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Morgan Tait
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Sent via email to: morgtait@gmail.com

21 FEB 2017

Dear Morgan

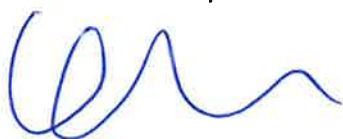
Official Information Act 1982 Request

I refer to your email dated 23 January 2017 requesting, under the Official Information Act 1982 ("the Act"), a copy of any reports or findings from the Department of Internal Affairs investigation into the Christian Church Community Trust ("the Trust").

A list of the documents being released is included in the Appendix. As per the Appendix, certain information has been withheld under section 6(c), 6(d) and 9(2)(a) of the Act. The Department considers that this information should be withheld in order not to prejudice the maintenance of law and to protect the safety and privacy of any persons.

You have the right to seek an investigation and review of my decisions about your request by the Ombudsman pursuant to section 28(1) of the Act. The Office of the Ombudsman can be contacted by writing to PO Box 10-152, Wellington or by email to info@ombudsman.parliament.nz.

Yours sincerely



Lesa Kalapu
General Manager Charities Services



Appendix: Documents for OIA request

#	Name of document	Document date	Summary of contents	Page	Release (R) , Partial Release (P) or withhold (W)
1.	Investigation report	22/12/2016	Charities Services' Investigation Report into the Christian Church Community Trust	1 - 20	P
2.	The Trust's leaving policy	14/11/2016	The Trust's written policy related to people leaving or wanting to return to Gloriavale	21 - 27	R
3.	The Trust's sundry policy	26/11/2016	The Trust's written sundry policies	28 - 33	R
4.	Closing letter	17/10/2016	Charities Services closing letter to the Trust	34 – 36	P

The Christian Church Community Trust

Charities Services Investigation

Paul Budd

22 December 2016

RELEASED UNDER THE
OFFICIAL INFORMATION ACT

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Investigation	The Christian Church Community Trust
Registration Number	CC25088
Date Assigned	20 April 2015
Date Completed	28 October 2016
Investigator(s)	Paul Budd, Senior Investigator (Lead Investigator) Hammond Rees, Senior Investigator Fiona Milne, Investigations Accountant Svetlana Malivuk, Investigator Andrew Grieve, Investigator Jess Hill, Investigator

1. Executive Summary

- 1.1. The current investigation into the operation of the Christian Church Community Trust (**the Trust**) commenced in April 2015 following media reports detailing the increase in persons leaving the community. The persons interviewed made various allegations including financial irregularities, enforced marriage, physical and sexual abuse, forced separation of families and a controlling environment.
- 1.2. Charities Services had previously conducted a review of the Trust in 2012/2013. The focus of the 2012/2013 review was to determine how the Trust advances religion through its activities and the level of engagement it had with the wider community. That investigation concluded that the Trust does advance religion and that it does engage with the wider community sufficient to demonstrate public benefit consistent with the case law.
- 1.3. The parameters of the current investigation were scoped at the onset via an extensive investigation plan, and it was determined that only information in relation to serious wrongdoing, as defined under the Charities Act 2005 (**the Act**) would be sought.
- 1.4. In addition to the above, it was determined that any disclosures in relation to sexual assault or serious physical assault were to be referred in the first instance to the New Zealand Police as soon as practicable. Procedures were set in place to ensure a smooth transition in the case of a referral of a serious criminal nature. Charities Services did have regard to such allegations where they had a direct relationship to potential serious wrongdoing.
- 1.5. During the investigation Charities Services obtained information in order to determine whether the Trust, or anyone associated with the Trust, has engaged in serious wrongdoing. Charities Services also visited the Trust, contacted the Trust on numerous occasions and obtained information from them on how the Trust was being operated.
- 1.6. Charities Services also undertook interviews with all of the Trust's current trustees, being Fervent Stedfast, Enoch Upright and Howard Temple (**the Trustees**), in order to provide them with an opportunity to respond to all the specific allegations under investigation.
- 1.7. Prior to interviews with the Trustees information obtained by Charities Services indicated that the Trust and the persons associated with the Trust, in particular the Trustees, had engaged in conduct that may constitute serious wrongdoing under the Act. At the interviews the Trustees provided information that mitigated some of the issues under investigation however Charities Services remains of the view that the Trust and the persons associated with the Trust still may have engaged in serious wrongdoing under the Act when it comes to other issues under investigation.

- 1.8. Charities Services therefore considered whether the conduct of the Trust and the persons associated with the Trust should be managed by issuing a warning notice under section 54 of the Act. It was determined however that due to the high level of cooperation by the Trustees with Charities Services that a letter notifying the Trust of issues that Charities Services had identified together with the Trustees' agreed resolutions to these issues is to be issued to the Trust which is consistent with the educative harm reduction approach under the Terms of Reference of the Joint Agency Approach (which is discussed further below). This letter will require the Trustees who are formalising all their governance policies and procedures to provide Charities Services with copies of the same.
- 1.9. It should be noted however that if referrals made to other members of the Joint Agency Approach amount to the Trust or any person associated with the Trust being prosecuted for crimes or any other offences, Charities Services may open a new investigation into the operation of the Trust in order to assess its eligibility to remain registered as a charitable entity under the Act.

2. Charity Background

- 2.1. The Trust was incorporated as a charitable trust on 14 June 1991 and was registered as a charitable entity on 30 May 2008.
- 2.2. The Trust's primary activity is operating a non-denominational Christian community near Greymouth, often referred to as Gloriavale (**the Gloriavale Community**).
- 2.3. The purposes of the Trust are provided at clause 9 of the Trust Deed:
 - 9.1. *To provide for the continuing existence and development of the Christian Church Communities according to every commandment and principle of the New Testament and according to the declaration of faith "What We Believe".*
 - 9.2. *As a means of furthering the above object to provide the necessary means and facilities whereby the members of the Christian Church Communities together with any other persons who wish to become members, may live together in their family units as Christian Church Communities, supporting themselves by their own labours, meeting one another's needs equally, and having all things in common.*
 - 9.3 *To provide for the Christian and general education of all the children (and adults as appropriate) of the Christian Church Communities in both secular and spiritual matters according to all the commandments and principles of the New Testament and the declaration of Faith, "What We Believe" (as amended from time to time).*
 - 9.4. *To provide for the preaching of the Gospel, for the education of the public, and if at any time the Leaders think it good to do so, for the establishment in other places of other local Christian Church Communities founded on the same principles to those of the then existing Christian Church Communities.*
 - 9.5. *To help any person or entity that is not a member or a part of the Christian Church Communities in any way the Board sees fit.*
 - 9.6. *To undertake any acts or things which have a charitable purpose in accordance with the law of New Zealand as specifically defined in section 5(1) of the Charities Act 2005 as the Board sees fit.*
- 2.4. The Gloriavale Community is an isolated Christian community that makes efforts to be self-sufficient. The Trust has established a number of sources of income based upon commercial activities such as farming, aviation, protein production, private hunting, midwifery, energy production and oil exploration.

- 2.5. The Trust is governed by a board, whose members are three of the male elders of the community. Hopeful Christian, who is the founder of Gloriavale and the Overseeing Shepherd, retired from his role of trustee back in 2010. As Overseeing Shepherd, he retains the power to reappoint himself to the Board under clause 4.1. of the Trust Deed, as well as the power to appoint Trustees under clause 3.1.3. As well as the Trust, the Gloriavale Community utilises eight limited liability companies (that run the Trust's commercial activities), and a partnership. The Trust also operates three early childhood education centres and a private school all of which are funded by the Ministry of Education.
- 2.6. The Trust owns freehold farmland in the Haupiri Lake district to the value of approximately \$10 million. The value of the Trust's buildings, vehicles and equipment is approximately \$20 million and is not subject to any finance.
- 2.7. The community is believed to consist of between 550 and 600 people¹ who are all expected to agree to a set of doctrines known as "What we believe" which contains both the Gloriavale Community leaders' interpretation of the key doctrines of the Christian faith as well as the rules by which community members are expected to abide by. Members also sign the "Declaration of Commitment to Jesus Christ & His Church and Community at Gloriavale" (**The Declaration of Commitment**) that surrenders all their possessions, money and property to the Gloriavale Community and the Trust.
- 2.8. The specific activities within the Gloriavale Community are overseen by the community leaders that consist of "Shepherds" and "Servants"² (**the Leadership**). Trustees are key members of the Shepherds and Servants. The Leadership enforces the rules of the Gloriavale Community contained within the "What we believe" document and meet frequently to control and coordinate activities within the Gloriavale Community.³
- 2.9. The members of the Gloriavale Community live within its confines and all work for the good of the Gloriavale Community without direct payment or salary. Any income received by individual Gloriavale Community members is paid into their individual bank account which is then donated to the Trust and to accounts held for the Gloriavale Community to pay for donations to the Christian Community in India as well as food, clothing, laundry and medical costs. Necessities are provided for them by the Trust. Weekly living expenses are approximately \$39 per person.⁴

s6(c)

¹ There are approximately 55 families with an average of 8 children each.

² Charities Services was advised by the Trustees that there is essentially no difference in position or rank of Servants and Shepherds. There are currently 16 Servants and Shepherds appointed, with one Servant and one Shepherd responsible for each floor of the four living blocks at the Gloriavale Community.

³ It has been alleged by the former members of the Gloriavale Community that Servants and Shepherds also sit in a disciplinary role spending many hours examining suspected rule breaches by the members of the Gloriavale Community and deciding on sanctions and punishments to be imposed.

⁴ This figure was obtained from calculations supplied by the Trust which have been corroborated from bank account analysis by the Investigations Accountant.

s6(c)

s6(c)

2.11. We note the Trust does not owe any money to external agencies including financiers.

Previous review of the Trust

2.12. The previous investigation into the operation of the Trust commenced on 27 January 2012 and closed on 2 December 2013. s6(c)

This investigation was limited to an in-depth charitable purpose review and did not involve an investigation into whether the Trust or any persons associated with the Trust had engaged in serious wrongdoing as defined under the Act.

- 2.13. The in-depth charitable purpose review concluded the essentially private community did advance a public benefit consistent with the previous cases on the advancement of religion.
- 2.14. During the course of the previous investigation, the Trust advised that it neither controlled, nor provided any financial support to, the Christian Community in India whatsoever.⁷ The Trust did however advise Charities Services that funds may be provided to the Christian Community in India from the members' own personal funds.

3. Initiation of the current investigation

- 3.1. On 19 April 2015 TVNZ's Sunday programme ran a report detailing an increase in persons leaving the Gloriavale Community. The persons interviewed for the show made allegations around enforced marriage, physical and sexual abuse, forced separation of families and a controlling environment.
- 3.2. A series of further reports on Campbell Live and in local and national newspapers saw increased disclosures of concerns around the Gloriavale community.
- 3.3. Following the media reports, Charities Services made an initial assessment and determined that the disclosures made could potentially constitute serious wrongdoing under the Act.⁸ In particular, Charities Services considered the alleged conduct could be considered a serious risk to the public interest and indicated financial and governance irregularities. Further information obtained during the assessment phase supported possible serious wrongdoing regarding financial irregularities.

s6(c)

⁷ A Christian community operating in India that is based on the same religious doctrines as the Gloriavale Community.

⁸ It is not unusual to open an investigation following media allegations/stories as it is within our mandate to ensure public trust and confidence in the charitable sector.

- 3.4. Charities Services liaised closely with the New Zealand Police who were supportive of Charities Services' intention to investigate the concerns within the Gloriavale Community. The New Zealand Police (**Police**) advised that unless people were willing to make a complaint and they obtained specific evidence of criminal offending, they could take limited action. They advised that the Gloriavale Community urged members to distrust Police.
- 3.5. Charities Services and the Police agreed that Charities Services is not the appropriate agency to investigate serious criminal offending and processes were established with the Police that if such disclosures were made within Charities Services inquiries, they would immediately be referred to the Police.
- 3.6. Whenever information was gathered during the investigation, Charities Services considered whether it was within the mandate of Charities Services or another agency, and where appropriate referred it to the relevant agency within the Joint Agency Approach (discussed below).

Joint Agency Approach

- 3.7. In addition to the media attention that surrounded leavers of the Gloriavale Community, by mid May 2015 it had become apparent that there were numerous indications and allegations of potential criminal offending being disclosed to Charities Services' investigators. This led to a request from Charities Services to the Police of 21 May 2015 to consider an all of Government approach to the Gloriavale investigation. This was to formalise the interagency flow of information and to ensure all appropriate agencies were equally informed around areas where they may have legal mandate in order to ensure the ongoing safety of the residents of the Gloriavale Community, particularly children that may be at risk. The Police were supportive of this approach and facilitated the involvement of the other Government agencies as contributing agencies.
- 3.8. s6(c)
- 3.9. Discussions between the Police and MSD led to the MSD being nominated as lead agency in the Joint Agency Approach.
- 3.10. The Joint Agency Approach was established in order to ensure the safety of all people, especially children living at the Gloriavale Community, to gather evidence of any criminal offending against individuals by members of the Gloriavale Community, to assess the continued suitability of the Trust to remain a registered charity, and to facilitate the ongoing engagement with, and education of, the members of the Gloriavale Community by appropriate agencies around agreed areas.

4. Issues & Purpose of the investigation

- 4.1. The purpose of Charities Services' investigation into the operation of the Trust was to determine whether the issues identified constitute serious wrongdoing as defined under section 4 of the Act being:
 - (a) an unlawful or corrupt use of the funds or resources of the entity;
 - (b) an act, omission, or course of conduct that constitutes a serious risk to the public interest in the orderly and appropriate conduct of the affairs of the entity;
 - (c) an act, omission, or course of conduct that constitutes an offence; and
 - (d) an act, omission, or course of conduct by a person that is oppressive, improperly discriminatory, or grossly negligent, or that constitutes gross mismanagement.

4.2. In addition to considering whether the Trust or any person associated with the Trust has engaged in serious wrongdoing, the purpose of the current investigation was also to determine whether the Trust is practising good governance and management under section 10(a) of the Act. Section 10(a) of the Act provides that one of the functions of Charities Services is *“to educate and assist charities in relation to matters of good governance and management, for example:*

- (i) *by issuing guidelines or recommendations on the best practice to be observed by charities and by persons concerned with the management or administration of charities:*
- (ii) *by issuing model rules:*
- (e) *by providing information to charities about their rights, duties, and obligations under this Act and other enactments”*

4.3. Taking into account the mandate of Charities Services under the Act and the stories published in the media, discussions with former members of the Gloriavale Community⁹ and other government agencies Charities Services identified the following issues were to form the basis of the investigation:

- Financial practices relating to members’ wages;
- Financial practices set up to facilitate theft/fraud;
- Funds being used for non-charitable purposes;
- Mismanagement in the form of conflicts of interest management;
- Coercion to hand over assets to the Trust;
- Those that leave the community do so with no assets;
- Members of the Gloriavale Community are forced to sign contracts with no informed consent;
- Marriages taking place without the consent of both parties;
- Abandonment of members that poses a risk to their well-being;
- Manipulation of members through their belief system;
- Separating family members as form of punishment; and
- Unsafe health and labour practices.

5. Evidence obtained during the course of the investigation

5.1. Charities Services undertook a full financial analysis of the information Charities Services gathered on the Trust’s finances and assessed the Trust’s activities to determine whether any of the activity of the Trust constitutes serious wrongdoing under the Act. As part of this, Charities Services reviewed the following information:

- a) Annual financial statements of the Trust from 2008 to 2015;
- s6(c)

⁹ Which occurred prior to the formal interviews of the Gloriavale Community’s former members.

s6(c)

- c) Interviews of eighteen former members of the Gloriavale Community: three members left around 14-20 years ago, two members left around 7 years ago and thirteen over the last 5 years;
- d) Interviews of several people who have regularly assisted leavers of the Gloriavale Community;
- e) Interviews of several people who have stayed at the Gloriavale Community either as guests or as providers of services;
- f) Interviews with s6(d)
- g) Open source information; and
- h) Information obtained from other government agencies.

5.2. In addition to the above Charities Services also interviewed the three current Trustees of the Trust being Enoch Upright, Fervent Stedfast and Howard Temple on 21 and 22 September 2016. Charities Services requested to interview Hopeful Christian due to his position of an Overseeing Shepherd and his power to appoint trustees. However, this request was declined by the Trust's solicitors stating that Hopeful Christian was not a trustee.

6. Referral of information to other Government agencies

6.1. Since the establishment of the Joint Agency Approach, Charities Services has regularly referred information to the members of the Joint Agency Approach that would be within their investigative mandate. This included:

s6(c)

- b) issues regarding school testing procedures being referred to the Ministry of Education; s6(c)

- d) information suggesting any criminal offending, including what is referred to other agencies, being referred to the New Zealand Police.

6.2. In addition to the above, issues regarding workplace health and safety and long working hours were referred to the Ministry of Business, Innovation and Employment (Labour Inspectorate) who were not a member of the Joint Agency Approach.

6.3. It should be noted that, although the above issues were referred to the appropriate agencies, Charities Services considered them where relevant in assessing whether or not the Trust or persons associated with the Trust have engaged in conduct amounting to serious wrongdoing.

7. Analysis

- 7.1. Prior to interviewing the Trustees it appeared to Charities Services from the allegations received (which are outlined in detail below) that the Trust and the persons associated with the Trust may have engaged in conduct that may result in serious wrongdoing as defined under the Act. Specifically in relation to: how the Trustees' deal with matters concerning signing of the Declaration of Commitment documents; assaults within the community; opening and operating of individual members bank accounts; shunning of members; treatment of members in the Shepherds and Servants meetings; the Trustees' dealings with leavers from the Gloriavale Community; and general governance issues.
- 7.2. Before Charities Services was able to make a final determination on whether the specific alleged conduct by the Trustees was serious enough to constitute serious wrongdoing under the Act and whether it warranted Charities Services taking any further compliance action, Charities Services provided the Trustees with an opportunity to respond to the specific allegations under investigation. This occurred on 21 and 22 September 2016 when Charities Services interviewed all three current Trustees of the Trust.
- 7.3. During these interviews the issues relating to management and governance and trustees' duties were addressed by all of the Trustees. The details of each of the allegations together with the Trustees' responses are detailed below together with any agreements that Charities Services and the Trustees reached during these interviews.
- 7.4. It should be noted that details of full allegations were provided to the Trust and its solicitors prior to the interviews taking place. As a result of this, the Trustees were able to prepare responses regarding improvements to the governance and management of the Trust based upon sound legal advice and present the proposed improvements to Charities Services at the interviews.
- 7.5. Although we note several of the matters discussed below would fall short of constituting serious wrongdoing under the Act, the Trustees wish to work with Charities Services towards a position of better governance. Accordingly, Charities Services took additional steps to support the Trust towards better governance.
- 7.6. This analysis section of the Investigation Report is separated into three sections. First we deal with the financial review of the Trust's financial affairs undertaken by Charities Services in order to determine whether the Trust or any person associated with the Trust had engaged in serious wrongdoing.
- 7.7. Second we address the various allegations of witnesses and complainants as well as information obtained from other government agencies in order to determine whether the Trust or any person associated with the Trust had engaged in serious wrongdoing.
- 7.8. Lastly, we address an additional issue identified dealing with the Trustees' duty to notify changes in Trustees under the Act.

Financial Review

- 7.9. In order to conduct a comprehensive financial review of the Trust's position, Charities Services reviewed a vast number of documentation and conducted a number of interviews with former members of the Gloriavale Community and other relevant persons.
- 7.10. From the financial review undertaken Charities Services has not identified any misuse of the Trust funds. The Trust's funds were found to be used in order to advance charitable purposes of the Trust.

s6(c)

- 7.12. In addition to the above, Charities Services also had concerns regarding the funding of the Christian Community in India. During the course of the previous investigation, the Trust advised that it did not provide any financial support to the Christian Community in India whatsoever. The Trust did however advise that funds may be provided to the Christian Community in India from the Gloriavale Members' personal funds. During the current investigation the Trust advised that the status of the money being sent to the Christian Community in India had not changed. Charities Services asked the Trustees at the interviews about this issue. The Trustees advised that the money used is held in a bank account called "Gloriavale Christian Community". The Trustees stated it was set up for Gloriavale Community members and it is a private and non-corporate account. The funds held in the account are the tax paid income of individuals and they are not controlled by the Trust. As a group, the Gloriavale individual members decide to send these funds to the Indian Community.
- 7.13. There are other accounts that the Trustees stated are run by the Gloriavale members and are separate from the Trust: called the "sharing accounts". These accounts pay for the food, clothing, laundry and medical costs of the Gloriavale community. The sharing accounts are funded by the personal income of members. Accordingly, the Trust does not include the food, clothing, laundry and medical costs of Gloriavale in its annual financial statements as it is viewed that the individual members cover these costs.
- 7.14. However, during the financial review, Charities Services noted that the three Trustees are signatories and operate the sharing accounts and the Gloriavale Christian Community account. The three Trustees maintain they are only signatories as they have the knowledge to deal with banking issues and that the accounts are independent of the Trust.
- 7.15. Charities Services has determined that the best course of action regarding the Trust's alleged independence of funding the Indian Christian Community and Gloriavale's food, clothing, laundry and medical costs is to perform an Assurance Check once the Trust files its next Annual Return in accordance with the New Reporting Standards for the financial year ended 31 July 2016. The Trust's Annual Return will need to be accompanied by the Trust's consolidated financial statements which will need to include financial information on all entities that are controlled by the Trust.

s6(c)

Allegations of Serious Wrongdoing

- 7.16. Beyond the issues covered by the financial review of the Trust, Charities Services' review of the information obtained during the course of the investigation indicated that the Trust and the persons associated with the Trust appear to have engaged in a pattern of actions mentioned in the Act's definition of serious wrongdoing.
- 7.17. Each of these allegations will now be discussed in detail below together with Charities Services' findings.

Structure and governance of the Trust

- 7.18. Charities Services has discussed with the Trustees allegations received from the witnesses when it comes to governance and management of the Trust. A number of witnesses were concerned that Trust decision making and meetings were not shared with the community, its beneficiaries. In addition to this, Charities Services had further concerns that there were no formal trust board meetings. Charities Services also had concerns regarding how decisions were made, and whether they were made consistently with the trustees' duties under the Trustee Act 1956 and the Trust Deed.
- 7.19. When it comes to decision making on behalf of the Trust, the Trustees advised that this is done by the Shepherds and the Servants at the Shepherds' and Servants' meetings and that once they are all in agreement regarding an issue, the Trustees would go ahead and ratify the decision. Because of their Christian beliefs discussions continued until all the Shepherds and Servants were in total agreement. As the Trustees would therefore be in total agreement upon a decision, ratifying the decisions as Trustees was easy.
- 7.20. In response to the concerns expressed by Charities Services regarding the structure and governance of the Trust, the Trustees advised Charities Services that they will appoint two additional internal trustees, from the younger people in the community, together with two external advisors. The two external advisors will consist of a local solicitor and a local business person that will attend all the Trustee meetings. The Trust will hold regular monthly Trustee meetings to allow the two external advisers to attend and advise on any relevant issues. The Trustees have further advised that they have decided to appoint the two external advisors in order to make sure that the Trustees act for the benefit of the Trust and that all decisions made by the Trustees are compliant with New Zealand laws.
- 7.21. Charities Services is satisfied that the appointment of the additional trustees together with the external advisors will alleviate the concerns that Charities Services had relating to the structure and governance of the Trust and will advise the Trust of this. Charities Services will however require the Trustees to notify us once these appointments have taken place.
- 7.22. Further to the above, Charities Services also enquired with the Trustees regarding Hopeful Christian's role within the Gloriavale Community due to the information contained in the media reports and information received from the interviews of former members that indicated that Hopeful Christian has a significant influence over the operation of the Trust. Charities Services was advised by the Trustees that his role is solely as a spiritual leader and that he does not make any day-to-day trustee decisions. After discussing with the Trustees how the Trust and the Gloriavale Community are governed in detail, Charities Services is satisfied with this response.

"What we believe" document and signing of the Declaration of Commitment documents

- 7.23. As noted earlier in this Investigation Report, each member of the Gloriavale Community is expected to assent to the set of doctrines known as "What we believe" which is the strict interpretation of the Christian Bible as decided by the Gloriavale Community Leaders.
- 7.24. Each member of the Gloriavale Community that wishes to marry and be a contributing member is also expected to sign The Declaration of Commitment.
- 7.25. The Declaration of Commitment document purports to hand over everything the signatory has or had ever received (or will ever receive) irrevocably to the Gloriavale Community. Moreover, the document purports to prevent the members ever bringing an action against the Gloriavale Community. This document is used as a justification by the Trust to obtain complete control over individuals' financial affairs, including operating bank accounts (additional banking authority is also signed) applying for passports and other government entitlements in their name.

- 7.26. Many of the former members interviewed alleged they were coerced into signing the document, and have further alleged that many of the youth in the Gloriavale Community are coerced into signing the document. Of the 11 leavers who left over the last 5 years, 9 signed before the age of 18, and one left before signing the document.
- 7.27. Former members have also alleged that members of the Gloriavale Community were also threatened with shunning, removal from the community with nothing and being prevented from future contact with family or friends if they did not comply by signing the Declaration of Commitment document.
- 7.28. Charities Services was also made aware of the allegations that the members who were minors had little option but to sign the Declaration of Commitment document if they wished to remain in the Gloriavale Community.
- 7.29. Charities Services has discussed the allegations with the Trustees regarding signing of the Declaration of Commitment documents by members of the Gloriavale Community.
- 7.30. The Trustees have acknowledged in the interviews that the procedures regarding signing of the Declaration of Commitment documents will need to be improved and that they will do this by having a lawyer attend and explain to each person the legal and financial implications of signing the Declaration of Commitment document. The members will also have an option to ask for further legal advice on their rights and obligations under the Declaration of Commitment Document. It was also pointed out by the Trustees that members of the Gloriavale Community were taught about "What We Believe" and the Declaration of Commitment documents from a very young age and that the young person was normally expected to approach the Leadership when they felt ready and willing to sign.
- 7.31. Charities Services is satisfied that the proposed process by the Trustees will satisfy Charities Services' concerns regarding the signing of the Declaration of Commitment document. This is because members of the Gloriavale Community will be able to make an informed decision as to whether they wish to sign the Declaration of Commitment document as they will be explained their rights and obligations relating to the same. Charities Services will however require the Trust to provide a copy of the Trust's documented policy outlining the procedures that will be followed when a person is to sign a Declaration of Commitment document. We have recommended the policy contains information on processes that will be followed if a person refuses to sign a Declaration of Commitment document.

Gloriavale Members' bank accounts

- 7.32. During the course of the current investigation Charities Services obtained the following information regarding opening of bank accounts by the Gloriavale Community members:
 - a) Seven of the former members of the Gloriavale Community interviewed have alleged that they never consented to, nor had knowledge of the Leadership's creation and use of individual members' bank accounts. Whether knowingly or not, each has signed their apparent consent on paper for a bank account to be opened in their name.
 - b) Eleven of the former members interviewed have also alleged that they did not consent to, or have knowledge of, the Leadership's control of individual members' subsequent financial resources or affairs, such as receiving salaries, claiming benefits, making donations and paying tax.
 - c) Four of the former members of the Gloriavale Community have alleged that after they left the Gloriavale Community funds were removed from their personal bank accounts without their permission.
- 7.33. Information obtained from bank records confirms the activity alleged by the former members interviewed.

- 7.34. Charities Services made enquiries with the Bank of New Zealand (**BNZ**) regarding the procedures that are taking place when a new bank account is being opened for a member of the Gloriavale Community. BNZ confirmed that historically bank staff have attended the Gloriavale Community to open and process accounts for large groups of people.
- 7.35. Following Charities Services enquiries and concerns expressed with their procedures regarding accounts of individual members of the Gloriavale Community, BNZ has reviewed their processes regarding opening accounts for members. Under the newly implemented procedures, each member of the Gloriavale Community that attends a branch of BNZ to have an account opened will be seen individually without any Shepherds or Servants present. BNZ staff members will then explain to them what a bank account is, what an EFTPOS card is and who can have access to their account.
- 7.36. The newly implemented procedure by BNZ was also confirmed by the Trustees at the interviews.
- 7.37. Charities Services is satisfied with the newly established procedures for opening a bank account for individual members of the Gloriavale Community and will not require any further action from the Trust regarding the same.

"Putting Out" or "Hutting" of members

- 7.38. Five of the former Gloriavale Community members interviewed have alleged that once they informed the Leadership they were considering leaving the Gloriavale Community they were subjected to punishments as a form of deterrent which included detention in isolated and sometimes dilapidated properties without their consent.
- 7.39. Former members have also alleged that other members who are still living at the community have also been put in detention by the Leadership for breaching other rules of the Gloriavale Community.
- 7.40. Charities Services discussed allegations with the Trustees regarding "putting out"¹⁰ or "hutting" of the members and the conditions of the 'huts' in which they were required to stay.
- 7.41. The Trustees noted that they had never heard that "putting out" was referred to as "hutting". They advised that removing members from the Gloriavale Community was simply a time for them to reflect on their actions (if they broke community rules) or whether they still wished to stay at the community. The Trustees have further advised that this was not a punishment. They no longer use the hut, as they have a farmstead building at Bell Hill and a house in Nelson Creek. Further to this, one of the Trustees, Enoch Upright, has stated that he stayed in, the "Shearer's Hut", when they were short on housing and indicated that it was not nearly as inadequate as described by the former members.
- 7.42. Charities Services has received corroborative information from a recent leaver that the use of the shearer's hut has ceased in preference to the properties at Bell Hill and Nelson Creek.
- 7.43. As agreed at the interviews, the Trustees will provide Charities Services with a copy of their policy dealing with the circumstances in which it would be considered appropriate to 'put out' a member from the community and how these putting outs will be handled by the Leadership.

Complaints to the Trustees regarding physical and sexual assaults at the Gloriavale Community

- 7.44. Charities Services referred all physical and sexual assault allegations to the Police. Charities Services has not made any specific enquiries relating to such assaults from the Trustees but has enquired as to how they have handled allegations of such assaults in terms of governance and management responsibilities.

¹⁰ The term used by the Trustees.

7.45. s6(c)

- 7.46. It has been alleged by a number of former members of the Gloriavale Community interviewed that community members have been sexually assaulted and are exposed to an ongoing risk of sexual assault, possibly increased by a lack of safeguarding action by the Trustees. Five female leavers have alleged that they were victims of sexual crimes.
- 7.47. It was also alleged that community members have been sexually assaulted, often by the same offender/s, and they have further alleged that the Leadership were aware and blamed the victims, failed to take action, or took insufficient action.
- 7.48. Two women from outside the community have also allegedly been victims of sexual assault by the same alleged offender from within the community and it is further alleged the Trustees did not deal with the issue appropriately. Two of the leavers provided information that some of the Trustees were aware and involved with dealings with the second victim.
- 7.49. In addition to the sexual assaults noted above, it has been alleged by all of the former members interviewed that community members are exposed to physical punishment and ongoing risk of physical assault. It has been alleged that this is a result of Leadership both permitting and condoning this action.
- 7.50. Specifically, allegations have been made that community members have been beaten and struck with objects by parents, teachers and elders. Some of these were historical allegations and some more current allegations. Four of these allegations were from people who have been beaten and struck themselves. Other leavers have alleged they were aware of such incidents occurring at the Gloriavale Community, without directly observing them.
- 7.51. Charities Services has discussed with the Trustees their duties regarding the handling of allegations of physical and sexual assaults at the Gloriavale Community. The Trustees have all acknowledged that they have a responsibility regarding physical and sexual assaults within the community.
- 7.52. The Trustees advised Charities Services at the interviews that they will implement a policy on how they will deal with allegations of physical and sexual assaults at the Gloriavale Community. Such a policy will include that if a member of the community is a persistent threat to other members that they will be expelled from the Gloriavale Community and that local police will be informed in order to warn and protect the wider local community.
- 7.53. The Trustees have also advised that the Leadership has sent out a clear message to the members that the anti-smacking laws apply inside the community. A recent leaver has confirmed this and noted that this is adhered to within the community.
- 7.54. The Trustees have further advised that ten couples who are parents within the community have completed a ten week parenting course called Incredible Years, delivered by the Ministry of Education. This class upskills the parents within the Gloriavale Community on the current anti-smacking laws and teach them how to build relationships with their children as well as other parenting skills. The Trustees noted the success of this course and have therefore ensured it will be ongoing training within the Gloriavale Community. To this end, two members of the community attended additional training in Auckland to qualify as facilitators for the course and all the requisite training aids and materials have been purchased by the Trust. Charities Services was also made aware that a child psychologist retiring from a full-time role at the Ministry of Education has accepted a contract to oversee the ongoing Incredible Years training within the Gloriavale Community over the next couple of years.
- 7.55. Charities Services will require the Trust to provide a copy of the policy dealing with physical and sexual assaults within the community as well as a policy regarding the parenting education.

Education at the Gloriavale Community

7.56. s6(c)

7.57. Charities Services was made aware of allegations by the former members that they were denied any choice or opportunities to further education or to follow a desired career path.

7.58. The "What We Believe" document appears to corroborate that, at age 15, young persons are expected to finish their education and take up employment.

7.59. Further to the above, a former member has also alleged that there were issues with the testing procedures at the community with students sometimes being given answers to tests.

Working conditions at the Gloriavale Community

7.60. s6(c)

7.61. When it comes to the working conditions of members' working at the Gloriavale Community, former members have alleged that members were:

- a) Compelled and coerced to work excessive hours;
- b) Given no choice but to work in allocated jobs;
- c) Not told of their employment status and rights, and not allowed to change their own employment status or conditions of work; and
- d) Received effectively no payment for their work and were unaware that some funds were allocated to an account they did not know existed nor could access during their time in the Gloriavale Community.

7.62. Further to the above, former members have alleged that women and girls were discriminated against by being denied a right to do anything other than what the Leadership considered "women's work". This included cleaning, food preparation, childcare and midwifery. This was also confirmed by investigators who visited the Gloriavale Community and by information available in the public domain.

7.63. Many of the above allegations appear to have a premise by reference to the "What We Believe" document.

7.64. The Trustees have advised that members of the Gloriavale Community that are of working age are all self-employed and their services were subcontracted by Christian Partners to the Gloriavale companies or the school.

Forced Marriage

7.65. Charities Services was also made aware of allegations by former members of the Gloriavale Community that young men and women are compelled and coerced into marriage, determined by the Leadership. In some instances it was alleged that members that are coerced into marriage do not want to get married.

7.66. Charities Services has discussed the above allegations with the Trustees and were advised that no one is forced to get married if they do not wish to get married. Members are advised by the Leadership that it is "God's will" for them to get married and it is up to the individual members to decide whether they wish to proceed with it.

7.67. Charities Services is satisfied with the Trustees' responses and will therefore not require any further action from the Trust regarding the same.

Leaving the Gloriavale Community

- 7.68. Former members of the Gloriavale Community that were interviewed by Charities Services have alleged that they are not provided with sufficient means to support themselves when leaving the Gloriavale Community and that the Trustees are failing in their perceived duty of care to assist leavers' transition to outside life. The Trustees are allegedly relying on the Declaration of Commitment document in that leavers have no claim to any assistance from the Trust or the Gloriavale Community once they leave as it proves that the signatories "will never at any time claim anything back for" themselves, their relatives or anything else.
- 7.69. Former members have also alleged that they were subjected to intense psychological pressure to make them remain at the Gloriavale Community. They have alleged that members who inform the Trustees that they are considering leaving the Gloriavale Community are subjected to punishments as a form of deterrent. Leavers have alleged that they were subject to prolonged "Servant and Shepherds Meetings" (which is discussed in detail further below), detention in isolated and sometimes dilapidated properties; separation of family members, and room detention.
- 7.70. Charities Services discussed the allegations with the Trustees at the interviews regarding the above issues. The Trustees advised that there was always a verbal policy on how leaving the Gloriavale Community was to be handled. The Trustees have also acknowledged during the interviews that they 'may have got it wrong' a few times in the past as it was always a highly emotional time for all involved but that these processes have been improved and they are in the process of capturing the same in writing.
- 7.71. In addition to the above Trustees have also provided Charities Services with examples where they provided leavers with support which included payment of schools fees for a young leaver who they also assisted in travelling to Australia. Another leaver was provided with three months' salary once they left the community.
- 7.72. Further to the above, former members have also alleged that once they leave the Gloriavale Community they are denied all contact with their family or access to the community.
- 7.73. Charities Services has discussed this allegation with the Trustees who have advised that they have never stopped leavers from having such contact. In a lot of instances, the Trustees have noted, the family themselves would not want to speak to the leaver. They have further confirmed that the leavers can visit the Gloriavale Community and attend the community's Sunday service as long as they comply with the rules of the community and do not challenge the beliefs of the members. The Trustees stated that there is no policy of "shunning" or permanently excluding a leaver.
- 7.74. The Trustees have agreed to provide Charities Services with a written policy as to how leaving of members will be handled, how they will be assisted in their leaving and that they will have the opportunity to keep in contact with the friends and family that remain at the Gloriavale Community.

Servants and Shepherds Meetings

- 7.75. Former members have alleged that if the Leadership considered that a member had committed a breach of the Gloriavale Community rules they would be summoned into a Servants and Shepherds meeting.
- 7.76. At this meeting, they alleged the Servants and Shepherds would shout insults and accuse them of the breaches of the rules. Former female members alleged that the Leadership in these meetings would refer to them as "sluts", "whores" and "being evil". Leavers have also alleged that youth as young as 13 to 15 years of age are subjected to these meetings.

- 7.77. Charities Services discussed the allegations with the Trustees relating to these meetings. The Trustees acknowledged that these meetings have often been very emotional but that they were addressing these issues.
- 7.78. The Trustees have advised that they will change how Servants and Shepherds meetings are run in the future, that the number of Servants and Shepherds attending the same will be reduced, and that the person summoned into the meeting will be able to have a support person with them as well as their family members.
- 7.79. Charities Services will require the Trust to provide a copy of a written policy outlining how such Shepherds and Servants meetings will be run confirming the Trustees' advice.

Additional Issue

- 7.80. In addition to the issues identified above during the course of the investigation, the Trust has breached section 40 of the Act by not notifying Charities Services of change in the Trustees of the Trust regarding Steady Standtrue who died in 2015.
- 7.81. This issue was brought to the attention of the Trustees who confirmed there had been an oversight but they have rectified the same and now filed a notice of change under section 40 of the Act to remove late Steady Standtrue as a current Trustee of the Trust.

8. Conclusion

- 8.1. Charities Services considers that the Trustees' conduct towards members of the Gloriavale Community does not constitute good governance or management and would not promote public trust and confidence in the charitable sector.
- 8.2. Charities Services also considers that before the current investigation into the operation of the Trust was opened, the Trustees may have acted in a manner that may constitute serious wrongdoing under the Act. This is especially so when it comes to the Trustees responsibilities regarding handling of members wishing to leave the Gloriavale Community, members breaching the rules of the community, handling of allegations of physical and sexual assaults within the community as well as dealings with breaches of the rules of the community.
- 8.3. As already noted previously within this Investigation Report, Charities Services has only dealt with and addressed matters with the Trustees that are within ambit of Charities Services. All other issues have been referred to the appropriate agencies under the Joint Agency Approach Terms of Reference as well as to s6(c). Charities Services was advised by some of these agencies that they have either opened a current investigation into the matters as a result of our referral or that they will open an investigation in the future. Some of the agencies, such as the Ministry of Education, have already engaged with the Trust in order to improve parenting skills within the community.
- 8.4. During the interviews, the Trustees acknowledged that they need to improve their processes and procedures and how they deal with issues concerning individual members within the community. While the Trustees have advised that their policies and procedures have always been "oral", the Trustees have agreed that these policies and procedures will be improved and documented and that copies of the same will be forwarded to Charities Services for comment. In particular the Trustees will provide Charities Services with the following:
 - a) A notification of change regarding appointment of two additional Trustees;
 - b) A notification of appointment of two independent advisors to the Trustees;
 - c) A policy outlining updated procedure of dealing with individual members signing the Declaration of Commitment documents;

- d) A policy dealing with “putting out” of members which should include the circumstances in which members may be “put out” and what processes will be followed regarding this practice;
 - e) A policy as to what procedures the Trustees will follow when they are made aware of allegations of physical or sexual assaults occurring within the Gloriavale Community;
 - f) A policy as to how members wishing to leave the Gloriavale Community will be treated and what assistance will be offered to them once they leave the community; and
 - g) A policy on how the Shepherds and Servants meetings dealing with potential leavers or rule breakers will be run.
- 8.5. After completing the Trustee interviews Charities Services has considered the information obtained at the interviews and the agreements reached with the Trustees regarding documenting specific policies that will be implemented when it comes to the operation of the Gloriavale Community.
- 8.6. Charities Services considers that it is in the public interest for the Trust to remain on the Charities Register. This is because:
- a) Any potential serious wrongdoing identified during the course of the current investigation that is within Charities Services’ ambit will be rectified by the Trustees;
 - b) Other alleged serious wrongdoing that is outside of Charities Services’ ambit has been referred to the appropriate government agencies for investigation;
 - c) The initial investigation into the operation of the Trust had indicated that the Trust does advance religion and provides sufficient public benefit and therefore is eligible for registration as a charitable entity under the Act;
 - d) Not removing the Trust from the Charities Register will allow Charities Services to further engage in the Trust and monitor their obligations under the Act which will in turn be more beneficial to the members living within the Gloriavale Community.
 - e) The majority of leavers who provided information to Charities Services did not want the current investigation to result in the deregistration of the Gloriavale Community but sought changes to benefit those still living in the community. Some leavers said that if the changes were significant they might consider returning to live in the community themselves.
- 8.7. Charities Services considered whether it would be appropriate to issue the Trust with a warning notice under section 54 of the Act. Charities Services determined however that due to the high level of cooperation and genuine interest of the Trustees to act in the best interest of the Trust and the members of the Gloriavale Community, it would not be appropriate to issue the Trust with such a warning notice at this stage. In addition to this, Charities Services acknowledges that the Trustees have obtained legal advice regarding the allegations under investigation and that such advice was instrumental in the Trustees’ cooperation with Charities Services and the positive outcome achieved in the current investigation.
- 8.8. Charities Services has therefore determined that the most appropriate outcome for the current investigation is for Charities Services to continue to engage with the Trust and assist them in implementing policies that will improve the governance and management of the Trust.

9. Recommendations

- 9.1. After considering all of the above, Charities Services has determined that the most appropriate action is to send the Trust a notification letter outlining all matters and actions agreed upon at interviews with the Trustees and give the Trust a timeframe within which the items agreed upon will need to be provided to Charities Services. This letter will also include advice of their obligations under the New Reporting Standards regarding their controlled entities.
- 9.2. If the Trust does not provide Charities Services with what was agreed to at the interviews, Charities Services may take further compliance action which may involve opening a new investigation into the operation of the Trust. Charities Services considers this information is necessary to assess, on an ongoing basis, whether the Trust or anyone associated with the Trust may be engaged in conduct that could constitute serious wrongdoing under the Act.
- 9.3. Further to the above, Charities Services will actively keep in contact with government agencies involved in the Joint Agency Approach and if determinations of their investigations show that serious wrongdoing, as defined under the Act, has occurred; Charities Services may take further compliance action which may involve opening a new investigation into the operation of the Trust.
- 9.4. In addition, Charities Services will also make sure that the Trust's Annual Return that is due to be filed by 31 January 2017 for the financial year ending 31 July 2016 complies with the New Reporting Standards.
- 9.5. Finally, Charities Services will continue to monitor the activities of the Trust and will offer support or advice if such is required by the Trust.

RELEASED UNDER THE
OFFICIAL INFORMATION ACT

People Leaving Gloriavale or Wanting to Return to Gloriavale

General Principles

1. Gloriavale Christian Community was not established as a self-sufficient lifestyle, or a rural retreat. It was established for those wanting to deny themselves, and take up their cross daily, and follow the Lord Jesus Christ according to every teaching and commandment of the New Testament, just as His disciples did when he was here on earth. It means loving God with all our heart, and mind, and soul, and strength; and loving one another as ourselves, even as Jesus loved us and gave Himself for us. It means seeking unity in all things, renouncing the love of money and personal ownership, having all goods in common and providing for others equally as well as ourselves. It means a life of purity with sexual relationships only within life-long marriages, not loving the pleasures of this world, esteeming others better than ourselves, submitting ourselves one to another, and much more besides. Such a life requires total commitment, for in it we are dealing not only with flesh and blood, but also with spiritual forces of good and evil which operate in many areas of our life, including that of people joining, leaving or returning to Gloriavale.
2. No-one is compelled to live at Gloriavale against their will, and they are free to leave if they so choose. It would destroy our faith and unity and harmony and love for one another to try and make them stay here against their will. But when people choose to leave Gloriavale without the blessing of the Church, they are choosing to turn away from our faith, which will inevitably affect their future relationships with those who choose to live within Gloriavale and to retain our faith.
3. If any member persistently transgresses this faith in word or deed and affects others thereby, in spite of being often spoken to, then, according to the teaching of the Lord Jesus Christ and His apostles, which we have chosen to follow, that person would have to leave Gloriavale,
4. If people who have left or been asked to leave Gloriavale wish to return, they may do so if they are willing to believe and abide by the Agreed Standards of our New Testament faith.

Principles of Our Faith

1. **Agreed Standards.** Membership of Gloriavale Christian Community ("Gloriavale") is entirely voluntary, and is only for those who choose to believe and abide by our faith and way of life as stated in the following, together known as "Agreed Standards":
 - a. The **Declaration of Commitment to Jesus Christ and His Church & Community at Gloriavale** (Adult commitment to live as part of the Church and Community at Gloriavale)
 - b. **Clause 1. of The Christian Church Community Trust DEED** (Clause 1 is copied below in red, and is also part of the Declaration of Commitment):
1. The Christian Church Communities (Clause 1. of the Trust Deed)
 - a. The Christian Church Communities are those Christian Church Communities governed, owned or administered by the Trust which fulfil all of the following conditions:

- i. They believe and abide by every clause of the declaration of faith "What We Believe" (as amended from time to time).
 - ii. They willingly accept in full the guidance, care and authority of the Overseeing Shepherd (together with the shepherds in each Christian Church Community under him) as all teach according to the clear commandments of the New Testament.
 - iii. They forsake all, separate themselves from ungodliness, and live together in love and purity of life, with one heart and one mind, as the Church and Community of Jesus Christ in their location, and have all things common.
 - iv. They pool all their resources with the other Christian Church Communities under this Trust, including in particular all land, buildings, livestock and other assets necessary for community life, such resources to be administered and operated under the Trusts herein so as to live in unity, equality and love with all the other Christian Church Communities.
- b. Any person, regardless of background, who complies with all the conditions in clause 1.a may be accepted to live within a Christian Church Community and enjoy the benefits of its resources, including those described in clause 1.a.iv, but no person who does not so comply, or who leaves a Christian Church Community (unless sent forth by the shepherds with their blessing) has any right to enjoy any of those benefits.
2. **Particular Relevant Scriptures.** There are a number of particular teachings of our Lord Jesus Christ and his apostles concerning the relationships between those who are walking in faith and those who are not, and between those who go out from the Church without its blessing and those who remain within it. Different transgressions arise and people have different motivations of heart and they often need to be treated in different ways. Following are a range of Scriptural responses to these different situations, so that we may in wisdom, experience, and the leading of the Holy Ghost, deal with each different situation appropriately:
- a. "If any man see his brother sin a sin which is not unto death, he shall ask, and he shall give him life for them that sin not unto death. There is a sin unto death: I do not say that he shall pray for it. All unrighteousness is sin: and there is a sin not unto death."
1 John 5:16, 17.
 - b. "Brethren, if a man be overtaken in a fault, ye which are spiritual, restore such an one in the spirit of meekness; considering thyself, lest thou also be tempted." Galatians 6:1
 - c. "Moreover if thy brother shall trespass against thee, go and tell him his fault between thee and him alone: if he shall hear thee, thou hast gained thy brother. But if he will not hear thee, then take with thee one or two more, that in the mouth of two or three witnesses every word may be established. And if he shall neglect to hear them, tell it unto the church: but if he neglect to hear the church, let him be unto thee as an heathen man and a publican." Matthew 18:15-17. (Spoken by Jesus to people brought up as Jews, to whom His last sentence meant not to keep company with such a person, nor to eat with him).

- d. "And the servant of the Lord must not strive; but be gentle unto all men, apt to teach, patient, in meekness instructing those that oppose themselves; if God peradventure will give them repentance to the acknowledging of the truth; and that they may recover themselves out of the snare of the devil, who are taken captive by him at his will." 2 Timothy 2:24-26.
- e. "And if any man obey not our word by this epistle, note that man, and have no company with him, that he may be ashamed. Yet count him not as an enemy, but admonish him as a brother." 2 Thessalonians 3:14,15.
- f. "Mark them which cause divisions and offences contrary to the doctrine which ye have learned; and avoid them." Romans 16:17
- g. "Now we command you, brethren, in the name of our Lord Jesus Christ, that ye withdraw yourselves from every brother that walketh disorderly, and not after the tradition which he received of us" 2 Thessalonians 3:6.
- h. "These things speak, and exhort, and rebuke with all authority. Let no man despise thee." Titus 2:15.
- i. "Against an elder receive not an accusation, but before two or three witnesses. Them that sin rebuke before all, that others also may fear." 1 Timothy 5:19,20.
- j. "A man that is an heretick after the first and second admonition reject." Titus 3:10
- k. "I wrote unto you in an epistle not to company with fornicators: yet not altogether with the fornicators of this world, or with the covetous, or extortioners, or with idolaters; for then must ye needs go out of the world. But now I have written unto you not to keep company, if any man that is called a brother be a fornicator, or covetous, or an idolater, or a railer, or a drunkard, or an extortioner; with such an one no not to eat... that the spirit may be saved in the day of the Lord Jesus... Know ye not that a little leaven leaveneth the whole lump? Purge out therefore the old leaven, that ye may be a new lump, as ye are unleavened. Therefore put away from yourselves that wicked person" 1 Corinthians 5:9-11,5-7,13.
- l. "Sufficient to such a man is this punishment, which was inflicted of many. So that contrariwise ye ought rather to forgive him, and comfort him, lest perhaps such a one should be swallowed up with overmuch sorrow. Wherefore I beseech you that ye would confirm your love toward him." 2 Corinthians 2:6-8
- m. "Likewise, I say unto you, there is joy in the presence of the angels of God over one sinner that repenteth.... And he [Jesus] said, A certain man had two sons: and the younger of them said to his father, Father, give me the portion of goods that falleth to me. And he divided unto them his living. And not many days after the younger son gathered all together, and took his journey into a far country, and there wasted his substance with riotous living. And when he had spent all, there arose a mighty famine in that land; and he began to be in want. And he went and joined

himself to a citizen of that country; and he sent him into his fields to feed swine. And he would fain have filled his belly with the husks that the swine did eat: and no man gave unto him. And when he came to himself, he said, how many hired servants of my father's have bread enough and to spare, and I perish with hunger! I will arise and go to my father, and will say unto him, Father, I have sinned against heaven, and before thee, and am no more worthy to be called thy son: make me as one of thy hired servants. And he arose, and came to his father. But when he was yet a great way off, his father saw him, and had compassion, and ran, and fell on his neck, and kissed him. And the son said unto him, Father, I have sinned against heaven, and in thy sight, and am no more worthy to be called thy son. But the father said to his servants, bring forth the best robe, and put it on him; and put a ring on his hand, and shoes on his feet: And bring hither the fatted calf, and kill it; and let us eat, and be merry: for this my son was dead, and is alive again; he was lost, and is found. And they began to be merry." Luke 15:10-24.

People Wanting to Leave Gloriavale or Being Required to Leave Gloriavale.

Procedures

1. On each hostel floor there is a Shepherd and a Servant who are well known to the people and care for them, have a positive relationship with them, and whom the people can approach freely.
2. If the Trust Board becomes aware that someone wants to leave Gloriavale or is acting and speaking contrary to our Agreed Standards, the Board will generally arrange, as a first step, for a "group of 3" (about 3 shepherds or servants, but sometimes including a relative or other person) to visit that person privately and discuss:
 - a. Why they want to leave, or why they are acting and speaking unacceptably.
 - b. Any particular problems they have.
 - c. Possible solutions to help them, and
 - d. Whether they have considered the consequences of leaving.

At this meeting, the person being spoken to will be advised that he or she is fully entitled to a support person, such as their own shepherd or servant, or a respected member of the community, or a friend or someone else who knows what is in their mind, to sit beside them in that and any subsequent meetings, not to argue their case, but neutrally, if needed, to help present what that person wants to say, or what the other people are saying to that person. The group of 3 will give them time to think things over and then revisit them to see if they are of the same mind or otherwise.

3. Depending on the outcome, the person wanting to leave may decide to do so immediately, or to talk further with the group of 3, or meet for counselling with all the shepherds and servants, and similarly with any person acting or speaking unacceptably.
4. Issues that could be raised by the Group of 3 or by the Shepherds and Servants include::
 - a. Reminding them of their Declaration of Commitment, and how leaving will affect them spiritually, socially, mentally, and with regards to employment.
 - b. How their leaving would affect their family and their relationship with their family.
 - c. Financial issues.
 - d. New issues to face in life outside Gloriavale.

5. Other important matters include:

- a. Parents, family members, or other relevant people may be asked to attend.
- b. After any meeting, the person(s) will be given time to think things over if they so desire.
- c. In the shepherds and servants meetings, a mature, responsible, and well respected person will be appointed to ensure that the everything is done in a godly, orderly and acceptable manner, without undue pressure, and that everyone, including the person(s) concerned , is given due respect and a fair opportunity to speak.
- d. If appropriate, the person concerned may be freed from normal commitments and responsibilities to live apart for a period of time in suitable accommodation with food provided, and if appropriate, with a support person there also to pray and think things over, and to reflect and decide what is the best thing to do. It would be inappropriate for a person under 18 year to do this without a parent or other suitable person being with him/her.
- e. The shepherds and servants will share in love and humility with the person concerned, that although God has given them a free will to choose whether or not they will live at Gloriavale according to our Agreed New Testament Standards, their eternal salvation will be endangered if they choose to leave the church that Jesus has called together in this place , or are required are required to do so because of their transgression. Nevertheless, it will be clearly acknowledged that it is entirely up to that person to decide what he or she wants to do, and no pressure will be put upon him or her by the Shepherds and Servants regarding that decision.
- f. It will also be made clear, in love and humility, that if, after being spoken to according to the Agreed Standards of our New Testament faith, the person still chooses to leave the Church and Community, or is required to do so for persistent and unchanging transgression of the Agreed Standards, then the members of this Church will be bound by the commandments of the Lord Jesus Christ and His apostles to no longer keep company or eat with that person, who would no longer be considered a part of the Community . The New Testament reasons given for this are two-fold, that:
 - i. The person may come to repentance and the saving of his or her soul, which is our hope and desire, like the Prodigal Son in Jesus' account as in (m.) on page 3, or the man in (k.) and (l.) on page 3.0` (If this comes to pass, then that person would be accepted back with joy into permanent fellowship at Gloriavale).
 - ii. The person cannot continue to spread ideas and practices amongst us which are contrary to the Agreed Standards of our New Testament faith and which could affect others negatively, and so break down the love and unity and purity of the church of Jesus Christ at Gloriavale, even as a little leaven in a lump of dough affects the entire lump.
- i. If the person does leave or is required to leave Gloriavale, he or she will be treated with the respect and consideration due to every person, regardless of their beliefs and way of life. Any necessary business or other arrangements will be made courteously and politely, for it is that person's right in this life to live according to his or her own beliefs and to manifest the religion of his or her own choice. But as acknowledged by The New Zealand Bill of Rights Act 1990, it is equally our right at Gloriavale to live according to our beliefs and to manifest

the religion of our choice, which includes not keeping company with nor eating with such a person, and it is not any other person's right to demand or pressurise us otherwise.

Procedures Upon Leaving Gloriavale

If, after counsel, the person still chooses or is required to leave Gloriavale, the following will be dealt with:

- a. Resignation from Christian Partners (if a Partner), advice about concluding existing taxation and ACC liabilities, how to take responsibility for handling these affairs themselves and any different taxation and ACC requirements that are likely to apply.
- b. Providing current details & balance of any bank A/c in their name, and cancelling any procedures previously authorized by that person for the Financial Controller to administer their bank account
- c. For self-employed Christian Partners, arrange for delinking from our Haupiri Net Ltd Tax Agency after their taxation matters are finalised concerning income already earned at Gloriavale, and likewise for any ACC levies due.
- d. Provide a gift of money, relative to their circumstances, family etc.
- e. Provision of travel to their chosen destination within New Zealand.
- f. Parents complete the required cancellation of enrolment of their children from the Gloriavale Christian Community School and early childhood centres.
- g. Ensure that the person has fulfilled any current responsibilities within or without Gloriavale.
- h. Give the person any of the following that are held in the School or Community office or elsewhere:
 - i. Passport
 - ii. Birth & Marriage Certificates
 - iii. IRD Number
 - iv. National Health Index (NHI) number
 - v. Community Services Card or Gold Card or details of the same
 - vi. 18 Plus card
 - vii. School or tertiary qualification documents
 - viii. National Student Number (NSN)
 - ix. Information about how to access their Record of Learning from NZQA website.
- i. Establishing a clear understanding and basis for any return to Gloriavale.

People Wanting to Return To Gloriavale

The most significant factor determining whether any ex-member would be received back at Gloriavale for a visit or permanently, is the attitude of that person. If the person acts offensively or disruptively, or is determined to continue living in a way that they know is contrary to our faith, or acts, speaks or dresses in defiance of what we believe or our in defiance of our established way of life, or criticises our leaders and teachings, or tries to influence any of us in any way against any of our beliefs or practices, or tries to persuade people to leave Gloriavale, or comes in amongst us secretly without making proper prior arrangements, or refuses to leave when asked to do so, then the commandment to not keep company or eat with that person would continue to apply.

If there is evidence of a genuine change of heart, of a turning away from wrong doing and an end to all negative influences towards us, as itemised below, then we would consider more contact with such a person on a case by case basis, including contact by telephone, by actual visits to Gloriavale, by attending our public Christian meetings on the first day of the week, or our concerts.

Any return to Gloriavale, whether as a visit or on a more permanent basis, would be subject to prior arrangement with one or more of our shepherds.

Any temporary visit to Gloriavale by any person who had chosen to leave or been required to leave would depend upon the attitude and behaviour of the person) wanting to visit, including:

- a. Coming in a peaceful, non-disruptive and non-offensive manner.
- b. Not eating with people at Gloriavale if asked not to do so.
- c. Respecting our faith and way of life including wearing modest clothes, refraining from swearing, using unacceptable language and causing offense to any person or principle of our life.
- d. Leaving peacefully whenever asked to do so by parents or Gloriavale leaders.
- e. Not trying to influence anyone at Gloriavale in any way against any of our beliefs, practices or ways of life, and not trying to influence anyone to leave Gloriavale.
- f. Not leaving or distributing any books, writings, music, films, food, beverages, drugs, electronic devices, or any other thing within Gloriavale without the approval of their parents, grandparents, or Gloriavale leaders.
- g. Honouring, respecting and obeying their parents, their grandparents, and the Community leaders.

Any Permanent Return to Gloriavale. Our prayer and desire is that all who have left Gloriavale or been required to leave Gloriavale would repent of and forsake their previous wrong doing, and return in humility like the Prodigal Son, desiring to be of one heart and mind with us, to embrace all the Agreed Standards of our New Testament faith and renew their Declaration of Commitment to Jesus Christ and His Church at Community at Gloriavale, or make such a Declaration if they had not previously done so. Such a permanent return would be subject to an initial meeting with the leadership at Gloriavale, complying with whatever decisions they make, and then giving their lives in service to Christ and to all the other members of the Community.

No Unconditional Right of Entry

Nothing in this document gives any previous member of Gloriavale Christian Community any unrestricted right to enter any part of the Gloriavale Christian Community, or to enter any other land or property owned or administered by The Christian Church Community Trust without first gaining approval to do so from one of the Trustees, or in their absence, from another Shepherd or Servant of the Gloriavale Christian Church and Community.

The Christian Church Community Trust – Sundry Policies

Discussions About What We Believe

If any person has a genuine question, concern, or uncertainty about anything we believe, or any such issue, they may certainly ask for clarification, and one or more of the Shepherds will give them an honest and sincere answer. Our desire is to follow the Word of God revealed in the New Testament, and this is the basis of what we believe. If any person has a genuine desire for the truth we will discuss with them the relevant scriptures to help them come to a better understanding of the Word of God. However, we wish to avoid contentions and debating scriptures with people who have a spirit that opposes the beliefs of the Church. In accordance with our teachings of unity as expressed strongly in the New Testament, we do not encourage people to be individually evangelising members of the Church to beliefs that are obviously different from those upon which the Church is founded.

In cases where the Church is led by the spirit of God to refine our beliefs on a certain topic, the scriptures can be discussed openly and freely in order to bring understanding and unity to the congregation. Once again, our question is: "What does the Word of God teach us about this?"

We cannot accept or allow any strife or contention within the Church, for this is forbidden by the Word of God, and is contrary to our basic faith, to the Prayer of the Lord Jesus Christ before He went to the Garden of Gethsemane to be betrayed by Judas, and to the entreaty of the apostle Paul:

"Fulfil ye my joy, that ye be likeminded, having the same love, being of one accord, of one mind. Let nothing be done through strife or vainglory; but in lowliness of mind let each esteem other better than themselves" Philippians 2: 2,3.

"For ye are yet carnal: for whereas there is among you envying, and strife, and divisions, are ye not carnal, and walk as men?" 1 Corinthians 3:3

"Now the works of the flesh are manifest, which are these; adultery, fornication, uncleanness, lasciviousness, idolatry, witchcraft, hatred, variance, emulations, wrath, strife, seditions, heresies, envyings, murders, drunkenness, revellings, and such like: of the which I tell you before, as I have also told you in time past, that they which do such things shall not inherit the kingdom of God."
Galatians 5:19-21

"These words spake Jesus, and lifted up his eyes to heaven, and said, Father, the hour is come; I pray for them... That they all may be one; as thou, Father, art in me, and I in thee, that they also may be one in us: that the world may believe that thou hast sent me. And the glory which thou gavest me I have given them; that they may be one, even as we are one: I in them, and thou in

me, that they may be made perfect in one; and that the world may know that thou hast sent me, and hast loved them, as thou hast loved me.” John 17:1, 9, 21-23

“Now I beseech you, brethren, by the name of our Lord Jesus Christ, that ye all speak the same thing, and that there be no divisions among you; but that ye be perfectly joined together in the same mind and in the same judgment. For it hath been declared unto me of you, my brethren, by them which are of the house of Chloe, that there are contentions among you”. 1 Corinthians 1:10,11

With all such questions and discussions, it is the role of the Shepherds to bring individuals and indeed, the whole congregation, to an understanding of the Word of God that can be accepted in peace and unity.

Smacking Children

All Parents of Gloriavale Christian Community signed a DECLARATION dated 30-09-2015, and worded as follows: *“In relation to correction of our children, the policy of the Gloriavale Christian Community and all its families is to abide by clauses 59, 194 and 202C of the Crimes Act 1961”*

How the Trust Deals with Complaints of Physical Assault within the Community

If the Trust receives a complaint of physical assault within the Community, it will:

1. Make investigation as to the circumstances and severity of the alleged assault, including:
2. Speaking with:
 - a. the person who made the complaint
 - b. the person who was allegedly assaulted
 - c. the person who allegedly made the assault
 - d. any witnesses to the alleged assault
3. Assess the findings of the above investigations and come to a conclusion as to the circumstances, severity and frequency of any actual assault(s).
4. If it is concluded that there was an actual assault, gather the involved parties together, and stress the seriousness of,
 - a. Breaking our united Declaration to abide by the stated provisions of the Crimes Act, as had been agreed to by all parents and leaders, and how this is a breach of what we had committed ourselves as a Christian Church Community to do.
 - b. Breaking the law of New Zealand.
5. According to the teachings of the Lord Jesus Christ and His apostles in the New Testament, the Trustees will seek to:
 - a. Bring the offender(s) to genuine repentance for their transgression towards the person whom they had assaulted, and a complete forsaking of this, and likewise for breaking our united Community declaration that we would abide by the relevant clauses of the Crimes Acts, and for breaking the law of New Zealand.
 - b. Bring the person who had been assaulted to genuine forgiveness towards the person who had assaulted them, even as Jesus taught us to pray, *“And forgive us*

our debts, as we forgive our debtors....For if ye forgive men their trespasses, your heavenly Father will also forgive you: but if ye forgive not men their trespasses, neither will your Father forgive your trespasses." Matthew 6:12, 14,15

- c. Watch carefully afterwards and check up, that all such physical assault has come to a complete end.
- d. If it has not completely ceased, persevere until it does cease, and is truly forgiven.
6. If the offender nevertheless continues to physically assault one or more people within the Community, and will not cease doing so, and does not heed the requirement of the Trustees not to do so, and continually defies and breaks our Community declaration to keep the clauses of the Crimes Act, and thus continues to break the law of New Zealand, in spite of every measure that the Trustees and other Shepherds and Servants of the Church had taken to bring the offender to the place of not doing so, then the Trustees and other shepherds and servants of the Church would have to require the offender to leave the Church and Community at Gloriavale and no longer be part of it, according to our policy, 'People Leaving and Returning to Gloriavale'
7. If this came to pass, the Trustees would tell the person to go to the police and confess that he or she had been physically assaulting one or more persons within Gloriavale, and had not taken heed to the Trustees attempts to bring this to an end. If the offender would not do this, then the Trustees themselves would advise the Police or other appropriate authority of what the offending person had done, in spite of every effort of the Trustees to guide the person to cease doing so. The Trustees would not want the offender to go out of Gloriavale, and then continue to physically assault other people in general society.
8. If the person or persons who had been physically assaulted by this offender within Gloriavale in these circumstances wished to do so, they would themselves be free to contact the Police or other appropriate Agency and advise them of what had been happening.
9. If the offender in such a case later came to true repentance, and a complete forsaking of physical assault, then that person could approach the Trustees and request to be allowed to return to Gloriavale, and his or her request would be given due consideration.

How the Trust Deals with Complaints of Sexual Assault within the Community

If the Trust receives a complaint of sexual assault within the Community, it will:

1. Make investigation as to the circumstances and severity of the alleged assault, including:
2. Speaking with:
 - a. the person who made the complaint
 - b. the person who was allegedly assaulted
 - c. the person who allegedly made the assault
 - d. any witnesses to the alleged assault
3. Assess the findings of the above investigations and come to a conclusion as to the circumstances, severity and frequency of any actual assault(s).

4. If it is concluded that there was an actual sexual assault, gather the involved parties together, and stress the seriousness of,
 - e. Disobeying the commandments of the Bible and the teachings of the Church and Community against such sin.
 - f. Breaking the law of New Zealand.
5. According to the teachings of the Lord Jesus Christ and His apostles in the New Testament, the Trustees will seek to:
 - g. Bring the offender(s) to genuine repentance for their transgression towards the person whom they had assaulted, and a complete forsaking of this, and likewise for breaking the law of New Zealand.
 - h. Bring the person who had been assaulted to genuine forgiveness towards the person who had assaulted them, even as Jesus taught us to pray, *"And forgive us our debts, as we forgive our debtors....For if ye forgive men their trespasses, your heavenly Father will also forgive you: but if ye forgive not men their trespasses, neither will your Father forgive your trespasses."* Matthew 6:12, 14, 15
 - i. Watch carefully afterwards and check up, that all such sexual assault has come to a complete end.
6. If the offender nevertheless continues to sexually assault one or more persons within the Community, and will not cease doing so, and does not heed the requirement of the Trustees not to do so, then the Trustees and other shepherds and servants of the Church would have to require the offender to leave the Church and Community at Gloriavale and no longer be part of it, according to our policy, 'People Leaving and Returning to Gloriavale'.
7. If this came to pass, the Trustees would tell the person to go to the police and confess that he or she had been sexually physically assaulting someone within Gloriavale, and has not taken heed to the Trustees attempts to bring this to an end. If the offender would not do this, then the Trustees themselves would advise the Police or other appropriate authority of what the offending person had done, in spite of every effort of the Trustees to guide the person to cease doing so. The Trustees would not want the offender to go out of Gloriavale, and then continue to sexually assault other people in general society.
8. If the person or persons who had been sexually assaulted by this offender within Gloriavale in these circumstances wished to do so, they would themselves be free to contact the Police or other appropriate Agency and advise them of what had been happening.
9. If the offender in such a case later came to true repentance, and a complete forsaking of physical assault, then that person could approach the Trustees and request to be allowed to return to Gloriavale, and his or her request would be given due consideration.

Obtaining Independent Legal Advice

It is, and has for some time been, the policy of Gloriavale Christian Community, firstly, if any person under the age of 18 years comes forward and asks to be able to make a Declaration of

Commitment to Jesus Christ and His Church and Community at Gloriavale, that they will be given a shortened Declaration of Commitment that includes statements of our faith, but excludes all reference to houses, lands, assets or money and legal matters, which is appropriate for them to make as minors. No independent legal advice will be required for such a commitment made by a minor.

But it is, and has for some time been, the policy of Gloriavale Christian Community, secondly, if any person of 18 years of over comes forward and asks to be able to make a Declaration of Commitment to Jesus Christ and His Church and Community at Gloriavale, that they will be required to first obtain independent legal advice for doing so from a lawyer other than our normal Community lawyer, before making that Declaration of Commitment.

The same policy applies if any person wishes to become a partner or associate partner of the partnership, Christian Partners.

Having a Bank Account

It is, and always has been, the policy of Gloriavale Christian Community that no member of the Community can have a bank account until that individual person has attended the local branch of a bank, after first obtaining an appointment with that bank to do so, and taking with themselves the requisite identity and address proofs, and has then met the appropriate bank officer in person, and completed the process of opening a bank account and signed all the relevant papers in the presence of that bank officer. The only exception is if the bank officials themselves come to Gloriavale to open bank accounts, which happened once before when a large number of people opened bank accounts at the one time.

It is in fact not possible for any person to open a bank account without going through the entire bank procedure for doing so in the presence of a senior bank officer, and personally signing all the required bank documents and submitting all required Identity and address proof documents.

Meeting and Communication Updates

The Trustees will ensure that there will be meetings as needed of all persons having bank accounts to review any necessary matters pertaining to those bank accounts.

The Trustees will Use communal meal times, or arrange any special meetings needed, and post any necessary material on the Community Notice Board, to inform the Beneficiaries of the Trust of the Trust's activities and administrative matters.

No Trust Financial Assistance For The Indian Christian Community

The Trust does not and never has provided any financial assistance to the Indian Christian Community. Financial assistance for the Indian Christian Community comes from the personal

bank accounts of members of the Community, holding their personal tax paid income, or other private funds.

RELEASED UNDER THE
OFFICIAL INFORMATION ACT

Charity Registration Number: **CC25088****INTERNAL AFFAIRS****Te Tari Taiwhenua**

17 October 2016

Attention of: Fervent Stedfast
 The Trust Board
 The Christian Church Community Trust
 189 Heaphy Road
 RD1
 Moana 7872

CHARITIES SERVICES
 120 Victoria Street, Wellington 6011
 PO Box 30-112, Lower Hutt 5040
 New Zealand
 Facsimile +64 4 382 3595
 Freephone 0508 242 748
 Website www.dia.govt.nz; www.charities.govt.nz

Also by email:

s9(2)(a)

and

s9(2)(a)

Dear Fervent Stedfast and the Trust Board,

This letter is to provide formal notification to you that the Department of Internal Affairs – Charities Services (“Charities Services”) has closed the investigation of the operation of the Christian Church Community Trust (“the Trust”) which was opened as a result of information received regarding possible serious wrongdoing under the Charities Act 2005 (“the Act”).

Under our mandate, Charities Services has concentrated on addressing the allegations in light of the trustees’ duties in relation to governance and management. This is because any specific allegations that might amount to criminal offending have been referred to the agencies (i.e. Police, Child Youth and Family) with a mandate to investigate and deal with them, as they see appropriate.

In the event that any of the allegations referred to other agencies should result in either the identification or prosecution of offences that represent serious wrongdoing under the Act, further compliance action would be considered by Charities Services.

Charities Services wishes to acknowledge the assistance and cooperation that the Trust and the Gloriavale community (“the Community”) have provided to Charities Services during the investigation. As you are aware, Charities Services raised a number of issues with the Trust that were identified during our investigation. It is noted that the Trust has engaged the services of a number of professional advisers and responded effectively and positively to their advice. This has involved changing the makeup and governance of the Trust, and developing and formalising policies to reflect the Trust’s commitment to achieving better governance and management.

The current trustees have informed Charities Services of the following recent actions taken to improve governance and management:

1. The current Trust Board membership will be expanded from three to five, to include two new additional trustees from the “younger people” of the Gloriavale community (the community).
2. Two external advisers to the Trust Board will be appointed – a local solicitor and a local businessman have been approached and have agreed to perform these roles.
3. Regular Trust Board meetings will occur to allow the external advisers to attend and contribute.
4. Policies that only existed verbally, and new policies responding to the issues raised by Charities Service’s investigation, are currently being formalised into written documents.

These will be provided to Charities Services when completed, and refer to many of the actions described in the following points.

5. If a member of the community states that they wish to leave the community, they will be asked to select a trusted support person who will accompany them to meetings with Servants and Shepherds. The person wishing to leave may also be supported by family members in any meetings.
6. If a person decides that they must leave the community, the trustees will ensure that the person receives sufficient funds to assist them, reflecting their contribution to the community and any salary that they earned. In addition, the person will be asked where they wish to go and will be provided with travel fares/tickets to reach their destination. All personal documents such as passports, birth certificates and proof of earnings will be provided to them.
7. Any member of the community who leaves or has previously chosen to leave is not shunned by the community and the door always remains open to that person to return, provided they agree to abide by the rules and beliefs of the community.
8. Any leaver may telephone family or friends provided that the family member or friend wishes to speak with them and it is convenient.
9. Any leaver may return to visit the community provided they behave with respect towards the community and its rules. They must discuss their visit in advance with the Leadership.
10. Any leaver may return to join the community in prayer on a Sunday provided they behave with respect towards the community.
11. Theology may be discussed and debated provided it is not an opposing opinion to the beliefs of the community and is not raised as a means of evangelising community members to an alternative set of beliefs to that which the community is founded upon.
12. Policy to detail how the Trust deals with any complaint of physical assault within the community is being formalised.
13. Policy to detail how the Trust deals with any complaint of sexual assault within the community is being formalised.
14. Smacking of children is not permitted within the community.
15. Before members of the community sign the Commitment Document they will meet with a lawyer and receive clear legal advice as to what it means to give their consent by signing.
16. All members of the community will be aware of whether they have a bank account. Bank accounts can only be opened by the individual attending a bank branch in person and producing identification.
17. The trustees will use communal meal times to inform the beneficiaries of the Trust's activities and administrative matters.
18. The Trust does not provide financial assistance to the Indian Christian Community. Financial assistance is provided to the Indian Christian Community from private bank accounts, holding the tax paid income of individuals, who are members of the community. These accounts are private accounts outside of the Trust and are operated independently of the Trust.

Charities Services continues to hold concerns around the Sharing Accounts and the Gloriavale Christian Community Account not being included in the consolidated accounts of the Trust and being considered independent of the Trust. This is because we consider the Trust *may be* in a position of control over the activities in the Accounts, and according to accounting standard PBE-IPSAS6 (Consolidated and Separate Financial Statements), this would mean the Trust would need to report on this activity. We consider this because the signatories to the account are the trustees of the Trust, and appear to operate for the benefit of the purposes of the Trust.

It is noted that this understanding exists after the Trust was advised by Marshall & Heaphy Accountants, RSL Auckland and Auditors Grant Thornton. We accept the Trust has taken advice on this matter; however Charities Services will review the Trust's consolidated accounts under its routine assurance checking process for the year ending 31 July 2016, established to assess if registered charities are complying with the External Reporting Board (XRB) requirements of New Reporting Standards. If Charities Services considers this practice does not meet the requirements of the New Reporting Standards, we may inform the Trust in relation to its ongoing reporting obligations.

We also recommend the Trust remove the three current trustees as signatories of those accounts to further demonstrate the relative independence of those accounts and that the Trust does not have control of the accounts.

The Trust was advised that under the Act, Charities Services has delegated powers to require the Trust to address issues around the trustees' duties for governance and management, particularly through issuing a warning notice under section 54 of the Act. Charities Services has concluded that the Trust has clearly demonstrated its desire to positively engage with the regulator and responded to issues raised by developing and formalising policies to reflect the Trust's commitment to achieving better governance and management. We are satisfied that at this time, given the implementation of the proposed policies, the Trust's activities would not constitute grounds for issuing a warning notice, or proceeding with further compliance action.

We still expect that the formalised policies will be forwarded for the attention of Charities Services by Monday 28 November 2016. Also, please remember that within 3 months of their appointment, the new Trust Board members must be officially notified to Charities Services.

Charities Services will continue to monitor the activities of the Trust and is prepared to offer support or advice as required, to assist the Trust.

If you wish to speak to someone in relation to any of the detail in this letter please contact me on s9(2)(a) or email s9(2)(a)

Yours sincerely,

A large, stylized handwritten signature in black ink, consisting of a large loop and a long horizontal stroke.

Jane Pierard
Acting General Manager
Charities Services
Department of Internal Affairs