



Alison Talbot <atalbot@wslaw.co.uk> 22:28 (40 minutes ago on 22-10-20)
to Brian Wilson (Thompsons Solicitors)

Dear Brian

You will no doubt be aware that a complaint was made to Christ Church last week by an individual in relation to your client's conduct. As this raised a safeguarding issue, in accordance with Church of England practice, it was referred to the Diocesan Safeguarding Adviser who conducted a risk assessment and recommended an investigation. There has been a fact finding investigation by an independent investigator, Kate Wood. A preliminary summary of the investigation has been provided to Christ Church confirming that in the view of the investigator, the complaint is credible and the incident complained of did happen. The investigator is concerned that your client may pose a degree of risk to other young women which needs to be assessed again as a matter of urgency.

Given the seriousness of the incident and the nature of your client's role it is considered necessary for immediate additional safeguarding measures to be put in place at Christ Church until the matter can be fully re-assessed in light of the investigator's report, which is expected next week.

I understand that the Bishop of Oxford has already spoken with your client and asked him to voluntarily step back from his duties but your client has declined to do so. Your client's suggestion to manage the situation over the next couple of weeks was that your client should be informed of when the complainant is due to be in the Cathedral so that he can avoid the Cathedral at those times. This is wholly unsatisfactory. In circumstances where your client has already breached the agreement that he made with the Sub Dean last week not to have one to one contact with individuals in the course of his role, he cannot be relied upon to self-manage the situation and providing him with a list of times when the complainant will be alone in the Cathedral would not be appropriate.

Other concerns have been raised about your client's conduct during the last week. At this stage no formal complaints have been received in relation to these matters, but if any should be received they would have to be taken seriously.

Christ Church's trustees must take reasonable steps to protect from harm people who come into contact with their charity. This includes: the charity's beneficiaries, employees, volunteers and those connected with the activities of Christ Church. The Charity Commission demands that this should be a governance priority for all charities and is a fundamental part of operating as a charity for the public benefit. In the circumstances and pending receipt of an updated risk assessment, our client considers that the only appropriate way for Christ Church to fulfil those obligations is either for your client to voluntarily step back from his role for the time being or for Christ Church to formally suspend your client in order to meet their safeguarding obligations. Your client has asked us not to take any procedural steps pending his interview with the police next week, and we presume he would rather avoid any formal process. It is therefore preferable for your client to agree to do this voluntarily rather than to cause our client to invoke a formal process.

Your client is therefore asked to voluntarily comply with the following restrictions until the earlier of
1) a safeguarding risk assessment commissioned by Christ Church or carried out by the Diocese

of Oxford confirming that your client is not a safeguarding risk or 2) 30 November 2020. If the matter has not been resolved by 30 November the position can be reviewed.

During this period your client is required to:

- Refrain from carrying out any of his duties as Dean of the Cathedral, including both internal and external facing activities; for the avoidance of doubt, this includes having any meetings in person with members of the Cathedral staff or members of the congregation unless it is a member of Chapter who has expressly invited your client to a meeting.
- Refrain from carrying out any of his duties as Dean of Christ Church, including both internal and external facing activities; for the avoidance of doubt, this includes having any meetings with junior members or staff (academic and non-academic) in person
- Refrain from carrying out any of his duties as ex officio Chair of the Cathedral School's Board of Governors, including both internal and external facing activities for the avoidance of doubt, this includes refraining from having any meetings with pupils, their families or staff in person.
- Refrain from visiting the Cathedral unless it is with the prior agreement of the Sub-Dean for the purposes of private prayer. Such visits to be primarily when no one other than the Sub-Dean or another appointed person is present.
- Refrain from visiting any of the Canonries unless invited to do so in advance.

If he is unable to confirm that he will comply with these requirements by 10am tomorrow morning we will have advise our client that the Governing Body should to take steps to ensure they can safeguard their beneficiaries, employees, volunteers and those connected with the activities of Christ Church which is likely to lead towards a formal suspension. I understand your client will be in the Employment Tribunal tomorrow morning from 10am so we need to know his answer before then.

Yours sincerely

Alison Talbot