

**ROYAL COMMISSION OF INQUIRY  
ABUSE IN CARE**

**UNDER** Inquiries Act 2013

**IN THE MATTER** of Royal Commission of Inquiry into Historical Abuse in State Care and in the Care of Faith-based Institutions, *Te Kōmihana Karauna mō ngā Tūkino o Mua kit e Hunga i Tiakina e te Kāwanatanga i Tiakina hoki e ngā Whare o te Whakapono*

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**CLOSING SUBMISSIONS ON BEHALF OF THE ANGLICAN CHURCH IN  
AOTEAROA, NEW ZEALAND AND POLYNESIA FOR REDRESS HEARING  
26 MARCH 2021**

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## Introduction

1. The Anglican Church in Aotearoa, New Zealand and Polynesia/Te Hahi Mihinare ki Aotearoa ki Niu Tireni, ki Nga Moutere o Te Moana Nui a Kiwa (**Anglican Church**) and the Anglican care organisations and schools listed in the attached Schedule present this closing in order to:
  - a. acknowledge the issues that have been raised during the redress hearings;
  - b. set out the Anglican Church's position on those issues; and
  - c. identify issues which require further reflection by the Royal Commission and relevant participants.
  
2. The Anglican Church reiterates the apologies offered by the Archbishops and Bishops in the evidence.<sup>1</sup> As the Archbishops said:

*[i]t is horrific, shameful and completely unacceptable that people in our care have suffered abuse. We recognise and acknowledge that abuse has occurred within our church and we apologise unequivocally. We want to acknowledge the courage and the strength of those who have given testimony to this Royal Commission...We apologise to you unequivocally.*

...

*Survivors have had to live with the consequences of the trauma they suffered for decades. This suffering is almost impossible to comprehend. We want to extend our deepest sympathy and sorrow to you for all that has happened. We apologise unequivocally. We apologise to all who have been abused while in the care of the church and have suffered through the failures of all those who were meant to protect and care for them. We apologise also to their families who have also carried the long-term consequences of abuse. We acknowledge what has happened. We apologise unequivocally and without hesitation. We are sorry that this has happened and we want to do all that we can to ensure that it never ever happens again.<sup>2</sup>*

3. Abuse within the Church is wrong. Too often the handling of disclosures of abuse was not survivor-focussed and even now the Anglican Church finds itself without an appropriate, consistent process.

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<sup>1</sup> The Rt Rev'd Ross Graham Bay Witness Statement [WITN0259002] dated 12 February 2021, at [17]-[19]; Transcript of Proceedings, 214, L27-34; Transcript of Proceedings, 215, L1-3; The Rt Rev'd Dr Peter Ruane Carrell Witness Statement [WITN0260002] dated 12 February 2021 at [19]-[36]; Transcript of Proceedings, 291, L21-23; Transcript of Proceedings, 292, L1-14; The Most Reverend Philip Richardson Witness Statement [WITN0265001] at [14]; The Primate of the Anglican Church of Aotearoa New Zealand and Polynesia Witness Statement [WITN0265167, WITN0266001 & WITN0299001] dated 12 February 2021 at [4]-[9]; Draft Transcript of Proceedings, 288, L11-20, L30-32 (19 March 2021); Draft Transcript of Proceedings, 301, L27-31 (19 March 2021); Draft Transcript of Proceedings, 402, L20-23 (22 March 2021).

<sup>2</sup> Draft Transcript of Proceedings, 443, L17-34 & 444, L1-14 (22 March 2021).

4. Too often the Anglican Church has been reactive rather than pro-active in dealing with these issues. However the Anglican Church has attempted – and will continue to attempt – to become pro-active and to ensure a healthy and safe culture.
5. An important step taken to do that was asking for faith-based institutions to be covered as part of the work of this Commission. However the Anglican Church acknowledges that is not sufficient in itself and that it cannot wait until the Commission reports to advance the important work in this area.

### **Safeguarding**

6. Although the hearing was focussed on redress rather than safeguarding issues there were questions asked about the topic. The Anglican Church wants to provide an interim response on those issues.
7. There is a fundamental need for safeguarding policies to be consistent across the core Church. To that end the Anglican Church will mandate a body within the Church to create consistent safeguarding policies applicable throughout the core Church. It will also require regular, external reviews of the policies and their effectiveness.
8. That is consistent with the recommendations of the Australian Royal Commission and also the Inquiry in England and Wales<sup>3</sup>.
9. For schools and care institutions there are obligations already in place particularly through the Children’s Act 2014<sup>4</sup> and for schools compliance with those obligations is monitored through the Education Review Office reviews and reports. In assessing any recommendations in this area the Commission should consider the existing regulatory framework.
10. One of the recommendations from the Australian Royal Commission was<sup>5</sup>:

*[r]eligious institutions in highly regulated sectors, such as schools and out-of-home care service providers, should report their compliance with the Royal Commission’s 10 Child Safe Standards, as monitored by the relevant sector regulator, to the religious organisation to which they are affiliated.*

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<sup>3</sup> Prof. Alexis Jay and others, *Independent Inquiry into Child Sexual Abuse: The Anglican Church Investigation Report* (CCS0620778888, October 2020) and *Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report Recommendations*, (December 2017).

<sup>4</sup> See for instance section 18 of the Children’s Act 2014.

<sup>5</sup> *Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report Recommendations*, Vol 16 (December 2017) at 56.

11. The Anglican Church endorses some form of reporting by schools and care institutions of their compliance with safeguarding regulations. For schools continued reporting through the Education Review Office seems most appropriate. For care institutions reporting should be to an appropriate regulatory body. There is limited utility in such reporting being to the Anglican Church. It would be preferable if such reporting was publicly disclosed as Education Review Office reports are.

#### **Extent of abuse within institutions**

12. Questions were asked during the evidence around inquiries that had taken place in Australia and England and Wales and the applicability to New Zealand of those findings as to the scale of the abuse and the way in which church structures contributed to that.<sup>6</sup>
13. Caution needs to be exercised in relation to these comparisons. While there are similarities between the Anglican Church and the sister organisations in England and Wales and Australia, there are differences.
14. For example:
- a. the Australian Church is much larger and has a more extensive network of schools and care entities;
  - b. there is a greater proportion of students in church schools in England and Australia (with Australia having a considerably greater percentage of students in private schools);<sup>7</sup>
  - c. the Church of England and Church in Wales are also larger, with more entities including a larger network of schools and care entities;
  - d. issues of class arise in England and Wales to a greater extent than they do here – or at least have done so historically;
  - e. the Australian Church and the Church of England and Wales may have more direct and different control over institutions like schools than is the case in New Zealand;<sup>8</sup>
  - f. the Church of England is more hierarchical and prone to clericalism than in New Zealand – a product of size and the established nature of the Church of England; and
  - g. since 1980 the New Zealand Church has been working to understand the effects of colonisation and power imbalances. It allowed for the ordination of female priests some 15 or so years before the Australian Church or the Church of England – meaning the move away from a

<sup>6</sup> Transcript of Proceedings, 308, L18-34; Transcript of Proceedings, 309-312; Transcript of Proceedings, 313, L1-6 & 26-33; Transcript of Proceedings, 333, L31-34; Draft Transcript of Proceedings, 445, L24-27 (22 March 2021).

<sup>7</sup> The Australian National University Centre for Economic Policy Research, Discussion Paper No. 479 (<https://rse.anu.edu.au/researchpapers/CEPR/DP479.pdf>); Te Ara The Encyclopaedia of New Zealand, Private Education (<https://teara.govt.nz/en/private-education/page-1>).

<sup>8</sup> Transcript of Proceedings, 393, L23-31.

patriarchal organisation started earlier (though the work continues). This awareness of those within the Church community who are disempowered can be expected to have led to a greater awareness of the need for care in relationships where there is a power imbalance.

15. In addition, extrapolating from the Australian findings that it takes an average of 29 years for someone to report a case of abuse so therefore there might be a wave of cases reported from the 1970s and 1980s soon may not be appropriate. After all, the 1970s were 40—50 years ago and the 1980s were 30-40 years ago.
16. There will be unreported cases yet to come, however there is limited evidence in New Zealand to suggest there is a wave to come. The work of the Commission should be evidence-based. It remains open that there are simply proportionally fewer cases in New Zealand than there were in Australia and England and Wales.
17. There are still lessons that can be drawn from Australia and England. Clearly there has been a lack of a consistent approach to handling disclosures, providing redress and discernment for ordination in the Anglican Church. That echoes the findings in Australia and England.
18. In saying all of this, the Anglican Church frankly acknowledges that it does not know what it does not know. It repeats the call for survivors to come forward to this Commission.
19. The Anglican Church has also contributed to a lack of clear information through poor and inconsistent processes for record keeping. The Anglican Church will legislate at the general Synod/Te Hinota Whānui in 2022 for a record retention policy to apply throughout the Anglican Church. Anglican entities will be urged to adopt the policy.

#### **Issues relating to Anglican entities**

20. As mentioned previously in the evidence, there are a handful of schools and entities that did not join the central representation in relation to this Commission.<sup>9</sup> The Anglican Church does not purport to speak for these schools and entities, but the ideas and recommendations expressed in these submissions would apply equally to them and indeed all schools and care organisations.
21. As outlined in the evidence, the Anglican Church comprises the ‘core Church’ and then affiliated entities.<sup>10</sup> In some cases the core Church has a bishop as warden of an entity, the right to appoint boards, the right to approve trust deed changes and exercise more direct control over the entity.

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<sup>9</sup> The Most Reverend Philip Richardson Witness Statement [WITN0265001] at [68].

<sup>10</sup> The Most Reverend Philip Richardson Witness Statement [WITN0265001] at [19].

22. In other cases, there is a less direct relationship with the entities in question and the relationship is largely one of theological/spiritual oversight.
23. Some of the questioning of the witnesses (particularly Bishop Peter Carrell) focussed on the role of a bishop in relation to Anglican schools, the handling of claims and suggested that there should be a more active oversight in relation to issues such as safeguarding and redress policies.<sup>11</sup>
24. In relation to this, these questions about the possible number of cases related to schools, such as Christ's College, were directed to witnesses not directly involved in handling the redress process.
25. If the Commission wants to obtain accurate information then witnesses from individual entities are willing and able to assist and it would seem more appropriate that they be asked questions on specific matters of fact.
26. For example, the redress process at Christ's College – which is a good example of a survivor-focussed and non-legalistic process – is being primarily handled by the board chair; he has provided evidence to the Commission and would be able to answer questions.
27. Turning to the specific suggestions of a more active role, a number of issues arise. Before considering those, the Anglican Church accepts that bishops at all times have a moral obligation to ensure boards focus on issues of safekeeping and redress.
28. Indeed the significant commitment of Anglican schools to the work of this Commission demonstrates this. The evidence filed by several schools for this redress hearing also shows the commitment of Anglican schools in this area.<sup>12</sup>
29. The first is that, as put in the questions to Bishop Peter Carrell<sup>13</sup>, the training received by bishops on these issues is limited. The reality is that their expertise in these areas is also limited. It would not assist in preventing abuse, nor assist survivors, if bishops undertook the more active role as suggested.
30. The second is that there needs to be caution with continuing to place additional work on the shoulders of bishops; there is fundamentally a resourcing issue. It follows that some perspective is required when understanding the role of a bishop.
31. A Bishop of the Anglican Church is not the chief executive of a conglomerate. They lead the church and associated bodies through guarding doctrine, overseeing licensed ministers, presiding over worship and encouraging

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<sup>11</sup> Transcript of Proceedings, 224, L4-20; Transcript of Proceedings, 316, L16-34; Transcript of Proceedings, 317, L1-12; Transcript of Proceedings, 323, L3-9.

<sup>12</sup> Diane Helen Humphries Brief of Evidence dated 5 November 2020 and Hugh Simon Lindo Brief of Evidence dated 5 November 2020.

<sup>13</sup> Transcript of Proceedings, 298, L6-21.

excellence in pastoral practice. For core Church life, bishops have some ability to direct ordained and lay ministers. For associated bodies, bishops are less able to direct boards and executives but have the opportunity to influence. While the work of the Royal Commission is focused on abuse in care, that particular focus should not be allowed to dominate an understanding of the daily work of our Bishops.

32. The third is that it ignores the existing regulatory framework that applies to schools and care entities relating to vulnerable people, safeguarding and discipline. There exists, already, regulation and supervision of these issues. Existing oversight of schools is a matter of specific learning and training. Review by a bishop or a church would add little.
33. The fourth issue is that agreement with entities would need to be reached to allow for such a role. It cannot be assumed that agreement would necessarily be reached; especially by those where the relationship is more one of influence than direct control.
34. The final issue is that any such approach would simply reinforce the siloing within dioceses which is one of the biggest issues the Anglican Church has historically had in dealing with abuse and redress. Reviews by individual bishops or dioceses will not assist in developing a consistent national standard to these issues.
35. Likewise, reviews by Anglicans or Anglican organisations run the risk of their approaches differing from those of other faiths in the same sector.
36. The approach of Anglican entities to safeguarding and redress does need review. However:
  - a. any such review should take account of existing regulations and reviews;
  - b. any such review should be done on a national basis to ensure consistency; and
  - c. as discussed further below any such review should be done by an independent body reviewing all similar organisations to ensure consistency across the various sectors.

#### **Issues of liability and responsibility**

37. The biggest issue survivors have faced when it comes to redress is that, as it stands, that law does not generally make institutions liable for abuse that occurs within them. Limitation defences are available. Vicarious liability is difficult to establish. In some cases the ACC bar also complicates matters.
38. In a case such as Mr Oakly – where the abuse occurred outside a Church setting and instead in a community-based setting – it becomes even harder.

39. Compounding the issue is the court process. For reasons of public policy and natural justice court processes involve a rigorous testing of evidence. Such a process can be retraumatising for victims.
40. The position of the Anglican Church is that the approach needs to move from one of a focus on legal liability to one of moral responsibility. Even if the law does not deem the institution as liable the approach should be one of acknowledging responsibility.
41. Such an approach would also allow for a better trauma-informed and survivor-focussed process. For example there need not be a strict holding to rules of evidence nor strict adherence to a legal standard of proof.
42. However such an approach needs community commitment. The current framework is a result of societal views and preferences expressed in our law. There also needs to be a recognition that any financial redress to survivors could not truly compensate for what has occurred. At most it could only ever be a contribution in recognition of what has occurred.
43. This approach can be achieved either by way of legislation or by way of individual entities signing up to a set of agreed principles. The former approach is preferable; consistency across all faith-based organisations and state organisations is needed rather than a piece-meal approach where only some sign-up and others continue to rely on legal defences.
44. In saying all of the above there also needs to be a continuing recognition of the rights of individuals who are accused of wrong-doing. In circumstances where particular findings are sought against individuals then a more formal process would be appropriate.
45. This is especially true in relation to matters of discipline where there are formal consequences. For that reason, while work is needed to ensure the handling of disclosures is trauma-informed and sensitive, the position of the Anglican Church is that Title D is an appropriate process (subject to further comments below).

#### **Principles of redress**

46. The evidence presented has highlighted a number of important principles of redress.
47. First, issues of tikanga and cultural appropriateness are of the utmost importance. As the Archbishops said “[they] believe that a redoubled effort to continue in a genuine, deeply considered, and intentional incorporation of the fundamental principles and frameworks that mātauranga Māori has to offer – including but not limited to values and concepts such as whakapapa,

whanaungatanga, kaitiakitanga, manaakitanga, and aroha".<sup>14</sup> This is of course most relevant to Māori survivors and their whānau, but can be beneficial to all. In cases where survivors identify with other cultures then appropriate and authentic consideration should be given to their own cultural frameworks and understandings.

48. In relation to Maori survivors, questions of whakapono Maori are also important. Again, the best statement is from the Archbishops when they said:<sup>15</sup>

*the point we seek to make here is that wairuatanga, whakapono, and tikanga karakia are important fundamental components of what it means to be Māori. Māori culture is not inherently secular, and therefore seeking to build recommendations for the care of whānau Māori based solely on secular principles would in our view be inadequate and doomed to repeat the failures of the past.*

49. Consideration should also be given to survivors who adhere to different faith traditions, such as Islam, Judaism, and the like. The integrity and value of these faith traditions in relation to the survivors who follow them should not be discounted as part of the survivor's journey of redress and healing.
50. Second, there is the need for any redress to be holistic. Financial redress is a component but should not be the only component of redress. Spiritual and emotional redress are also important and should be provided for.
51. Third, there is a need for redress to be focussed on the needs of the survivor and to be led by their reasonable wishes. In some cases, it may be that on-going support is more important than lump sum payments. Tangible redress should be about more than money and there needs to be flexibility to respond to the survivor's long term needs. However, paternalism – where institutions decide what the survivor needs – has to be avoided.
52. Fourth, the assessment of appropriate redress needs to consider both the nature of the abuse and its impact. Both dimensions are important to any assessment.
53. Fifth, certainty and consistency are vital. These principles create fairness. Across society whatever institution a survivor approaches should have the same approach – and generally speaking the outcomes should be the same. Survivors should not receive different treatment from different institutions. This will have implications for the types of responses the Commission recommends and the extent of their application.

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<sup>14</sup> The Primates of the Anglican Church of Aotearoa New Zealand and Polynesia Witness Statement [WITN0265167, WITN0266001 & WITN0299001] dated 12 February 2021 at [17].

<sup>15</sup> At [20].

54. For instance, the level of redress should not be affected by whether you are abused in the boarding house of an independent school, a state integrated school of special character or a state school. Similarly, the Commission will have to consider whether community and sporting groups who have children under their supervision should also come under the umbrella/subject to the same redress approach.
55. Sixth, there needs to be transparency of any redress process. Survivors are entitled to know what will happen once they make a disclosure. This ties into certainty and consistency, as the survivor will know the outcome they are likely to receive and will be able to make an informed decision on how to proceed. As survivor Jacinda Thompson has also correctly pointed out in her evidence, lack of transparency means that there can be no learning by the wider Church.<sup>16</sup>
56. These are principles the Anglican Church supports and believes should be included as part of any redress process. It endorses the concept of a matrix for redress based on the nature of abuse and its impact. It believes that any matrix should apply across all institutions (state or faith-based).
57. That is subject to any acknowledgment that there needs to be flexibility in the redress matrix to allow for non-financial redress and financial redress which best meets the needs of the survivor.
58. When arriving at appropriate levels for financial redress, careful thought needs to be given to a number of matters. These include past payments made, the support that can be provided by ACC and also, when it comes to international comparisons, the relative income level of New Zealand to other countries (such as those highlighted in Dr Winter's report)<sup>17</sup>.
59. There is then the matter of who will pay. As noted above the law has not, to date, generally made institutions liable for abuse that occurs within them. A requirement that institutions pay redress would effectively be imposing retrospective liability. This aspect needs close focus and care as it has potentially significant ramifications.
60. Not all institutions will be capable of making significant financial payments. Institutions such as care organisations and some schools may be financially crippled - many of which may play an on-going and valuable role in their community. At the same time, if they are financially crippled it will leave some survivors without financial redress undermining the principle of consistency highlighted above.

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<sup>16</sup> Jacinda Karen Thompson Witness Statement [WITN0049001] dated 30 September 2020 at [119].

<sup>17</sup> Dr Stephen Winter, *Development, Delivery and Outcomes: A Report on Redress Prepared in light of the Royal Commission of Inquiry in Historical Abuse in State Care and in the Care of Faith-based Institutions* (20 November 2020) at 4.1, as attached to Stephen Gregory Winter Brief of Evidence dated 4 December 2020.

61. There is also the question of the responsibility of the state for abuse in any institutions given the approach to regulation taken throughout this period.

### **Structuring of redress processes**

62. The Anglican Church acknowledges and accepts that the independent handling of redress is critical for survivors. The failure of the Anglican Church to properly handle redress issues to date means that it has, justifiably, lost the faith and trust of survivors.

63. Given that, the Anglican Church supports the creation of an independent body to handle redress. Its preference is for:

- a. the independent body to be established by way of legislation;
- b. such an independent body to apply across institutions – so it covers state institutions as well as faith-based ones and all churches and religious organisations (even individual congregations not part of a formal church structure);
- c. the independent body to be based on the principles identified by the Network for Survivors of Abuse, being:
  - i. inclusion;
  - ii. Te Tiriti;
  - iii. accessibility;
  - iv. impartiality;
  - v. transparency;
  - vi. consistency;
  - vii. timely access to redress; and
  - viii. human rights and natural justice.

64. There will need to be an opportunity for the individual faith-based and state institutions to be involved in the redress process where appropriate. For some survivors a personal apology has considerable meaning and there needs to be an opportunity for that to continue.

65. It is also worth noting that while an independent body is immediately thought of as monolithic, it need not be. As Dr Stephen Winter said:<sup>18</sup>

*... a unitary programme need not entail monolithic delivery. There are significant accessibility benefits to having multiple agencies offer information and support. Those benefits include the ability of programme to leverage a range of distinctive skills and capacities efficiently. Smaller delivery units may be able to provide a more personal redress experience, leading to more effective resolutions.*

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<sup>18</sup>

At 2.1.

66. There is a risk with an independent body. As Bishop Peter Carrell noted there are a large number of churches and faith-based organisations in New Zealand.<sup>19</sup> There is a risk that any independent body will simply become a large bureaucracy unable to respond properly to the needs of survivors. To that end care will be needed in its design.
67. The Anglican Church is aware that survivors have had negative experiences with ACC and therefore may be reluctant to accept any system that appears similar to it. However, this is a criticism of ACC and not of the approach to compensation for harm which has informed it. The criticism is not a reason to create a different framework or approach. Rather, it is a reason to encourage an entity to do better.
68. In the end, it comes down to what survivors have to do to obtain redress, and the amount of help available to them. Concerns about excessive requirements for claims to be accepted and inadequate support are part of a wider social debate about how funding should be available. The context is not limited to ACC but includes bodies like WINZ and Pharmac.
69. The Anglican Church agrees with the Network for Survivors of Abuse that this demands urgent attention. Recommendations on this issue should not, and need not, wait until a final report.
70. The Anglican Church appreciates that the establishment of an independent body to handle redress may take some time. Survivors should not have to wait until its establishment to obtain redress. The position that the Anglican Church has adopted recently is that claims will be settled, but on an express basis that they can be revisited by the survivor, if they wish, once the outcomes of this Commission are known and can be acted on.
71. In the event that there is no political support for this then the Anglican Church will move to establish its own independent body to handle issues of redress. It would engage with survivors as part of the establishment process to ensure it is survivor focussed.
72. We would welcome a session with the Commission in future focussed on principles of redress and structuring of redress processes. We would welcome further reflection on the evidence of Dr Stephen Winter and discussion on the detail regarding an independent redress structure and how it might operate.

### **Disciplinary processes**

73. As explained above, the Anglican Church considers that its Title D process is, broadly, an appropriate process for handling complaints. It does not see a need for an independent body to undertake that work – especially having regard to

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<sup>19</sup>

Draft Transcript of Proceedings, 278, L6-14 (19 March 2021).

nature and scope of the canon which covers all matters of discipline (including issues of doctrine).

74. However, the Anglican Church does acknowledge that the Title D process is insufficiently independent. To that end, the General Synod/Te Hinota Whānui will consider at its next session a canon to amend Title D to provide that at least one member of any tribunal under Title D must be independent of the Church in the sense of not being a member of it nor affiliated with it. That will include the appeal tribunal.
75. At the same time the penalty where sexual abuse has been committed will be clarified – deposition will be the mandated penalty to acknowledge the severe breach of trust that occurs.
76. Although not dealt with in oral evidence, the Commission has received evidence relating to disciplinary issues in schools. A few comments are appropriate.
77. Schools are subject to a detailed and complex statutory and regulatory framework in relation to safeguarding of students and discipline of teachers.
78. Teacher registration and disciplinary matters are handled by the Teachers' Council. There are certain mandatory reporting obligations for complaints and possible serious misconduct. Teachers have rights in relation to employment and disciplinary matters which can complicate the position in relation to investigating and responding to complaints.<sup>20</sup>
79. There are limits to the regulatory framework. For example, there is no requirement to report a consensual sexual relationship between a teacher and a student over the age of 16. This has been tested, with a student's right to privacy found to predominate.<sup>21</sup>
80. The implications of this framework need to be considered by the Commission.

### **Conclusion**

81. The Anglican Church has learned a lot from the redress hearings. It has heard the voices of survivors and is committed to continuing to work on its policies and practices to try and better meet their needs.

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<sup>20</sup> Diane Helen Humphries Brief of Evidence dated 5 November 2020 at [16]-[26] and [34]; Education Standards Act 2001 (ss 139AK–139AP); The New Zealand Teachers' Council (Making Complaints and Reports) Rules 2004; Education Amendment Act 2015; Education and Training Act 2020.

<sup>21</sup> Diane Helen Humphries Brief of Evidence dated 5 November 2020 at [25].