England, are instrumental in advising the bishop, may opine on issues referred by General Synod, and participate in considerations of diocesan finance.<sup>34</sup>

The archdeacons' influence is augmented by their part in appointments, pastoral reorganisation, the provision of parsonages, and diocesan finance outside the diocesan synod, through bodies of which they may or may not have statutory membership. If the diocesan patronage board is the patron of a vacant parish in the archdeaconry, the archdeacon is a member of the board for that appointment.<sup>35</sup> Archdeacons are also very often involved in any interview process for a new incumbent and in ensuring that the parsonage house is in good order.<sup>36</sup> In some dioceses (such as Canterbury and Ely), the archdeacon leads the appointment process, while in a very few (notably, St Edmundsbury and Ipswich) the archdeacons do not participate in the appointments process.<sup>37</sup> Diocesan property departments carry out and oversee the actual work of parsonage maintenance and preparation but archdeacons are almost always involved in the process, from those dioceses (including Southwark) who visit the house and agree the work, to those (such as Exeter) where the archdeacon will only be drawn in if there are issues to resolve. The Church in Wales has a similar diversity of practice: archdeacons are often involved in appointments and in parsonages, though their parsonages brief varies from visiting the house with the property department to a watching brief to ensure that homes are readied in a timely way.

Archdeacons' work in vacancies complements their *ex officio* membership of the DMPC.<sup>38</sup> The committee's task is to make 'better provision for the cure of souls in the diocese'.<sup>39</sup> Archdeacons may be proactively involved in the committee's duty to 'review arrangements for pastoral supervision and care in the

33 Ibid, Rule 30(4)(a)(iii), stipulates that the archdeacons shall be among the members of the House of Clergy of the Diocesan Synod. Rule 34(1)(k) requires that 'there shall be a bishop's council and standing committee of diocesan synod with such membership as may be provided by standing orders'. Standing orders may well include the archdeacons as members.

34 Synodical Government Measure 1969, s 4(2); Synodical Government (Amendment) Measure 2003, s 1(1).

35 Patronage (Benefices) Measure 1986, s 27.

36 Diocesan, and sometimes episcopal area practice, varies but, in the majority of dioceses, archdeacons are involved in parochial appointments although they have no statutory role in the process as set down by the Patronage (Benefices) Measure 1986, ss 11 and 12.

37 In Peterborough the archdeacon chairs; in Rochester the bishop meets a preferred candidate. This is similar to the arrangement in Guernsey, where the dean leads the appointment process, the bishop offering episcopal care meets the preferred candidate and the dean then nominates to the Crown through the lieutenant governor.

38 Mission and Pastoral Measure 2011, s 2.

39 Ibid, Part 5.

diocese as a whole'.<sup>40</sup> The committee must pay 'due regard to the furtherance of the mission of the Church of England', 'have regard to worship, mission and community as central to the life and work of the Church of England' and 'have regard to the financial implications for the diocese and the Church of England as a whole'.<sup>41</sup> Finance, tradition, pastoral care, mission, community and the worship of God must, then, all be to the fore of the archdeacons' consciousness in mission and pastoral committee work. This is shared with others, including diocesan officers, but archdeacons are pre-eminent in knowing multiple parishes and deaneries, their traditions, their requirements and the communities they serve, and therefore exercise considerable sway within the committee.<sup>42</sup>

The law regards archdeacons as interested parties in relation to pastoral reorganisation.<sup>43</sup> However, many archdeacons chair their own archdeaconry mission and pastoral committees preliminary to the DMPC: this is so in Bath and Wells, Carlisle, Chester, Ely, Exeter, Hereford, Leeds, Leicester, Lincoln, Oxford, Peterborough, Portsmouth, Rochester, Salisbury, Southwark, Truro, Winchester and York. The archdeacon may run the consultation process, writing to parishes about reorganisation on the bishop's behalf. Again, the archdeacon's work is more extensive than that set out in law, in such a way as to increase the weight of the office. The Church of England's guide to the 'Legal responsibilities of an archdeacon' recognises that, 'in practice, the archdeacon is usually actively involved in identifying the need for pastoral reorganisation and initiating discussions with other interested parties'. This, combined with the detailed understanding of parish relationships gained from visitations and close working with the rural dean, adds considerable weight to the archdeacon's view.<sup>44</sup>

Membership of the diocesan parsonages board or, more commonly, the equivalent committee, further extends the archdeacons' part in decision

40 Ibid, s 2(3)(a) and (b): 'It shall be the duty of the mission and pastoral committee (a) to make or assist in making better provision for the cure of souls in the diocese as a whole and, to the extent that the committee thinks appropriate, in particular parts of the diocese or in particular parishes; (b) from time to time, as the bishop may direct, or as the committee thinks fit, to review arrangements for pastoral supervision and care in the diocese as a whole and, to the extent that the committee thinks appropriate, in particular parts of the diocese or in particular parishes (including sharing agreements in respect of a church or parsonage house and any proposals for sharing agreements)'; other provisions follow. Section 3 also gives the committee duties in relation to its own strategic functions and to church buildings, including those listed or in conservation areas. Proposals for parish boundary changes must be submitted by the committee to the bishop of the diocese, whose approval is necessary for a pastoral scheme or order to be made (ibid, ss 6 and 7).

41 Ibid, ss 1, 3(1) and 3(2)(a).

42 See the Mission and Pastoral Measure 2011, Schedule 1, paras 2 and 5, for membership; para 2 enables, but does not require, the bishop to be a member.

43 Mission and Pastoral Measure 2011, s 21(2)(e).

44 'Legal responsibilities of an archdeacon', available at <<https://www.churchofengland.org/sites/default/files/2017-11/Statutory%20Duties%20of%20an%20Archdeacon.pdf>>, accessed 22 September 2018.

concerning the pastoral arrangement of parishes. The Diocese of Southwark appears to be the exception which proves the rule that English dioceses do not have separately constituted parsonages boards but execute the functions by committee; in Southwark, the archdeacons are members of the board.<sup>45</sup> In all but two mainland dioceses, at least one archdeacon is a member of the relevant committee and some chair their own additional archdeaconry committee.<sup>46</sup> Parsonages boards provide not only for the inspection, maintenance and repair of parsonage houses but also for their sale, exchange or demolition.<sup>47</sup> Archdeacons therefore have a significant liaison role in ensuring that all interests are recognised in relation to potentially contested matters such as the redundancy of a parsonage following a union of benefices, as well as exercising a highly leveraged strategic role in shaping diocesan pastoral life.

It is currently common practice for dioceses to streamline their governance functions by combining boards, councils or committees. This arguably increases both the workload and the power of archdeacons. In many dioceses, the bishop's council membership is co-terminus with the DMPC or the DBF or both. The bishop's council and the DMPC share a membership in the dioceses of Bristol, Coventry, Derby, Ely, Gloucester, Lincoln, Norwich, Rochester, Salisbury and Southwell & Nottingham. In the Diocese of Blackburn, the members of the bishop's council are the DBF's board of trustees and so are the company directors in law.<sup>48</sup> In Birmingham and Exeter, which distinguish between members and directors of the DBF, the directors are also the members of the DMPC and the bishop's council; DBF members are the members of diocesan synod.<sup>49</sup> Where local practice makes archdeacons members of the bishop's council and these combined arrangements apply, archdeacons also acquire membership of the DBF, although the 1925 Measure does not so require. In other dioceses, more than one board, council or committee shares membership with the same effect if the DBF is included. The bishop's council comes together with the DBF and the DMPC in the dioceses of Chester, Durham, Leeds, Lichfield, London, Oxford, Portsmouth, St

45 Repair of Benefice Buildings Measure 1972, s 1. Since, however, Southwark brings its parsonages board together with its DBF, DMPC, and bishop's council under the umbrella of the Diocesan Council of Trustees, the archdeacons arguably achieve membership by multiple instruments.

46 The exceptions are Durham and Southwell & Nottingham, although in both cases archdeacons are on the DBF and, in Durham's case, arrangements are being considered. In the Diocese of Europe, parsonage housing is a parish responsibility. Archdeaconry committees exist in Oxford and Salisbury dioceses.

47 Repair of Benefice Buildings Measure 1972, s 5. In the case of the alternate committees of the DBF, the board carries this responsibility – but, as all, one or some archdeacons are involved in the board of finance of every diocese, the substantive point above stands.

48 See <<https://www.blackburn.anglican.org/diocesan-accounts>>, accessed 22 September 2018.

49 Truro has similar arrangements but with a separate DMPC; see <<https://www.trurodiocese.org.uk/wp-content/uploads/2016/04/Section-Y-current-copy.pdf>>, accessed 23 September 2018.



Edmundsbury & Ipswich, Winchester and York.<sup>50</sup> The Diocese of Southwark has similar arrangements to these last, adding its parsonages board and ensuring that, in every meeting, each body has its clear section of the agenda.<sup>51</sup>

In other dioceses, archdeacons are members of the DBF, even where this is neither combined with another governance body nor required by Measure. This is the case in the Dioceses of Bath & Wells, Bristol, Coventry, Derby, Gloucester, Guildford, Leicester, Liverpool, Peterborough, St Albans, Sodor & Man, Southwell & Nottingham and Worcester. In dioceses in which not all archdeacons are members of a board of finance, whether it shares membership with another governance body or not, archdeacons will be represented. One of two archdeacons is a member of the Ely board, one of three of those of Lincoln, Norwich and Rochester, and one of four of those of Lichfield and Leeds.<sup>52</sup>

The statutory framework establishing diocesan governance ensures that archdeacons spend many hours in meetings. Diocesan practice of having co-terminus membership of the statutory governance bodies enables leaner structures and a more unified approach to matters for which national legislation has provided separately over many years. However, this streamlining approach, as well as membership of boards of finance, which are not combined with other bodies, increases archdeacons' influence beyond that which the law either requires or expects, not least by allowing their voice and their vote to count in matters of finance.<sup>53</sup> The scope of the diocesan governance functions in which archdeacons participate, both as required by law and by additional local practice, gives both them an overview of diocesan life and an involvement in decision-making which in turn allows them to be very influential in diocesan development. In large and diverse dioceses, their detailed knowledge of their own archdeaconries, areas which may be very different geographically, socio-economically and ethnically, will contribute to the formation of diocesan policy and strategy which is balanced and just, neither privileging nor ignoring any group. Whether their membership is legally required or not, archdeacons are involved in decisions concerning the pastoral life of a diocese, its property, strategy and policy and often its finances. Legal requirement, diocesan practice

50 For the Diocese of London's arrangements, see <<https://www.london.anglican.org/directory/diocesan-finance-committee/>>, accessed 22 September 2018. London is not atypical in having archdeacons as members of its principal subcommittees, although full research into this is beyond the scope of this article.

51 This practice is common across dioceses with multipartite meetings.

52 The Church in Wales has fewer combined bodies, which may be different from those of English and other Welsh dioceses. Archdeacons are, however, generally conspicuous by their membership of these bodies, not by their exclusion. Different circumstances pertain in the Channel Islands but the Deanery of Jersey has a finance board and that of Guernsey meets in October 2018 to consider making such provision.

53 Research among archdeacons suggests that only in the Diocese of Winchester are archdeacons without a vote on the DBF.

and lack of legal prohibition all combine to give archdeacons what might be termed both audit and executive powers.

Properly to exercise these duties, the archdeacon must often separate person and role and sublimate private to public considerations. Both quasi-legislation and case law recognise this, quasi-legislation in relation to mission and pastoral matters and case law in relation to property. The code of practice to the DMPC differentiates interest of office from personal interest. Membership of the DMPC assumes the interest of office, 'but account should be taken of the capacity under which a particular issue or question is raised and whether this might constitute a personal interest'.<sup>54</sup> Case law demonstrates, in relation to the faculty jurisdiction and church buildings, that archidiaconal engagement may both facilitate action and contribute to conflict of interest.

### Care of church buildings and property

Canon C 22 requires the archdeacon to 'survey in person or by deputy' 'all churches, chancels, and churchyards' and 'give direction for the amendment of all defects in the walls, fabric, ornaments, and furniture of the same'.<sup>55</sup> In particular, archdeacons 'shall exercise the powers conferred' on them by the Inspection of Churches Measure 1955 as variously amended.<sup>56</sup> This provided for an appropriately qualified person to inspect a church every five years and empowered the archdeacon to arrange for this to happen should it lapse.<sup>57</sup> As the Bishop of Rochester explained to the House of Lords when introducing the Measure, 'archidiaconal legs' may not be 'endowed with the necessary agility and balance to run up and down ladders or to go scrambling over roofs'.<sup>58</sup> Since, in 1954, the repair bill of churches in the Diocese of Lincoln could have been reduced by an estimated 75% had minor repairs consequent

54 Mission and Pastoral Measure 2011, Code of Recommended Practice, available at: <[https://www.churchofengland.org/sites/default/files/2017-10/mission\\_and\\_pastoral\\_measure\\_2011\\_-\\_volume\\_1.pdf](https://www.churchofengland.org/sites/default/files/2017-10/mission_and_pastoral_measure_2011_-_volume_1.pdf)>, accessed 12 October 2018, p 11, concerning patronage boards, where the potential conflict is deemed as no conflict given the 'wider diocesan role' of both bishops and archdeacons.

55 Canon C 22(5).

56 Principally by the Care of Churches and Ecclesiastical Jurisdiction Measure 1991, the Care of Churches and Ecclesiastical Jurisdiction (Amendment) Measure 2015 and the Ecclesiastical Jurisdiction and Care of Churches Measure 2018.

57 The 1955 Measure ss 2(1) and (2) still confers the power for an archdeacon to ensure that a five-yearly survey of a church by a qualified person is undertaken; this is repeated in the 2018 Measure. The Cathedrals Measure 1999 imposes this duty upon the chapter rather than the archdeacon; Cathedrals Measure 1999, s 20. In the Diocese of London, the archdeacon always instructs the quinquennial inspector and receives the report; anecdotal evidence suggests that this is unique to London.

58 The Canons of 1603 (Canon 86) required three yearly inspection by the archdeacon or others 'which have authority to hold Ecclesiastical Visitations', but this may have been more honoured in the breach. See *The Constitutions and Canons Ecclesiastical (Made in the Year 1603 and amended in the years 1865, 1887, 1936, and 1946)* (SPCK 1960), p 37. What the Bishop actually said, in keeping with the times, was, 'because a man exchanges a pair of trousers for a pair of gaiters, it does not mean that his archidiaconal legs are thereby endowed with the necessary agility and balance to run up and down ladders or to go scrambling over roofs'. See HL Deb 24 February 1955 vol 191

upon proper inspection been undertaken, the bishop might have added that even an agile archdeacon may not be possessed of the necessary competence to carry out proper examination.<sup>59</sup> Canon F 18 nevertheless repeats the requirement for inspection:

every archdeacon shall survey the churches, chancels, and churchyards within his jurisdiction at least once in three years, either in person or by the rural dean, and shall give direction for the amendment of all defects in the fabric, ornaments, and furniture of the same.

Canon F 17 connects this with the ministry of the bishop in a manner reminiscent of Canon C 22. The bishop shall ‘ensure that a full note and terrier of all lands, goods, and other possessions . . . be compiled and kept by the minister and churchwardens’ but the archdeacon ensures that it is done.<sup>60</sup>

Perhaps as a result of these various requirements, present archidiaconal practice in relation to inspections varies considerably. In some dioceses, annual visits to parishes combine elements of a Canon C 22 visitation with elements of an inspection. The archdeacon or area dean meets with the churchwardens and inspects the state of the buildings, registers, terrier and inventory, ‘fabric, ornaments and furniture’, and matters of pastoral concern: the well-being of the clergy; churchwardens and leading laity; the parish’s mission, outreach and evangelism.<sup>61</sup> In other dioceses, only the archdeacon will conduct an annual inspection. In others, this is delegated to a commissary other than the rural dean. Many archdeacons or area deans inspect on a triennial basis, some less frequently. In large rural dioceses, the rural deans undertake all inspection work.<sup>62</sup>

Archdeacons’ involvement in church property is not limited to inspecting buildings. Archdeacons are statutorily members of the diocesan advisory committee, advising the chancellor, including in relation to faculties for changing

col 454; available at <[https://api.parliament.uk/historic-hansard/lords/1955/feb/24/inspection-of-churches-measure-1955#column\\_454](https://api.parliament.uk/historic-hansard/lords/1955/feb/24/inspection-of-churches-measure-1955#column_454)>, accessed 23 September 2018.

59 On this, see <[https://api.parliament.uk/historic-hansard/lords/1955/feb/24/inspection-of-churches-measure-1955#column\\_454](https://api.parliament.uk/historic-hansard/lords/1955/feb/24/inspection-of-churches-measure-1955#column_454)>, accessed 23 September 2018.

60 Canon F 17, Of keeping a record of the property of churches. For the bishop’s duty, see F 17(1); for the archdeacon’s, see F 17(2): the archdeacon shall ‘at least once in three years, either in person or by the rural dean, satisfy himself that the directions of the preceding paragraph of this Canon have been carried out’.

61 This is the case in the Diocese of Southwark, where inspections are shared (usually with the area dean but sometimes with deanery lay chairs); the archdeacon generally visits every three years, with others doing so in the intervening two.

62 In the Diocese of Truro, archdeacons do their own annual inspections; Carlisle archdeacons inspect triennially; Coventry rural deans do this; Lichfield involves lay chairs; Hereford inspections are quinquennial. Several dioceses, including Derby and Ely, are reviewing their practice.

churches.<sup>63</sup> Archdeacons are among the principal parties concerned with the operation of the faculty jurisdiction rules, and particularly the so-called 'List B' matters for which archdeacons may grant authorisation.<sup>64</sup> Under the rules, in specified circumstances they must be given, or must give, information. In using the powers conferred by the rules, archdeacons must adhere to certain conditions.<sup>65</sup> Archdeacons can no longer grant faculties<sup>66</sup> but other powers also conferred by previous rules remain: to permit temporary minor re-ordering in churches within their archdeaconries, for a limited period, at the end of which a faculty must be sought or the temporary re-ordering reversed,<sup>67</sup> to order the removal of specified items to a place of safety; to petition for a faculty; to be considered as an interested party; and to apply for an injunction or restoration order.<sup>68</sup> The rules also recognise possible conflicts of interest as well as respecting the close particular knowledge that archdeacons should have of their archdeaconries, both of which, as indicated above, have been noted in case law.

In 2009, the Victorian Society successfully appealed the sale of a font from St Peter, Draycott. Sheila Cameron QC, Dean of Arches, rejected the evidence of an archdeacon's letter because 'the archdeacon was obviously expressing strong personal views': the parish was in a vacant archdeaconry.<sup>69</sup> *Re St Mary, Barnes* famously involved a faculty granted by a bishop, a subsequent faculty to

- 63 Care of Churches and Ecclesiastical Jurisdiction Measure 1991. Schedule 1 concerns membership; Schedule 2 sets out the functions of the committee.
- 64 The importance of archdeacons in the faculty process is attested to in G H Newsom and G L Newsom, *The Faculty Jurisdiction of the Church of England* (second edition, London, 1993), pp 43–44 and *passim*. See also C Mynors, *Changing Churches* (London, 2016), especially pp 43–44 on the role of the archdeacon. It should also be said that good relationships between archdeacons and diocesan chancellors are immensely important in the smooth operation of the faculty jurisdiction.
- 65 See Faculty Jurisdiction Rules 2015, Statutory Instrument 2015 No 1568, for example at Rule 11(1)(7)(c): directions of the consistory court given without a hearing must be sent by the registrar to the archdeacon; 11(3)(2)(b): directions as to the date, time and place for a consistory court hearing must be served by the registrar on the archdeacon; 3(3)(2)(5) prescribes that an archdeacon declining 'to give notice that a proposal may be undertaken without a faculty . . . must inform the applicants that they may, if they wish, petition the court for a faculty to authorise the proposal'; 3(3)(2)(a): the archdeacon 'must seek the advice of the Diocesan Advisory Committee or such of its members or officers as the archdeacon thinks fit before deciding whether to give notice that it may be undertaken without a faculty'.
- 66 The amended 1991 Measure allows archdeacons to exercise 'the jurisdiction of the consistory court of the diocese in such faculty matters relating to the archdeaconry, to such extent and in such manner as may be prescribed'; the 2015 Rules make no such provision.
- 67 Faculty Jurisdiction Rules 2015. Temporary minor re-ordering for a prescribed period is permitted under the Care of Churches and Ecclesiastical Jurisdiction Amendment Measure 2015 s 2(3)(7); the 2015 Rules prescribe a maximum period of 15 months at Part 88(8)(1)(i).
- 68 Faculty Jurisdiction Rules 8(1), 5(2), 10(1); Care of Churches and Ecclesiastical Jurisdiction Measure 1991 as amended, s 14(5). For a restoration order sought under the 2015 Rules by an archdeacon, see [2016] ECC SEI 1. See also Hill, *Ecclesiastical Law*, p 225, on the nature of the archdeacon's role in faculty hearings. See *Legal Opinions*, p 184, on the possibility of an archdeacon applying for judicial review if the PCC and churchwardens are unwilling to commence proceedings for the recovery of church property disposed of improperly.
- 69 *Re St Peter's, Draycott* [2009] Fam 93.

address the inadequacies of the first, and an archdeacon who was also priest-in-charge of the parish.<sup>70</sup> The case highlighted the complexity of the archdeacon's role in ensuring that no one duty of the office predominates to the detriment of others.<sup>71</sup> It is perhaps not surprising that the 2015 faculty jurisdiction rules transfer archdeacons' powers to the chancellor if the archdeacon is also the incumbent of the parish.<sup>72</sup>

### Pastoral care and discipline of the clergy

Archdeacons bring to their property work detailed knowledge of buildings and parishes. A parallel grasp of detail and a familiar execution of roles not mandated to them by law also inform their work in relation both to clergy pastoral care and to clergy discipline and capability.

The Clergy Discipline Measure 2003 does not give archdeacons a formal role in bringing complaints against the clergy. Its code of practice, however, instances the archdeacon as 'an appropriate person' in determining whether a discipline case should be brought, and as a possible complainant.<sup>73</sup> The Ecclesiastical Office (Terms of Service) Measure 2009 introduced both a grievance and a capability procedure for clergy. The archdeacon is normally 'the appointed person' to investigate a possible capability issue and then to institute proceedings should this be deemed necessary.<sup>74</sup> Similarly, the archdeacon is 'usually' the person who handles grievance complaints, both in their initial informal and later formal stages.<sup>75</sup> These Measures are evidence of a change in Church of England legislation, with a move to less detailed primary

70 *Re St Mary, Barnes* [1982] 1 WLR 531 at 532. The first faculty effectively sanctioned contravention of the Burial Act 1857, s 25, under which it is offence for a body or any human remains which have been interred in a place of burial to be removed unless in compliance with certain stated conditions.

71 The Canon F 17 inspection of the records of the church should have included the faculty and enabled the archdeacon to have perceived its inadequacies, which clearly were not apparent or not discerned, earlier in the process. Newsom and Newsom also draw attention to the duty to survey under Canon C 22 and indicate the archdeacon's importance to the chancellor if churches and their churchyards are to be cared for properly: 'the parish officers below him and the chancellor above him reply on his knowledge and judgment'. See Newsom and Newsom, *Faculty Jurisdiction*, pp 97–98.

72 Faculty Jurisdiction Rules 2015, s 3(3)(6), 'if the archdeacon is the incumbent or priest in charge of a benefice where it is proposed to undertake a matter that is prescribed in List B, references in this rule to the archdeacon are to be read as if they were references to the chancellor'. A comparable separation of roles is apparent in Canon B 20(1): the minister, with the agreement of the PCC, may appoint or terminate the appointment of the organist, choirmaster or director of music save that the agreement of the PCC may be dispensed with, if the archdeacon so directs; where, however, 'the minister is also the archdeacon of the archdeaconry concerned, the function of the archdeacon under this paragraph shall be exercisable by the bishop of the diocese'.

73 Code of Practice: Clergy Discipline Measure 2003 (London, 2014), p 3. The archdeacon was the complainant in 15 of the 23 tribunal cases recorded at <<https://www.churchofengland.org/about/leadership-and-governance/legal-services/clergy-discipline/tribunal-decisions>>, accessed 1 September 2018.

74 Ecclesiastical Offices (Terms of Service) Regulations 2009: Capability Procedure Code of Practice, s 4(1). Section 4(3) recommends that the archdeacon should not then be on the capability panel deciding the outcome.

75 Ecclesiastical Offices (Terms of Service) Regulations 2009: Grievance Procedure Code of Practice.

legislation, supplemented by codes of practice.<sup>76</sup> However, whether their functions are described in primary or quasi-legislation, it seems clear that the archdeacon will remain key to operation of law pertaining to the discipline, efficacy and fair treatment of the clergy.

Archdeacons' involvement in clergy pastoral care is also covered in quasi-legislation rather than in canon or Measure, usually through local diocesan guidance. Such care may take the form of direct contact with clergy or in relation to the practicalities of parochial life. Parishes turn to their archdeacon for advice on subjects as diverse as the parish mission statement, the state of the church gutters, drains and downpipes, issues of health and safety, parish contributions to diocesan funds, permission to waive parochial fees, and the health and well-being of the clergy.<sup>77</sup> Diocesan matters which may be referred to archdeacons include (formally) regulations for the admission of children to Holy Communion before confirmation and (informally) ensuring that parish profiles are completed in a vacancy.<sup>78</sup> The care of clergy individually might find its way into the archdeacons' portfolio through: ministerial development review, also introduced by the 2009 Measure; advice or permission concerning annual and special leave; time off for public duties; maternity/paternity, adoption and parental leave; grants in case of hardship or debt; sickness; working expenses; resignation and retirement including housing; parsonage maintenance; role descriptions; jury service; lodgers; counselling; and emergencies.<sup>79</sup> The lists of areas in which archdeacons are deemed to be expert, or at least informed, means that their own ministry is considerably shaped by diocesan guidance; it also suggests that the efficacy of any legislative instrument will be assured only if the relationship is at the heart of that ministry.

## DESCRIBING ARCHDEACONS

The earlier articles to which this one referred above insisted determinedly on the pastoral heart hidden inside an archdeacon. This paper has suggested rather that

76 See 'Report of the Simplification Task Group', GS 1980, throughout but especially, for instance, p 25, para 71; available at <<https://www.churchofengland.org/sites/default/files/2018-01/GS%201980%20Report%20of%20the%20Simplification%20Task%20Group.pdf>>, accessed 1 September 2018.

77 See, for example, Diocese of Chelmsford, *A Handbook for Ecclesiastical Office Holders*, p 10, available at <[https://www.chelmsford.anglican.org/uploads-new/publications/Ecclesiastical\\_Office\\_Holders\\_Handbook\\_v1\\_April\\_2018.pdf](https://www.chelmsford.anglican.org/uploads-new/publications/Ecclesiastical_Office_Holders_Handbook_v1_April_2018.pdf)>, accessed 31 August 2018; Diocese of Southwark, *Guidelines for Clergy and Conditions of Service 2018*, p 9, available at <<http://southwark.anglican.org/downloads/resources/clergyandconditions2018.pdf>>, accessed 1 September 2018.

78 The Administration of Holy Communion Regulations 2015, Reg 2(2), permit a bishop to designate an archdeacon to exercise power under the regulation on the bishop's behalf; see <<https://www.churchofengland.org/sites/default/files/2017-10/holy%20communion%20regulations%20-%20july%202015%20approved.pdf>>, accessed 12 October 2018.

79 Sample from the diocesan handbooks of the dioceses of Carlisle, Chelmsford, Lichfield, Newcastle, Portsmouth, St Albans, Southwark and York.

the law places archdeacons in relationship: to the bishop, to churchwardens, to parishes and to clergy. They should be present at the beginning of new ministries, examining candidates for holy orders, presenting candidates to the bishop in the ordination service<sup>80</sup> and, in due course, inducting duly instituted incumbents into the temporalities of their benefices.<sup>81</sup> They receive rather protean treatment at the hands of the law and sometimes stand in others' shoes in order that the mission of the church may be effected. They may be regarded in the same way as parish clergy, being interested parties with rights to be consulted in the event of a pastoral scheme or order affecting the archdeaconry.<sup>82</sup> If dispossessed, they, like parish clergy, may be entitled to compensation.<sup>83</sup> They may act for rural deans, whom the canons also see as their deputies. When a new parish is created (but vacant), the area dean 'should . . . initiate action' to hold a special parish meeting; 'otherwise the archdeacon' fulfils this duty.<sup>84</sup> Archdeacons also, however, deputise for the bishop: in the case of a team ministry patronage board, for example, the bishop may authorise the archdeacon to be its chair.<sup>85</sup> Across the Church of England, as a matter of custom and practice, they admit churchwardens to office on behalf of the bishop.<sup>86</sup>

The diversity of their ministerial tasks place the archdeacons at a nexus in diocesan life, drawing connections between one part and another, bringing different people into different conversations and enabling the full participation of God's people in the life of God's Church.<sup>87</sup> Theirs is a Janus-like task of 'looking before and after' to detect what should be done, and how to deal with what should not have been done, for the mission of the church.<sup>88</sup> The law is

80 Canon C 3(3). Canon C 7 suggests that the bishop should 'call to his assistance the archdeacons and other ministers appointed for purpose' to examine those to be ordained. In practice, archdeacons are only called upon to exercise this function in the Diocese of Guildford. Many archdeacons, however, are expected to testify to the suitability of candidates for ordination in the ordination service. In some dioceses, including some Welsh dioceses, archdeacons may meet with ordinands on retreat or in some other informal or occasional way.

81 Canons C 11, C 22(5). The archdeacon may also be appointed as the bishop's commissary for institution; see Canon C 10(7), although there is considerable variation in diocesan practice here.

82 Mission and Pastoral Measure 2011, s 6.

83 Mission and Pastoral Measure 2011 Schedule 4; see also Mission and Pastoral etc. (Amendment) Measure 2018, which significantly changed compensation levels for parish clergy and extended the new arrangements to those not holding office under Common Tenure, but which continued to include archdeacons in the same manner as parish clergy. The Mission and Pastoral Measure Code of Recommended Practice, I, sets out an appropriate consultation structure at Appendix 1.6, 'Notes on dispossession of clergy and payment of compensation'.

84 The Mission and Pastoral Measure Code of Recommended Practice, I, p 34.

85 Ibid, p 58.

86 Some, such as the archdeacons of the Diocese of Worcester, intentionally meet and admit wardens on several occasions; others, including the Southwark archdeacons, each hold one annual visitation service, although those who cannot attend are admitted on another occasion.

87 Archdeacons relate to and work closely with diocesan secretaries, directors of finance, directors of property and the PAs which many are fortunate enough to have or to share, as well as with those named previously: bishops, chancellors, rural deans and churchwardens.

88 W Shakespeare, *Hamlet*, Act IV, scene 4.

helpful in expressing this responsibility. Its language is often mandatory (archdeacons, ‘when they summon their visitation, shall deliver ... articles of inquiry’);<sup>89</sup> yet, while it gives authority to perform or require certain acts, the law rarely gives archdeacons (or, for that matter, their bishops) power to control or to command.<sup>90</sup> For law, particularly the law of the Church, is not only orders backed by threats.<sup>91</sup> Rather it comprises ‘the combination of primary rules of obligation with the secondary rules of recognition, change and adjudication’ received by ‘a member of the group which accepts and uses them as guides to conduct’.<sup>92</sup> More pertinently, Christian law may be described as an expression of the Christian faith ‘in the form of common norms of action’.<sup>93</sup> Proceeding ‘on the fundamental assumption that Christians broadly obey the laws they make’, the role of the archdeacon is less one of compulsion and more about the provision of ‘the institutional structure in which the incumbent can follow his or her calling to be part of the ministry’ whether this is set by primary, secondary or quasi-legislation.<sup>94</sup> To put it slightly differently, the law gives the archdeacon a ministry of order and facility, whose outworked principles contribute to the achievement of ecclesiastical purpose.

Such a ministry may appropriately be grounded theologically in 1 Corinthians 14.33: ‘for God is a God not of disorder but of peace’. Martyn Percy has drawn attention to the creativity of the archdeacon’s role, in which they act as ‘skilled exegetes’ who need ‘ecclesial intelligence’:

in belief, practice, canon law and heritage (i.e., buildings), they are seldom applying principles in an abstract manner ... They are, rather, interpreting, responding, adapting and discerning; trying to find sufficient common order in the midst of diversity, and attempting to strike a balance between the catholic and local. The role of Archdeacon requires the holder and bearer of office to be flexible and firm; resilient, yet responsive.<sup>95</sup>

89 Canon G 6.

90 This was abundantly apparent in the Churchwardens Measure 2001, which gave no power to anyone to discipline a churchwarden; this has been corrected by s 2 of the Safeguarding and Clergy Discipline Measure 2016, whereby a person may be disqualified from standing as churchwarden or a churchwarden may be suspended by the bishop if specified conditions in relation to safeguarding apply. See also *Jones, Clerk v Ellis and Others* [3 May 1828] 148 ER 918 on powers of entry to churches or chapels possessed by ecclesiastical persons.

91 This was arguably at the heart of *Sharpe v Worcester Diocesan Board of Finance Ltd and another* [2015] ICR 1250. *Bland v the Archdeacon of Cheltenham* [1972] Fam 159 should caution any archdeacon against heavy-handedness.

92 H Hart, *The Concept of Law* (Oxford, 2012), pp 98 and 89.

93 N Doe *Christian Law* (Cambridge, 2013), p 1.

94 C Shelley, ‘*Sharpe v Worcester*’, (2015) 17 Ecc LJ 398–399 at 399.

95 Martyn Percy, ‘Archidiaconal ministry: a theological reflection’, in Oxford Centre for Ecclesiology and Practical Theology, *Sustaining Leaders in Mission and Change: the continuing ministerial development of archdeacons in the Church of England* (Oxford, 2011), pp 35–46 at pp 35–36. The national Church



Percy might have said that archdeacons are not only often to be found balancing the universal and the particular, but also in seeking a path between what is and what might be. The Mission and Pastoral Measure 2011, for example, provides for bishop's mission orders to facilitate new mission initiatives. A bishop consults about the suitability of such an initiative but may delegate actually doing so to the archdeacon.<sup>96</sup>

How, then, are archdeacons to be described? They are, perhaps, 'all things to all people', participating widely in the Church's life. Within the Church of England, the mediaeval uncertainty as to whether they could be saved would seem to have been resolved in their favour, for they are priests, bringing to their archidiaconal ministry their priestly calling to be 'messengers, watchmen and stewards', 'to teach and to admonish'.<sup>97</sup> As they do so, they help to guide the Church through tensions in personal relationships, within diocesan life, and between the imperatives of mission and maintenance.<sup>98</sup> They are creatures of the Church's law and they use the law for its mission as they share with the bishop 'in the oversight of the Church, delighting in its beauty and rejoicing in its well-being'.<sup>99</sup>

provides a three-day induction programme for new archdeacons. Thereafter, a part-time officer, paid for by dioceses at the request of the archdeacons, oversees their continuing ministerial development. For this, and for other matters, archdeacons meet nationally every two years and regionally annually. There are also more frequent meetings between archdeacons of adjacent dioceses. As the part-time officer's appointment is time-limited, and there is no national funding stream for archdeacons' training, the archdeacons are considering how their ministry continues to be resourced with the support of dioceses.

- 96 Mission and Pastoral Measure 2011, Part 7, Mission Initiatives Code of Practice, incorporating the approved House of Bishops' Code of Practice, p 4, available at <<https://www.churchofengland.org/sites/default/files/2017-12/Working%202012%20text%20BMO%20CoP.pdf>>, accessed 23 September 2018.
- 97 'The ordination of priests, also called presbyters', in *Common Worship Ordination Services: study edition* (London, 2007), p 37.
- 98 Percy, 'Sustaining leaders', p 37.
- 99 'The ordination of priests', p 32.