Sunday, 18 October 2026 18/10/2026 20:53:29

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

PROJECT SPIRE

An Independent Investigation into the Church Commissioners for England, Historical Financial Connections with African Chattel Enslavement, the Proposed £100 Million Fund for Healing, Repair and Justice, Institutional Overlap, Financial Accountability, Community Representation and Safeguards Against Anti-Black Racism and Institutional Racism

REPARATION NATION LIMITED

Company Number: 14761041

Prepared by

Derrick Emmanuel Lynch
Also known as John Canoe

18 October 2026

24 Investigative Sections | Six Supporting Appendices | Formal Signature and Authorisation

DOCUMENT STATUS: INITIAL INVESTIGATIVE REPORT — COMPLETE AS A DRAFT, SUBJECT TO FINAL SOURCE VERIFICATION, INSTITUTIONAL RESPONSES AND CORRECTIONS

PUBLICATION AND DOCUMENT CONTROL

Title: From Community Rumours to Documented Evidence

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Company Number: 14761041

Investigator: Derrick Emmanuel Lynch (John Canoe)

Date: 18 October 2026

Version: Initial complete draft — version number to be assigned when the report is assembled and checked.

Document status: Independent documentary investigation. Further verification and institutional responses are outstanding.

Scope: Historical research, institutional responsibilities, financial commitments, legal authority, governance, professional relationships, community consultation, safeguarding and reparatory delivery.

Corrections: Material corrections will be recorded and incorporated into subsequent versions.

Circulation: Subject to final review and authorisation.

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DECLARATION OF INDEPENDENCE AND INVESTIGATIVE SAFEGUARDS

This report has been prepared as an independent documentary investigation by Reparation Nation Limited.

The investigation examines Project Spire and the Church Commissioners for England's response to historical financial connections with African chattel enslavement.

It also examines documented professional participation in related reparations activities, without presuming common institutional governance or finance.

The investigation distinguishes verified documentary evidence, institutional statements, attributed accounts, possibilities, suspicions, unresolved questions and conclusions.

I expressly state:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

The investigation seeks recognition of the possibility of anti-Black racism, racial bias and Institutional Racism within institutional decision-making, together with evidence of effective safeguards.

Questions about possible risks must not be represented as allegations that wrongdoing has already occurred.

All relevant individuals and institutions are invited to provide documentary clarification, corrections and responses.

This report is not a judicial determination or a regulatory ruling.

FOREWORD BY THE INVESTIGATOR

This investigation began with questions concerning the Global Reparations Hub, its public launch in October 2026 and apparent connections with individuals involved in Church-related reparatory activities.

Those questions led to the examination of Project Spire.

The documentary investigation subsequently revealed a substantial historical and institutional programme involving the Church Commissioners for England, Queen Anne's Bounty, the South Sea Company, historical financial research, a proposed £100 million reparatory commitment, an independent Oversight Group and the development of a Fund for Healing, Repair and Justice.

The investigation became much larger than the original questions.

It was necessary to distinguish professional participation from financial authority, consultation from representation, and the announcement of reparatory resources from their actual delivery.

I consider these distinctions essential.

Reparatory justice should be examined not only through declarations of intention but through institutional authority, transparent financial arrangements, safeguards, accountable decision-making and independently verifiable outcomes.

I am particularly concerned to establish whether the relevant institutions recognise the possibility of anti-Black racism and Institutional Racism within their decision-making processes and can demonstrate effective safeguards.

I have not made accusations, allegations or conclusions of wrongdoing.

I seek evidence.

The purpose of this report is to create a comprehensive documentary record from which responsible institutional questions can be asked and properly supported conclusions may eventually be drawn.

I also consider transparency and professional organisation important foundations for peaceful relations.

Unnecessary confusion, speculation and institutional silence can contribute to avoidable disagreements.

Clear explanations and fair procedures can help prevent those disagreements from escalating.

This report is therefore intended as a constructive, independent contribution to reparatory justice.

Sunday, 18 October 2026 18/10/2026 20:53:29

Derrick Emmanuel Lynch
John Canoe

For and on behalf of Reparation Nation Limited

18 October 2026

EXECUTIVE READER'S GUIDE

The investigation contains 24 substantive sections and six supporting appendices.

Section 1 provides the executive summary.

The subsequent sections examine the origins of the investigation, the historical financial evidence, the proposed fund, legal authority, governance, consultation, safeguards, professional appointments and institutional communications.

Sections 22–24 consolidate the outstanding questions, preliminary findings, recommendations and formal position.

The appendices establish the permanent registers required for continuing investigation.

Readers should distinguish three principal categories throughout this report.

Documented matters are supported by identified evidence.

Institutional positions describe what a responsible organisation has stated, but may require independent verification of the underlying facts.

Unresolved matters remain questions until sufficient supporting evidence becomes available.

The investigation must not be interpreted as a finding that any named individual or organisation has committed wrongdoing.

Similarly, the absence of a final finding does not eliminate legitimate questions concerning institutional safeguards, financial accountability or community participation.

The objective is accurate and responsible examination.

SUMMARY OF PRINCIPAL FINDINGS AND OUTSTANDING MATTERS

The investigation establishes that the Church Commissioners undertook historical research into financial connections with African chattel enslavement.

It establishes their original £100 million reparatory commitment in January 2023.

It establishes the appointment of an independent Oversight Group and publication of recommendations concerning investment, grant-making, governance and community leadership.

It establishes the existence of preparatory expenditure and a developing legal and regulatory process.

It also establishes certain professional roles and overlapping participation in separate reparations initiatives.

However, the investigation has not established that the Church Commissioners financed or controlled the Global Reparations Hub.

It has not independently verified the completed delivery of the £100 million to affected communities.

It has not obtained a complete contemporary financial reconciliation or all relevant governance and contractual records.

Nor has it obtained sufficient Project Spire-specific evidence to assess conclusively the effectiveness of safeguards against the possibility of anti-Black racism and Institutional Racism.

These matters remain subjects for formal institutional enquiry.

The initial documentary report is therefore complete as a draft, but the evidence-obtaining and verification process continues.

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Page numbers to be inserted after final document assembly and pagination.

ABBREVIATIONS AND DEFINITIONS

Term	Meaning
RNL	Reparation Nation Limited
Project Spire	Church Commissioners' programme concerning historical financial links to African chattel enslavement and the proposed reparatory response
CC	Church Commissioners for England
QAB	Queen Anne's Bounty
SSC	South Sea Company
FHRJ	Fund for Healing, Repair and Justice
GRH	Global Reparations Hub
Oversight Group	Independent advisory group appointed to examine and recommend development of the Commissioners' response
Commitment	An institutional undertaking to provide resources
Authorisation	Relevant legal or institutional approval
Allocation	Designation of resources for a purpose
Transfer	Actual movement of money or assets

Investment	Deployment of capital through a financial arrangement
Grant	Financial award subject to its terms
Receipt	Confirmed receipt by the intended financial recipient
Verified outcome	A demonstrated result supported by appropriate evidence
Institutional Racism	Institutional practices, systems or outcomes that can produce or sustain racial disadvantage
Safeguards	Procedures intended to prevent, identify, address or correct relevant risks
Right of reply	Opportunity to respond to material factual statements or proposed findings
Documentary evidence	Identifiable records relevant to a proposition
Unverified	Not yet established through sufficient evidence
Not established	The examined evidence does not support the proposed conclusion
Initial investigative report	The first comprehensive documentary examination, before all institutional responses and final verification

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END OF FRONT MATTER

THE SUBSTANTIVE REPORT BEGINS WITH SECTION 1 — EXECUTIVE SUMMARY.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 1 OF 24 — EXECUTIVE SUMMARY

Prepared by: **Reparation Nation Limited**
Company Number: **14761041**

Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited

Date: 18 October 2026
Investigation status: Preliminary investigation — documentary findings established; further enquiries and institutional responses outstanding.

1.1. Introduction and purpose

This report concerns the Church Commissioners for England's Project Spire, the proposed £100 million Fund for Healing, Repair and Justice, and questions arising from documented involvement of individuals associated with both Church-related reparations work and the launch of the Global Reparations Hub (GRH) in London on Saturday 17 October 2026.

The investigation began with information that was initially unsubstantiated.

Concerns had arisen about the possibility that individuals involved in the Global Reparations Hub launch were also involved in Project Spire. At that stage, the information amounted to a rumour requiring investigation. There was insufficient documentary evidence to establish whether the suggested relationship existed, what form it took, or whether it had any significance for institutional governance and accountability.

Rather than accepting the rumour as fact or dismissing it without examination, Reparation Nation Limited sought evidence.

That research identified publicly accessible documentary material establishing that Charmaine Simpson, whose involvement in the Global Reparations Hub launch was recorded in the official conference programme, had also held a documented research and engagement role with the Church Commissioners.

The initial rumour therefore acquired a substantial factual basis.

What began as an unverified suggestion of overlapping involvement developed into an investigation supported by independently identifiable documentary records.

This is an important evidential development. It does not mean that every suspicion accompanying the original rumour has been substantiated. It means that the specific suggestion of overlapping involvement is supported by published evidence.

The purpose of this report is to examine that overlap, identify the boundaries between the different initiatives, establish the responsibilities of the relevant institutions and individuals, and address concerns relating to consultation, organisational transparency, financial governance, accountability and the peaceful administration of reparatory justice.

The investigation remains open. No finding of misconduct has been made.

1.2. The event that gave rise to the investigation

On Saturday 17 October 2026, the UK Reparations Conference took place at Friends House, Euston, London.

The official conference programme included a London launch of the Global Reparations Hub, beginning at 14:25.

The published programme identified Kwesi Ochosi, founder of Building Trust Consortium, as chair of the launch session. It also identified Charmaine Simpson, CEO of Black History Studies, among the participating speakers.

Following the conference, questions arose about the formation of the Global Reparations Hub, the extent of prior consultation with longstanding grassroots Black/Afrikan reparations organisations, and the communication of the launch arrangements.

These concerns were expressed in correspondence circulated by Empress Judah during the early hours and afternoon of Sunday 18 October 2026.

Her correspondence described dissatisfaction with aspects of the launch and questioned whether organisations and individuals with longstanding involvement in reparations campaigning had been adequately informed or consulted.

She also raised questions concerning the initially advertised venue at the Black Cultural Centre in Islington and the subsequent launch arrangements at Friends House.

These matters triggered the separate investigation of the Global Reparations Hub.

During subsequent discussion, attention turned to the possibility of an overlap between those involved in the GRH launch and the Church Commissioners' Project Spire programme.

That possible connection became the immediate trigger for the present Project Spire investigation.

Source for independent verification:

UK Reparations Conference 2026 — Official Agenda
https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant passage: *London Launch of the Global Reparations Hub*, beginning at 14:25.

1.3. From initial rumour to documented evidence

The investigation's evidential progression must be understood clearly.

Initially, there was uncertainty over whether Charmaine Simpson was or had been involved in Project Spire.

The existence of an association could not properly be established through rumour alone.

A search of published institutional records subsequently identified a February 2026 programme issued by the Diocese of Southwark for an event titled *Truth-telling in sacred spaces*, held at Southwark Cathedral on 7 February 2026.

The publication identifies Charmaine Simpson as an Engagement Coordinator for the Church Commissioners and CEO of Black History Studies.

Her accompanying biography specifically describes her as Research and Engagement Coordinator for the Church Commissioners, coordinating research into the Church of England's historical connections with African chattel enslavement.

The official UK Reparations Conference programme then identifies the same named individual as a speaker involved in the Global Reparations Hub launch on 17 October 2026.

These two documentary records provide a direct, independently checkable basis for identifying her involvement across the relevant areas of work.

The original suggestion of overlapping involvement was therefore not merely speculative.

The published records substantiate the central factual element of that suggestion.

However, they do not independently establish the precise contractual arrangements, current responsibilities, financial authority, decision-making powers or extent of institutional coordination between Project Spire and the Global Reparations Hub.

Those matters require further examination.

Primary sources:

Diocese of Southwark — *Truth-telling in sacred spaces*, 7 February 2026, programme and biography, printed pages 6 and 9: https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

UK Reparations Conference 2026 — Official Agenda: https://www.appg-ar.org/uk-reparations-conference-2026-agenda

1.4. The significance of the documented personnel overlap

The existence of overlapping professional and organisational involvement is not inherently improper.

Individuals working in reparatory justice may legitimately participate in multiple organisations, conferences, research initiatives, advisory groups and community activities.

Such participation can contribute to expertise, collaboration and public understanding.

Nevertheless, where an individual has a documented role associated with an institution developing a substantial reparatory funding programme and also participates in a separate reparations initiative that has generated concerns about consultation and transparency, legitimate questions arise.

These concern the nature of any institutional relationship, whether activities were undertaken in personal or official capacities, whether responsibilities were appropriately separated, and what safeguards exist to prevent misunderstandings or conflicts of interest.

The central investigative issue is therefore not whether Charmaine Simpson was permitted to participate in both areas of work.

It is whether the relevant roles and institutional boundaries are sufficiently transparent for affected communities to understand who is responsible for which decisions.

The investigation will seek evidence rather than infer improper conduct from participation alone.

1.5. The Black Cultural Centre and the seriousness of the unresolved suspicion

An additional concern arises from the reported venue arrangements for the Global Reparations Hub launch.

Empress Judah's correspondence states that the launch was initially advertised through Eventbrite as taking place at the Black Cultural Centre in Islington.

She subsequently received information indicating that the launch arrangements had changed to the UK Reparations Conference at Friends House.

Her email of 18 October 2026 at 12:28 questioned how the conference could already have printed programmes containing the GRH launch while the originally advertised Black Cultural Centre arrangements had also been promoted.

This gives rise to a specific question about the sequence of planning, communication, venue decisions and programme production.

A serious suspicion has arisen that the Black Cultural Centre might have been used as a misleading or diversionary advertised venue.

This suspicion has not been established as fact.

The investigation has not demonstrated that any person deliberately provided false information, that the Black Cultural Centre was a dummy venue, or that an alternative venue was knowingly advertised to mislead members of the community.

Nevertheless, the suspicion is serious because the use of culturally significant institutions in reparations-related communications involves questions of community dignity, trust and respect.

If such an institution were knowingly used in a misleading manner, that could reasonably be experienced as a significant insult by affected members of the community.

The investigation must therefore seek records capable of establishing the original arrangements, booking history, publication dates, changes, authorisations and communications.

In particular, the existence of a published conference programme does not, by itself, prove that a previously advertised event was deceptive.

It does establish a basis for asking how the arrangements developed.

Evidence presently available:

Empress Judah — Email circulated 18 October 2026 at 00:50, subject concerning the London Global Reparation Hub launch.

Empress Judah — Follow-up email circulated 18 October 2026 at 12:28, beginning *Ref: London Global Reparation Hub launch…*

These are retained correspondence records, not independently accessible public webpages.

Original Eventbrite listing:
https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

The original listing and any amendments require preservation and verification, including through available screenshots or archived records.

1.6. Community concerns and the importance of attribution

The investigation recognises that concerns have been expressed by identifiable individuals within the Black/Afrikan reparations community.

Empress Judah's correspondence provides direct evidence that such concerns were raised.

Her emails identify questions about consultation with longstanding reparations organisations, access to information, the apparent handling of questions during the GRH launch, and the adequacy of communication before the event.

These concerns are sufficiently specific to warrant examination.

However, the investigation must not imply that every Black/Afrikan organisation or community member shares the same position unless supporting evidence establishes that fact.

Individual testimony must be attributed accurately.

Community concerns must be taken seriously without being converted into claims of universal community agreement.

Similarly, dissatisfaction with the GRH launch must not automatically be treated as evidence of deficiencies within Project Spire.

The projects remain institutionally distinct unless and until a specific relationship is established.

1.7. Project Spire and the proposed £100 million fund

Project Spire is associated with the Church Commissioners' response to historical links between predecessor bodies and African chattel enslavement.

The Church Commissioners have publicly committed £100 million over a nine-year period to an initiative intended to support communities affected by the practical legacy of African chattel enslavement.

The proposed Fund for Healing, Repair and Justice is described as an impact-investment model that may also support future grant-making.

This distinction is important because the proposed model is not simply a scheme for distributing £100 million in direct financial compensation to individual descendants of enslaved people.

In correspondence published on 19 January 2026, the Church Commissioners explicitly distinguished their proposal from individual reparations payments.

The Church Commissioners' official enquiry page presently describes the fund as being in implementation and regulatory-development work and not yet operational.

Consequently, the public commitment of £100 million must not be confused with verified distribution of £100 million to organisations or individuals.

At this preliminary stage, the investigation has not established a complete recipient-level record of any Project Spire allocations, transfers or verified benefits.

Questions concerning financial commitment, authorisation, allocation, investment, grants, receipt and independent verification will therefore be examined separately.

Primary sources:

Church of England — Fund for Healing, Repair and Justice, Frequently Asked Questions: https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Church of England — Tell us what you think: https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Church Commissioners — Response to parliamentarians, 19 January 2026: https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

1.8. Why the Church Commissioners should be informed at an early stage

Reparation Nation Limited considers that the documented personnel overlap, the existence of community concerns, and the financial and historical importance of Project Spire together provide reasonable grounds for informing the Church Commissioners.

The purpose of doing so is not to transfer responsibility for the Global Reparations Hub launch to the Church Commissioners.

Nor is it to suggest that the Church Commissioners necessarily knew about, approved or controlled the launch arrangements.

The purpose is to establish what the Commissioners know, whether any relevant institutional relationship exists, and what safeguards govern overlapping responsibilities and community engagement.

It is preferable to raise these matters while the proposed fund remains in development rather than wait until larger financial decisions have been made or resources transferred.

Early scrutiny provides an opportunity for misunderstandings to be corrected, incomplete information to be supplied, concerns to be addressed and institutional responsibilities to be clarified.

The Church Commissioners' own published statement of 19 January 2026 expressly welcomes scrutiny and questions.

Reparation Nation Limited therefore seeks constructive engagement consistent with that public commitment.

1.9. Transparency, professional organisation and the prevention of violence

Reparation Nation Limited adopts a standing principle applicable to all reparations matters, not solely Project Spire.

Transparency, high-quality organisation, meaningful consultation, truthful communication and clear accountability are essential safeguards for maintaining peace and preventing violence and threats of violence.

Reparations concern historical atrocities, the violence of African chattel enslavement, dispossession, intergenerational grief, racial injustice and deeply held expectations of justice.

They may also involve significant financial resources, competing institutional responsibilities and disputes over representation, entitlement, eligibility and distribution.

It is reasonable to consider the possibility that unresolved grievances, perceived exclusion, unexplained decisions or seriously defective communications could intensify conflict as financial stakes increase.

That is a matter for preventative assessment, not a prediction that violence will occur.

Reparation Nation Limited believes such issues should be raised early, rigorously and uncompromisingly, rather than postponed until disputes have become more difficult to resolve.

By uncompromising scrutiny, we mean persistent examination of evidence, professional questioning, accountability and the pursuit of clear written explanations.

We do not mean intimidation, threats, hostility, coercion or harassment.

The investigation seeks to reduce the possibility of violence and threats of violence by promoting informed dialogue, reliable organisation, early clarification and fair procedures.

No threat of violence is being made or endorsed by this investigation.

No named person or institution is accused of threatening violence.

This preventative principle will apply throughout the present investigation and Reparation Nation Limited's other reparations work.

1.10. Safeguards against anti-Black racism and Institutional Racism

A further major issue concerns the safeguards operating within reparations institutions.

The investigation will ask whether the Church Commissioners acknowledge the possibility that anti-Black racism, racial bias or Institutional Racism could affect consultation, governance, organisational selection, beneficiary eligibility and financial decision-making in the absence of effective protections.

This is a question about potential institutional risks and preventative safeguards.

It is not an assertion that discrimination has occurred.

The investigation will seek documentary evidence of relevant equality policies, independent review procedures, complaints mechanisms, appeals processes, conflict-of-interest controls and safeguards protecting people who challenge decisions.

Affected individuals should not be required to prove that discrimination has already occurred before they are permitted to ask what preventative safeguards exist.

The investigation will also examine whether independent Black/Afrikan reparations organisations have meaningful opportunities to participate, raise concerns and seek information regardless of their relationship with existing Church or institutional networks.

1.11. Independence and separation of investigations

This Project Spire investigation is a separate project under Reparation Nation Limited.

The Global Reparations Hub investigation concerns the identity, formation, governance, consultation, communications and accountability arrangements of the GRH.

The Project Spire investigation concerns the Church Commissioners' reparatory programme, its documented institutional relationships, governance, funding arrangements, public accountability and safeguards.

The Black Cultural Centre questions concern the Centre's possible involvement in the original launch arrangements, its institutional management and the circumstances surrounding the venue advertisement.

These matters may intersect.

However, their investigation records, evidence, correspondence, institutional responsibilities and findings must remain separate.

No financial, governance or organisational relationship will be assumed merely because an individual participated in more than one initiative.

Any connection must be supported by identifiable evidence.

1.12. Preliminary findings

At the opening of this investigation, the following can be stated.

The Global Reparations Hub launch was included in the published programme for the UK Reparations Conference on 17 October 2026.

Charmaine Simpson was named as a participant.

Published Diocese of Southwark material identifies her research and engagement role with the Church Commissioners and her position as CEO of Black History Studies.

These records substantiate the initially unverified suggestion of overlapping involvement.

Empress Judah circulated identifiable correspondence raising concerns about grassroots consultation, the organisation of the GRH launch and its advertised venue arrangements.

The correspondence establishes that such concerns were raised. It does not independently prove every reported occurrence or the intentions attributed to the organisers.

The Church Commissioners have publicly committed £100 million to their proposed reparatory initiative, while their published information continues to describe the fund as not yet operational.

There remains no established basis in this investigation for concluding that Project Spire and GRH share institutional control, that the Black Cultural Centre was deliberately used as a distraction, that Project Spire resources have been misused or that any individual has acted unlawfully.

These distinctions are essential to the integrity of the investigation.

1.13. Matters requiring urgent clarification

The first phase of the investigation will seek to establish the precise nature of Charmaine Simpson's Project Spire responsibilities and the capacity in which she participated in the GRH launch.

It will examine whether any formal relationship exists between Project Spire and the GRH, what role Kwesi Ochosi may have held in related Church activities, and how any overlapping responsibilities were managed.

It will seek clarification concerning the original Black Cultural Centre venue arrangements, the timing of the published conference programme and the organisation of the GRH launch.

It will also investigate Project Spire's present legal and financial status, consultation arrangements, safeguards against anti-Black racism and Institutional Racism, and procedures for community accountability and peaceful conflict prevention.

The relevant institutions and individuals must have a fair opportunity to provide answers, documentary evidence and corrections.

1.14. Declaration of investigative position

Reparation Nation Limited is conducting this investigation independently.

I am a Black person concerned with the integrity, transparency and peaceful delivery of reparatory justice.

I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.

Where I refer to a possibility, suspicion, reported event or apparent connection, those words are deliberate and must retain their original meaning.

The investigation will not convert suspicions into facts, questions into accusations, or documentary associations into findings of wrongdoing.

Equally, it will not dismiss serious community concerns merely because they raise uncomfortable questions for established institutions or influential individuals.

The investigation will follow the evidence wherever it legitimately leads, maintain fairness to all parties, and pursue transparency and professional accountability from the earliest possible stage.

1.15. Executive conclusion

The initial information concerning overlapping involvement between Project Spire-related work and the Global Reparations Hub launch began as an unsubstantiated rumour.

The search for independently accessible records established that a central element of that rumour had a substantial factual basis.

Charmaine Simpson's involvement in Church Commissioners research and engagement work and her participation in the GRH launch are documented through published institutional and conference materials.

This evidential development provides a concrete basis for further investigation.

At the same time, questions surrounding the Black Cultural Centre, the apparent chronology of venue changes, grassroots consultation, organisational responsibilities and any wider institutional relationships remain unresolved.

The proposed £100 million reparatory programme adds importance to ensuring that transparency, accountability and safeguards are examined before financial and organisational decisions become more consequential.

The fundamental purpose of this investigation is to establish the facts early, prevent misunderstanding, protect community dignity, encourage professional organisation and reduce the possibility of conflict, violence and threats of violence.

The investigation proceeds without predetermined findings and with an explicit commitment to evidence, fairness, public understanding and the peaceful pursuit of reparatory justice.

END OF SECTION 1 — EXECUTIVE SUMMARY

Next: Section 2 — Purpose, Authority, Independence, Scope and Investigative Standards.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 2 OF 24

PURPOSE, AUTHORITY, INDEPENDENCE, SCOPE AND INVESTIGATIVE STANDARDS

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Status: Independent preliminary investigation — evidence gathering, verification and institutional clarification ongoing.

2.1. Purpose of this section

This section establishes the authority, independence, purpose, boundaries and professional standards under which Reparation Nation Limited is conducting its investigation into Project Spire.

It is intended to prevent misunderstanding about why the investigation was opened, who authorised it, what it seeks to establish, what investigative powers are available, and what limitations apply.

These distinctions are particularly important because the investigation concerns institutions and individuals involved in reparatory justice, the proposed allocation of substantial financial resources, and concerns expressed by members of the Black/Afrikan reparations community.

The investigation must be rigorous enough to examine difficult questions without fear or favour, while remaining sufficiently disciplined to distinguish genuine evidence from rumour, speculation, misunderstanding and unsubstantiated accusations.

Its purpose is to promote truth, transparency, accountability, effective safeguarding and the peaceful administration of reparatory justice.

2.2. Identity and legal standing of Reparation Nation Limited

Reparation Nation Limited is a company registered in England and Wales under Company Number 14761041.

It is conducting this investigation as an independent organisation engaged in researching, documenting and examining reparatory justice initiatives and the arrangements through which reparatory commitments may produce identifiable benefits for affected communities.

Its associated work includes the development of IBIS — Developing Architecture for International Reparatory Justice — and Reparation Nation Shipping.

These activities provide an organisational and methodological context for the investigation.

They do not confer statutory investigative powers.

Reparation Nation Limited does not claim to be a regulator, police authority, court, parliamentary committee or government-appointed commission of inquiry.

It has no automatic power to compel individuals to answer questions, require disclosure of confidential documents or impose sanctions.

Its investigative authority arises from its independent decision to examine matters of public interest, consider lawfully available evidence, request voluntary cooperation, analyse institutional information and publish appropriately evidenced findings.

The absence of statutory investigative powers does not prevent an organisation from asking legitimate questions concerning transparency, governance, consultation, financial commitments or public accountability.

However, requests for information must be distinguished from legally enforceable demands.

2.3. Origin and authority to commence the investigation

The Project Spire investigation was not initiated by a court order, statutory direction or formal appointment by the Church Commissioners.

It arose from concerns associated with the Global Reparations Hub launch on 17 October 2026, subsequent correspondence from Empress Judah on 18 October 2026, and the identification of possible overlapping involvement by individuals associated with both initiatives.

In her correspondence, Empress Judah expressly requested that John Canoe investigate Project Spire, including questions about when and how economic reparatory resources might reach Black/Afrikan reparations organisations.

Reparation Nation Limited subsequently made its own decision to examine the matter.

The original request is therefore part of the investigation's documented history, but it does not automatically make Empress Judah the commissioning authority, legal client or representative of every organisation concerned.

Neither does her request authorise Reparation Nation Limited to speak on behalf of all Black/Afrikan communities.

The investigation is undertaken independently, with responsibility for its scope, evidence, interpretation, corrections and publications remaining with Reparation Nation Limited.

This distinction protects both the independence of the investigation and the position of the person who originally requested further enquiries.

2.4. The distinction between a request, a rumour, a trigger and evidence

Four separate stages must be distinguished.

First, a person may request an investigation because of an experience, concern, uncertainty or unanswered question.

Second, the information underlying that request may initially amount to an unverified rumour.

Third, further examination may identify a specific event, discrepancy or documented relationship sufficient to justify a focused investigation.

Fourth, documentary evidence may substantiate particular elements of the original information without necessarily establishing every accompanying suspicion.

This progression is central to the present investigation.

The initial suggestion that Charmaine Simpson was involved in Project Spire was not treated as established merely because the information had circulated.

Published documentation was subsequently located identifying her research and engagement work with the Church Commissioners and her separate participation in the Global Reparations Hub launch.

The initial rumour concerning overlapping involvement therefore acquired a substantial factual basis.

That finding provides a specific investigative trigger.

It does not prove a financial relationship between the two initiatives, a conflict of interest, inappropriate conduct or responsibility for the concerns arising from the GRH launch.

Each additional proposition requires independent examination.

The substantiation of one rumour must not be used to imply that every related suspicion has also been substantiated.

2.5. Primary objectives of the investigation

The investigation has six principal objectives.

The first is to identify the individuals, organisations and institutional relationships relevant to Project Spire and establish the documented nature of their involvement.

The second is to examine the transparency and accountability of Project Spire's governance, consultation, decision-making and external engagement arrangements.

The third is to establish the legal, regulatory and operational status of the proposed £100 million Fund for Healing, Repair and Justice, including how commitments may eventually result in verified benefits.

The fourth is to examine whether independent Black/Afrikan grassroots reparations organisations have fair and meaningful opportunities to participate in consultation and future programme arrangements.

The fifth is to establish what safeguards exist against anti-Black racism, Institutional Racism, conflicts of interest, exclusion and other risks that could undermine institutional accountability.

The sixth is to encourage early, professional and transparent handling of disputes in order to reduce the possibility of escalating community tensions, violence or threats of violence.

These objectives are investigative questions and areas of examination, not predetermined findings.

2.6. Institutional independence and separation of projects

Project Spire, the Global Reparations Hub and the Black Cultural Centre in Islington must be treated as distinct subjects of investigation.

Their separate legal identities, management structures, activities, finances and decision-making arrangements must not be combined merely because individuals may have participated in more than one initiative.

The Global Reparations Hub investigation concerns its formation, institutional identity, consultation, launch arrangements, communications, governance and accountability.

The Project Spire investigation concerns the Church Commissioners' proposed reparatory programme, institutional roles, governance, consultation, financial structure, implementation and safeguards.

The Black Cultural Centre enquiry concerns the Centre's management and access arrangements, together with questions about its apparent involvement in the original GRH launch advertisement.

Connections between these investigations may be recorded where supported by evidence.

Such connections must be identified precisely.

An individual speaking at two events does not establish shared financial control.

An organisational association does not establish delegated decision-making authority.

An advertised venue does not necessarily establish a completed venue booking.

Attendance at a consultation does not automatically establish endorsement or community consent.

These distinctions are mandatory throughout the investigation.

2.7. Independence from interested parties

Reparation Nation Limited's investigation must remain independent of the persons and institutions whose activities are being examined.

This includes independence from the Church Commissioners, Project Spire personnel, GRH organisers, participating organisations, individual correspondents and other interested parties.

No institution should be permitted to determine the investigation's findings merely through its institutional position.

Equally, no correspondent's suspicion should automatically become the investigation's conclusion.

Where evidence supports an individual's account, that support must be acknowledged.

Where evidence contradicts an account, the contradiction must be recorded fairly.

Where the position remains uncertain, the uncertainty must be preserved.

The investigation must retain the ability to correct its own mistakes.

Its independence must also extend to the treatment of organisations whose views differ from those of Reparation Nation Limited.

Disagreement must never be treated as evidence of wrongdoing.

2.8. Public-interest justification

The investigation concerns matters that may be of legitimate interest to the wider public, including people who are not members of any reparations organisation.

The Church Commissioners have publicly announced a substantial reparatory financial commitment arising from research into historical links to African chattel enslavement.

Questions concerning governance, consultation, decision-making, charitable authorisation and the actual movement of resources are therefore significant.

The public-interest justification does not depend upon proving wrongdoing before questions may be asked.

Institutions may properly be questioned about how they prevent problems, what procedures govern decisions and how affected communities can obtain information.

Transparency is particularly important where programmes are presented as responses to historic injustice.

Those who may ultimately be affected by a programme require accurate information about its purpose, progress, eligibility criteria, financial structure and limitations.

Reparation Nation Limited's investigation seeks to assist that understanding.

2.9. Legal limitations and the distinction between obligations and voluntary cooperation

The investigation recognises an important legal distinction between an institution's general obligations under applicable law and any obligation to respond to an independent enquiry.

The Church Commissioners are subject to applicable charity law and their own legal and governance responsibilities.

Certain institutional records may be publicly available through the Charity Commission, parliamentary publications and official Church of England sources.

However, Reparation Nation Limited does not assume that every private record is disclosable or that every question must legally be answered.

The Freedom of Information Act 2000 does not automatically apply to an institution merely because it is a charity or performs an important public function.

The Charity Commission, as a public authority, may separately hold information that can be requested under applicable access-to-information legislation, subject to exemptions and other legal restrictions.

The investigation may request cooperation and seek clarification without misrepresenting its legal powers.

Where statutory rights of access are potentially relevant, the legal position should be identified and verified before any formal demand is made.

The Church Commissioners' published willingness to receive questions and scrutiny provides an additional basis for constructive engagement, but it must not be confused with an unlimited legal duty to disclose information.

Primary verification sources:

Charity Commission — Search the Charity Register:
https://register-of-charities.charitycommission.gov.uk/

Information Commissioner's Office — Freedom of Information:
https://ico.org.uk/for-organisations/foi/

Church of England — Project Spire enquiries:
https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

2.10. Mandatory standards of evidence

All substantive findings must be supported by identifiable evidence.

The investigation will use five principal evidential categories.

Documented fact: Information established through an identifiable primary or otherwise reliable documentary source.

Attributed account: Information reported by an identifiable witness, participant, correspondent or organisation, clearly attributed to that source.

Suspicion or possibility: A proposition considered worthy of investigation but not established as fact.

Unanswered question: A material issue requiring further evidence or clarification.

Investigative finding: An assessment reached after considering the available evidence, including relevant alternative explanations and limitations.

These categories must not be used interchangeably.

In particular, a documented report that somebody expressed a suspicion establishes that the suspicion was expressed. It does not establish that the underlying conduct occurred.

Similarly, documentary evidence of overlapping participation establishes overlapping participation. It does not automatically establish improper institutional coordination.

Every significant factual claim should identify the supporting source, publication date where available, relevant passage and direct verification link.

2.11. Accessibility of evidence to ordinary members of the public

A central objective is to make the investigation understandable and independently checkable by ordinary members of the public.

Institutional reports frequently rely upon technical terminology, complex organisational structures and references that may be difficult for non-specialists to interpret.

This investigation will seek to avoid unnecessary barriers to public understanding.

Wherever possible, every significant factual statement will be accompanied by a direct link to the underlying source.

Readers should not be expected to accept a claim simply because Reparation Nation Limited has made it.

They should be able to examine the evidence themselves.

Where a source is lengthy, the investigation should identify the relevant page, section, heading or passage.

Where a source is unavailable publicly, the document should explain whether it is held in correspondence, an attachment or an internal evidence register.

Personal information should be handled appropriately, and private correspondence should not automatically be published in full merely because it has been received.

Technical language should be explained where necessary.

The objective is public understanding without compromising evidential accuracy.

2.12. Preservation of original documents and correspondence

Original evidence must be preserved wherever lawful and practicable.

This includes emails, published programmes, event advertisements, institutional statements, relevant website pages and subsequent corrections.

The investigation should retain publication dates, receipt dates, original wording, source addresses and relevant attachments.

Where possible, copies of important webpages should be preserved because online material can be amended or removed.

If a document changes, the investigation should distinguish the earlier and later versions rather than silently replacing the original evidence.

Original correspondence must not be edited to create a misleading impression.

Quotations must be accurate and placed in their proper context.

If a correction is necessary, the corrected record should identify what changed and why.

These procedures are particularly important in relation to the GRH venue arrangements, because the timing of different advertisements, communications and programme publications is a central unresolved question.

2.13. Treatment of rumours and suspicions

Rumours may provide useful leads, but they do not themselves establish facts.

The investigation will neither dismiss a potentially important concern solely because it began as a rumour nor treat that rumour as proven before documentary examination.

The present investigation demonstrates why that distinction matters.

The initial rumour about overlapping involvement was capable of verification.

Research established a documentary basis for the relevant association.

That development justified further enquiry.

However, the separate suspicion that the Black Cultural Centre might have been deliberately used as a diversion remains unresolved.

Its seriousness does not remove the need for evidence.

Nor does its unresolved status require the concern to be ignored.

The proper response is to identify the precise facts needed to confirm, clarify or reject the suggested explanation.

2.14. Fairness to named individuals and organisations

Named individuals must be treated fairly.

The investigation may identify their documented positions, public activities, official statements and relevant responsibilities.

It must not attribute improper motives solely from professional associations, attendance at events or community disagreement.

Before publishing adverse findings, the investigation should seek appropriate clarification from those concerned and allow a reasonable opportunity for response.

Responses should be considered on their merits.

Where an individual disputes an interpretation, that disagreement should be documented accurately.

Where evidence is incomplete, the investigation should acknowledge the limitation.

This applies equally to Charmaine Simpson, Kwesi Ochosi, the Church Commissioners, the GRH organisers, the Black Cultural Centre and other relevant participants.

Fairness must not depend upon an individual's reputation, institutional influence, ethnicity, organisational affiliation or willingness to agree with the investigation.

2.15. Safeguards against anti-Black racism and Institutional Racism

The investigation will examine whether relevant institutions maintain effective safeguards against the possibility of anti-Black racism and Institutional Racism.

This includes consideration of governance, consultation, organisational selection, beneficiary eligibility, complaints, independent review and financial decision-making.

The investigation does not require an established incident of discrimination before asking what preventative safeguards exist.

It is legitimate to seek evidence concerning how institutional systems identify and address the possibility of racial bias.

At the same time, the absence of an immediately available policy document must not automatically be presented as proof that safeguards do not exist.

The institution should first be asked to identify and explain the relevant arrangements.

Any subsequent assessment must distinguish between a safeguard that exists on paper, one that is operational, and one whose effectiveness has been independently evaluated.

This distinction is fundamental to meaningful institutional accountability.

2.16. Violence, threats of violence and preventative responsibility

Reparation Nation Limited considers transparency and high-quality organisation to be essential safeguards for maintaining peace in all reparations matters.

Reparatory justice involves historical violence, significant cultural and emotional concerns, and potentially substantial financial resources.

As institutions develop programmes involving representation, compensation, investment, grants and distribution, disputes may arise over authority, access, priorities and fairness.

Poor communication, unexplained decisions, perceived exclusion and misleading information may intensify grievances.

The possibility of violence or threats of violence must therefore be considered seriously as part of preventative planning.

Such consideration does not imply that violence is inevitable.

Nor does it imply that individuals raising concerns are violent or likely to become violent.

The purpose is to prevent escalation through competent organisation, early disclosure, fair consultation, clear responsibility, effective complaints procedures and peaceful dispute resolution.

Reparation Nation Limited's investigative approach must remain nonviolent, lawful and professional.

References to possible violence are expressions of concern for prevention and public safety, not threats or attempts to pressure individuals through intimidation.

The investigation will examine what preventative safeguards relevant institutions have established and whether those safeguards are accessible to affected communities.

2.17. Early intervention before significant financial distribution

The timing of this investigation is deliberate.

Project Spire involves a publicly announced £100 million commitment, while the proposed fund's operational and regulatory arrangements require continuing verification.

Reparation Nation Limited considers this an appropriate stage to examine governance, consultation, institutional relationships and preventative safeguards.

Once substantial financial decisions have been implemented, correcting deficiencies may become more difficult.

Early scrutiny can identify uncertainty, encourage clearer procedures and help protect institutional and community confidence.

This does not mean that the allocation or transfer of money inevitably causes conflict.

It means that the consequences of unclear responsibilities, inadequate communication or contested decisions may become more serious where substantial resources are involved.

Accordingly, the investigation will seek clarification before relying upon future distributions as evidence of effective implementation.

2.18. Financial accountability and the distinction between promises and delivery

The investigation will follow Reparation Nation Limited's established financial-documentation principle.

An announcement is not a transfer.

A commitment is not an allocation.

An allocation is not necessarily a payment.

A payment is not automatically evidence of receipt by an intended beneficiary.

A reported receipt is not the same as independently verified receipt.

Each stage must be documented separately.

The £100 million Project Spire commitment will therefore be treated as a commitment unless and until further evidence establishes subsequent financial movements.

Where funds are invested rather than distributed directly, the investigation will distinguish investment principal, returns, operating costs, grants, other expenditure and identifiable community benefits.

No organisation will be identified as having received a payment without an appropriate evidential basis.

Equally, the absence of a verified recipient record in the investigator's possession must not automatically be treated as proof that no relevant expenditure has occurred.

2.19. Consultation, representation and community consent

The investigation recognises that longstanding grassroots reparations organisations may possess substantial historical experience, accumulated knowledge and legitimate interests in reparatory initiatives.

It is therefore appropriate to ask how such organisations are identified, consulted and enabled to participate.

However, no individual or organisation automatically represents the entire Black/Afrikan community.

Institutional consultation must distinguish between inviting participants, receiving submissions, recognising experience, seeking endorsement and establishing consent.

Attendance at a conference does not necessarily establish agreement.

Participation in a consultation does not automatically authorise someone to represent all affected persons.

Conversely, disagreement with an institution should not automatically undermine an organisation's eligibility to engage in good-faith consultation.

The investigation will seek evidence of how Project Spire addresses these matters.

2.20. Institutional cooperation and right of reply

Reparation Nation Limited will seek constructive cooperation from the Church Commissioners and other relevant institutions.

The proposed formal notice will identify the documented evidence, explain the questions arising from it and request written clarification.

The investigation should provide sufficient detail to enable responsible officers to understand what information is being requested and why.

Where a question falls outside an institution's responsibilities, clarification or referral to the appropriate body should be requested.

Where answers are incomplete, follow-up enquiries may be appropriate.

Where institutions provide corrections, those corrections must be examined and recorded.

Failure to reply should be documented accurately, including the date, method of contact and any acknowledgement received.

Silence must not automatically be converted into an admission of wrongdoing.

The investigation must preserve a fair opportunity for explanation.

2.21. Publication, privacy and public safety

The findings of this investigation may be made available to the public because they concern matters of legitimate public interest.

Nevertheless, publication must be responsible.

Public documents should distinguish facts from disputed accounts and avoid unnecessarily disclosing private contact details or personal information.

Named individuals should not be exposed to harassment or intimidation through careless publication.

Where serious questions are being investigated, the report should make clear which persons have been invited to respond and whether their responses have been received.

If corrections become necessary, they should be published or recorded in a manner proportionate to the original publication.

The objective is an accessible, reliable documentary record rather than an instrument for personal confrontation.

2.22. Investigative methodology and accountability

The investigation will proceed through identifiable stages.

First, relevant evidence will be collected and catalogued.

Second, the chronology of events and records will be established.

Third, the roles and responsibilities of persons and organisations will be mapped.

Fourth, unanswered questions and evidential gaps will be identified.

Fifth, appropriate institutions and individuals will be invited to provide clarification.

Sixth, responses will be assessed against the documentary record.

Seventh, findings and outstanding questions will be published or preserved with appropriate qualifications.

Finally, the investigation will remain open to corrections, newly discovered evidence and changes in institutional arrangements.

No stage should be silently omitted where doing so could distort the findings.

The investigation must also remain accountable for its own accuracy and methods.

2.23. Limitations of the present investigation

As at 18 October 2026, the investigation has established documentary evidence of overlapping involvement by Charmaine Simpson.

It has also identified contemporaneous correspondence raising concerns about the GRH launch.

However, it has not yet established the full contractual or institutional relationships between relevant parties.

It has not determined whether the Black Cultural Centre was deliberately used as a misleading or diversionary venue.

It has not established misconduct by Project Spire officials or financial wrongdoing.

It has not verified a complete record of payments, grants, investments or beneficiary receipts associated with the proposed fund.

It has not obtained formal written answers from the Church Commissioners addressing the specific questions raised by this investigation.

These limitations must remain visible to readers.

They are not reasons to abandon the investigation.

They identify the matters on which further documentary work is required.

2.24. Standing declaration concerning accusations and conclusions

The position of Reparation Nation Limited is explicit.

I am a Black person seeking evidence, institutional clarification, transparency and effective safeguards.

I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.

Where the investigation uses expressions such as *possible*, *appears*, *reported*, *suspected*, *unverified* or *not established*, those expressions are intentional.

They must not be silently strengthened, weakened or replaced with language carrying a different meaning.

Reparation Nation Limited retains responsibility for defining its own investigative questions and interpreting the evidence obtained.

The principle that a person should not have to surrender control of their own meaning in order to receive assistance applies throughout the investigation.

2.25. Conclusion: authority must be matched by responsibility

Reparation Nation Limited does not claim powers it does not possess.

It does claim the right to undertake responsible independent research, ask legitimate questions, scrutinise publicly available information and invite institutions to account for their published commitments and arrangements.

That activity carries corresponding responsibilities.

The investigation must be factual, fair, accessible, transparent, independent and open to correction.

It must take community concerns seriously while protecting individuals from premature accusations.

It must investigate institutional arrangements without assuming that professional overlap establishes wrongdoing.

It must distinguish financial promises from verified delivery.

Above all, it must recognise that reparatory justice concerns deeply sensitive matters in which professional organisation, transparent communication and early conflict prevention are essential.

Reparation Nation Limited's governing investigative position is therefore to examine difficult questions early, pursue documentary evidence rigorously, provide fair opportunities for response, and promote peaceful accountability before unresolved disputes have an opportunity to intensify.

SOURCES AND INDEPENDENT VERIFICATION

Source 2.1 — Companies House

Official register for Reparation Nation Limited, Company No. 14761041.

https://find-and-update.company-information.service.gov.uk/company/14761041

Purpose: To verify the company's registered identity and publicly available corporate particulars.

Source 2.2 — Diocese of Southwark

Truth-telling in sacred spaces, programme for 7 February 2026.

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

Purpose: Documentary evidence of Charmaine Simpson's Church Commissioners research and engagement role.

Source 2.3 — UK Reparations Conference 2026

Official conference programme.

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Purpose: Verification of the GRH launch, named participants and published arrangements.

Source 2.4 — Church Commissioners for England

Project Spire official enquiry and implementation information.

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Purpose: Verification of official programme communications, implementation status and engagement arrangements.

Source 2.5 — Charity Commission for England and Wales

Official register of charities.

https://register-of-charities.charitycommission.gov.uk/

Purpose: Identification of relevant charitable bodies, their governing information and available public records.

Source 2.6 — Information Commissioner's Office

Official guidance on Freedom of Information.

https://ico.org.uk/for-organisations/foi/

Purpose: Distinguishing legal access-to-information obligations from voluntary institutional disclosure.

Source 2.7 — Original correspondence

Empress Judah, emails dated 18 October 2026 at 00:50 and 12:28.

Purpose: Documentary record of the reported launch concerns, community consultation questions, venue chronology and request for further investigation.

Status: Correspondence supplied for this investigation; no general public verification link established.

Source 2.8 — Reparation Nation Limited internal investigation record

Project Spire Investigation Restart/Handover Document, dated 18 October 2026.

Purpose: Establishes the origin, preliminary scope, methodology, unresolved questions and separation from other investigations.

Status: Internal investigation document.

END OF SECTION 2 — PURPOSE, AUTHORITY, INDEPENDENCE, SCOPE AND INVESTIGATIVE STANDARDS

NEXT: SECTION 3 — THE ORIGINAL RUMOURS: THEIR ORIGIN, CONTENT, ATTRIBUTION AND INITIAL EVIDENTIAL STATUS.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 3 OF 24

THE ORIGINAL RUMOURS: THEIR ORIGIN, CONTENT, ATTRIBUTION AND INITIAL EVIDENTIAL STATUS

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Preliminary investigation — factual leads partly substantiated; questions about intentions, responsibilities and institutional relationships remain unresolved.

3.1. Purpose of this section

This section reconstructs the information, concerns, rumours and suspicions that led Reparation Nation Limited to examine the possible relationship between the Global Reparations Hub (GRH) and the Church Commissioners for England's Project Spire.

It is particularly important to preserve the distinction between what was originally reported, what the available correspondence actually establishes, what subsequent research has verified and what remains uncertain.

The investigation began with information that had not yet been supported by documentary evidence.

The proper investigative response was neither to accept that information automatically nor to dismiss it without examination.

Instead, Reparation Nation Limited sought documentary material against which the original information could be tested.

The subsequent discovery of records identifying Charmaine Simpson's involvement in Church Commissioners research and engagement work, together with her separately documented participation in the Global Reparations Hub launch, materially changed the evidential position.

An initial rumour concerning overlapping involvement developed a substantial factual basis.

That development forms the immediate trigger for this separate Project Spire investigation.

However, the existence of this verified association does not establish the truth of other suspicions concerning deliberate exclusion, misleading venue arrangements, conflicts of interest or institutional wrongdoing.

These different propositions must be examined independently.

3.2. The background: a highly sensitive reparations environment

The events under examination occurred within a wider environment of longstanding Black/Afrikan reparations campaigning, public discussion of historical responsibility, and developing institutional reparatory initiatives.

For many participants, reparations are not simply a matter of establishing a fund or announcing a new organisation.

They concern historical violence, African chattel enslavement, dispossession, intergenerational grief, dignity, recognition, financial accountability and the practical delivery of justice.

Longstanding community organisations and individual activists may have invested substantial periods of their lives in campaigning, organising events, maintaining historical records, making representations and seeking public recognition of reparatory claims.

Against that background, the announcement of a new reparations institution may generate questions about who established it, who was consulted, who has authority to speak for affected communities and how its activities relate to existing campaigns.

The existence of such questions is not evidence that an initiative is illegitimate.

It does, however, establish why transparency and clear organisation are important from the outset.

Where substantial financial commitments may eventually become involved, uncertainty over responsibilities, representation and access can become particularly consequential.

This context explains the seriousness with which Reparation Nation Limited approaches the events surrounding the GRH launch and the subsequent questions about Project Spire.

3.3. The Global Reparations Hub launch of 17 October 2026

The published UK Reparations Conference programme identified a London launch of the Global Reparations Hub taking place at Friends House, Euston, on Saturday 17 October 2026.

The programme scheduled the session for 14:25.

It identified Kwesi Ochosi as chair and named Charmaine Simpson among the participating speakers.

These are matters capable of verification through the published conference programme.

The existence of the scheduled launch is therefore not merely a rumour.

However, the published programme alone does not establish the complete history of the GRH's formation, its governing structure, the extent of prior consultation, or the legal and financial responsibilities of individuals appearing on the programme.

Those matters require separate evidence.

The distinction is particularly important because participation in a public conference session does not automatically establish control over every aspect of the organisation being discussed.

Independent verification:

UK Reparations Conference 2026 — Official Agenda
https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant item: Global Reparations Hub launch, 17 October 2026, 14:25.

3.4. The first relevant correspondence from Empress Judah

At 00:50 on Sunday 18 October 2026, Empress Judah circulated an email concerning the GRH launch to a number of individuals and organisations involved or interested in reparatory justice.

Reparation Nation Limited was among the recipients.

The email expressed concern about the apparent lack of prior consultation with longstanding grassroots Black/Afrikan reparations organisations.

It referred to the experience of participants attending the launch and questioned why established community activists had not been invited to contribute their perspectives before the introduction of the GRH.

The correspondence named or referred to organisations and campaigners including Global Afrikan Congress UK, organisers associated with the annual reparations march in Brixton, the RasTafari movement and other grassroots participants.

The email also reported an exchange concerning the opportunity to ask questions during the launch session.

Empress Judah stated that Charmaine Simpson had responded to her question about consultation by saying, "you are being informed now".

This statement is recorded as Empress Judah's account of the exchange.

The underlying event may be capable of further verification through recordings, independent witnesses or responses from those present.

The correspondence establishes that Empress Judah expressed dissatisfaction with the consultation and communication arrangements.

It does not establish that every organisation she identified was excluded from all previous communications, nor does it independently establish the intentions of the GRH organisers.

Those questions remain open.

Source: Empress Judah, email dated 18 October 2026, 00:50, subject concerning the London Global Reparation Hub launch at Friends House.

Evidence classification: Contemporaneous attributed account and documentary evidence of expressed community concerns.

3.5. The initial concerns about community consultation

The first email raised questions about why longstanding grassroots reparations organisations had apparently not been informed or consulted before the GRH launch.

The underlying concern was not simply whether invitations had been issued to attend a public event.

It concerned whether organisations with relevant historical experience had been given a meaningful opportunity to contribute to discussions about the formation, purpose, governance and proposed operation of the GRH.

This distinction is significant.

Attendance at a launch is different from participation in the process through which an institution was formed.

Being informed that an organisation exists is different from being consulted about whether, why or how it should exist.

Consultation is also different from endorsement, representation or community consent.

The investigation must therefore establish precisely which organisations were consulted, what consultation meant in practice, when it occurred and how responses were considered.

At the present stage, Empress Judah's correspondence provides evidence of the questions raised and the concerns expressed.

It does not constitute a complete consultation audit.

No finding of deliberate exclusion has been reached.

3.6. The original Black Cultural Centre advertisement

A separate matter concerns the original advertised arrangements for the London GRH launch.

Empress Judah stated that she discovered an Eventbrite listing on 14 October 2026 advertising a launch at the Black Cultural Centre in Islington.

She explained that she circulated the information to reparations organisations and individuals.

According to her subsequent correspondence, the launch arrangements were then changed to the Reparations Conference at Friends House.

The original Eventbrite listing identified the Black Cultural Centre as the advertised venue and subsequently displayed a cancellation status.

These circumstances raise questions about whether the original event was intended to proceed separately, whether a relocation or consolidation occurred, and when the relevant decisions were made.

The existence of an originally advertised venue must be distinguished from proof that a completed booking had been made.

Similarly, a cancellation notice does not, without further evidence, establish why an event was cancelled or moved.

The investigation must identify the relevant booking records, event publication history, communications and decisions.

Source for independent examination:

Eventbrite — London Launch of the Global Reparations Hub
https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

The original listing, dates, times, venue details and subsequent amendments should be preserved in the evidence register.

3.7. The second email and the development of a serious suspicion

At 12:28 on Sunday 18 October 2026, Empress Judah circulated a further email.

This correspondence developed the questions surrounding the original Black Cultural Centre advertisement and the subsequent GRH launch at Friends House.

She questioned how the conference could have prepared and printed programmes containing the GRH launch while the original Black Cultural Centre arrangements had also been advertised.

Her email expressly raised the possibility that confusing communications surrounding the launch were intentional.

This is an important development.

The concern was no longer limited to whether event communications had been confusing or inadequate.

It extended to a question about whether the apparently inconsistent arrangements may have resulted from deliberate decisions.

The precise question of intention remains unresolved.

The investigation has not established that the Black Cultural Centre was a dummy venue, a deliberate distraction or part of any plan to mislead the community.

Nevertheless, Empress Judah's correspondence establishes that a serious question about intention had been raised.

That question must be preserved accurately rather than weakened into a merely administrative issue or strengthened into an allegation that deliberate deception occurred.

Source: Empress Judah, email dated 18 October 2026, 12:28, subject beginning *Ref: London Global Reparation Hub launch…*

Evidence classification: Contemporaneous correspondence documenting a serious suspicion and the factual circumstances said to have prompted it.

3.8. Why the Black Cultural Centre suspicion matters

The Black Cultural Centre question is significant because the institution's name and perceived community role may carry cultural, historical and symbolic importance.

Where a reparations initiative is publicly associated with a Black cultural institution, members of the community may reasonably expect that the venue arrangements have been properly authorised and communicated.

If such a venue were knowingly used to create a misleading impression, affected community members could reasonably perceive that conduct as an insult to their dignity and trust.

That possibility deserves serious investigation.

However, the seriousness of a possible insult does not prove that the insult occurred.

The investigation must determine whether the Black Cultural Centre was genuinely approached, whether a booking existed, what the original organisers intended and why the published arrangements changed.

It must also establish when the conference programme was finalised and whether the afternoon launch was planned before, after or independently of the original advertised event.

The answer may reveal a legitimate explanation, an administrative failure, an avoidable communication problem or circumstances requiring further scrutiny.

At present, the evidence does not justify selecting one explanation as an established conclusion.

3.9. The initial rumour concerning Project Spire

During consideration of the GRH launch and the concerns expressed in the correspondence, further information emerged suggesting that Charmaine Simpson was or had been involved with Project Spire.

At the moment this information was raised, the nature and extent of her involvement had not yet been independently established within the investigation.

The information was therefore treated as an unverified investigative lead.

The question was specific and capable of examination.

Had Charmaine Simpson held an identifiable role with the Church Commissioners' Project Spire-related activities?

If so, what was the role, during what period was it held, and what responsibilities did it involve?

The existence of such a role could be relevant to understanding possible institutional relationships, external responsibilities and safeguards.

However, the question did not presume that holding two roles was improper.

Nor did it presume that any responsibilities relating to Project Spire extended to the organisation or administration of the GRH.

The initial rumour supplied a direction for research, not a conclusion.

3.10. The discovery that materially changed the evidential position

Subsequent examination of published records identified material produced for the Diocese of Southwark's February 2026 event, *Truth-telling in sacred spaces*.

The programme included biographical information identifying Charmaine Simpson as working in research and engagement for the Church Commissioners in relation to historical connections with African chattel enslavement.

The independently published conference programme for 17 October 2026 identified Charmaine Simpson as a participant in the Global Reparations Hub launch.

These records materially changed the investigation.

The specific suggestion that Charmaine Simpson was associated with both areas of activity was no longer unsupported.

It had a documentary basis.

This is the point at which an initially unsubstantiated rumour acquired a strong factual foundation.

That foundation concerns the existence of overlapping involvement.

It does not extend automatically to allegations about motive, management decisions, financial relationships, deliberate exclusion or institutional wrongdoing.

Independent verification sources:

Diocese of Southwark — *Truth-telling in sacred spaces*, February 2026: https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

UK Reparations Conference 2026 — Official Agenda: https://www.appg-ar.org/uk-reparations-conference-2026-agenda

3.11. The distinction between substantiated overlap and unsubstantiated wrongdoing

This distinction is fundamental to the credibility of the investigation.

The published evidence supports the proposition that Charmaine Simpson had a documented Church Commissioners research and engagement role and was separately involved in the GRH launch.

The evidence does not, by itself, establish that the Church Commissioners directed the GRH launch.

It does not establish that Project Spire funded the GRH.

It does not establish that Charmaine Simpson controlled the GRH's consultation or venue arrangements.

It does not establish that she had authority over Project Spire's proposed £100 million fund.

It does not establish that any overlapping activities constituted an undeclared conflict of interest.

Those propositions require separate investigation.

The report must therefore avoid converting evidence of professional or organisational association into a conclusion about institutional control or individual responsibility.

The precise purpose of the next investigative phase is to establish these boundaries.

3.12. Kwesi Ochosi and the further documentary lead

The published GRH conference programme identifies Kwesi Ochosi as chair of the launch session.

Separately, published information concerning an April 2026 event at Lambeth Palace Library identifies Charmaine Simpson and Kwesi Ochosi as participants in a programme concerning Church of England Black history and historical records.

This provides a further documentary lead concerning participation in related public discussions.

It may be relevant to understanding how individuals involved in reparations discussions came to know one another or participate in overlapping events.

However, the fact that two individuals appeared in a published event programme does not establish a contractual relationship, common institutional authority or shared financial responsibility.

The investigation must establish whether Kwesi Ochosi held any formal Project Spire role or whether his participation was confined to external events and separate reparations activities.

Relevant public research lead:

Lambeth Palace Library — *Routes in the Records II: Church of England's Black History at the Archives*, 11 April 2026.

The original published programme, including participant names and roles, should be preserved in the evidence bundle.

3.13. Empress Judah's request to investigate Project Spire

In her second email of 18 October 2026, Empress Judah expressly requested that John Canoe examine the Church of England's Project Spire fund.

Her questions included how and when economic reparatory justice might become available to independent Black/Afrikan grassroots reparations organisations.

She also requested examination of the management and access arrangements of the Black Cultural Centre in Islington.

These were related requests arising from the same correspondence but concerning different institutions.

The Project Spire request formed part of the circumstances leading Reparation Nation Limited to commence this separate investigation.

The request did not establish that the Church Commissioners had acted improperly.

It did establish that a person engaged in grassroots reparations campaigning was asking for further information about the programme and its potential beneficiaries.

The subsequent discovery of documented overlapping involvement provided a more specific investigative trigger than the request alone.

This sequence is important because it shows how the investigation developed rather than presenting the existence of an investigation as proof that an institution had already failed.

3.14. The community concern: what is established

The correspondence demonstrates that concerns were expressed by Empress Judah and that those concerns were circulated to a number of community contacts and organisations.

The email also refers to exchanges involving other conference participants.

This constitutes evidence that questions about the launch were being raised within an identifiable network of people concerned with reparatory justice.

It does not establish that the whole Black/Afrikan community shares those concerns.

It does not establish the precise number of people who agree or disagree.

Nor does it establish that every organisation named in the correspondence authorised Empress Judah to speak on its behalf.

The investigation will therefore use careful expressions such as *concerns expressed within parts of the Black/Afrikan reparations community* unless broader representative evidence becomes available.

This approach does not diminish the seriousness of the concerns.

It preserves their evidential meaning.

3.15. Possible explanations that must remain open

A professional investigation must remain capable of considering explanations that differ from the original suspicion.

In relation to the GRH launch, the arrangements could have involved a genuine venue change, two originally separate events, consolidation of activities, late alterations, administrative errors or other circumstances not yet identified.

Some explanations may eventually be supported by records.

Others may be excluded by evidence.

No explanation should be selected merely because it appears convenient to an institution or consistent with an initial suspicion.

In relation to the personnel overlap, Charmaine Simpson's involvement may have arisen through distinct professional and community roles with no shared institutional control.

Alternatively, further documents may reveal formal arrangements requiring examination.

The appropriate next step is to obtain the relevant records and explanations rather than assume either position.

3.16. Why apparently administrative matters require serious examination

In ordinary circumstances, an event venue change might appear to be a relatively minor organisational matter.

In the context of reparatory justice, however, the significance of an event may extend beyond its immediate logistical arrangements.

The launch of an organisation presented as a reparations hub can raise important expectations about representation, leadership, consultation and access to information.

Where people believe they have been excluded from discussions affecting a movement to which they have contributed for decades, unclear communications may intensify mistrust.

Where the name of a culturally significant institution is involved, questions about whether it was properly consulted or authorised may have additional importance.

Where individuals involved in the event also have documented roles in a separate reparations programme associated with a substantial financial commitment, further questions about institutional responsibilities may arise.

The investigation therefore considers the organisational details relevant to public confidence.

Their relevance does not establish wrongdoing.

It explains why they should be examined carefully.

3.17. The danger of allowing misunderstandings to accumulate

Reparation Nation Limited maintains that transparency and competent organisation are essential safeguards for maintaining peace.

Unanswered questions can circulate through communities and acquire meanings that were not intended by those originally involved.

Rumours may become more serious as they are repeated.

Conversely, dismissing concerns without providing evidence may further undermine confidence.

The preferred response is early clarification.

Accurate records, clear lines of responsibility, timely communication and fair opportunities to ask questions can help prevent unnecessary confrontation.

This is particularly important where large financial commitments and deeply held historical grievances are involved.

The investigation therefore seeks to identify problems before they become more difficult to resolve.

3.18. Violence and threats of violence: a preventative consideration

The possible escalation of disputes into intimidation, threats of violence or physical violence must be recognised as a serious preventative concern across all reparations matters.

Historical enslavement itself involved profound violence.

Contemporary reparatory initiatives may involve deep grief, disagreement, substantial resources and expectations concerning justice and recognition.

These circumstances warrant careful institutional risk assessment.

They do not justify assuming that dissatisfied community members are violent or that criticism will lead to violence.

The investigation does not claim that any participant in the GRH launch threatened violence.

Nor does it assert that violence is imminent.

Its position is that high-quality organisation, transparent communication, accessible complaints procedures and early resolution of disputes are sensible measures for preventing escalation.

References to violence are therefore preventative, not threatening.

No person is being encouraged, threatened or pressured through the prospect of violence.

3.19. The importance of the proposed £100 million commitment

Project Spire's proposed £100 million financial commitment increases the importance of understanding the programme's governance and decision-making arrangements.

The existence of a substantial commitment does not mean that the funds have already been distributed.

The investigation must distinguish between money committed, formally allocated, transferred, invested and received by identifiable beneficiaries.

Similarly, participation in Project Spire-related research or consultation must not be mistaken for authority over financial decisions.

However, where communities may eventually seek access to grants, investment opportunities or other reparatory benefits, it is reasonable to ask who makes decisions, what criteria apply and how accountability is maintained.

Early clarification of these matters can help prevent misunderstandings about entitlement, representation and access.

The investigation will not imply that a person associated with both Project Spire and GRH possesses financial authority unless documentation establishes that authority.

3.20. The decision to open a separate Project Spire investigation

After the documentary evidence of overlapping involvement was identified, Reparation Nation Limited determined that the Project Spire questions warranted a separate investigation.

This decision was made to preserve institutional clarity.

The GRH investigation concerns the launch, formation, identity, consultation and governance of the hub.

The Project Spire investigation concerns the Church Commissioners' reparatory programme, including the documented involvement of relevant individuals, governance arrangements, financial structure, consultation and safeguards.

The Black Cultural Centre enquiry concerns the Centre's own management and the circumstances surrounding its appearance in the original venue advertisement.

The existence of common individuals or events may justify cross-referencing evidence.

It does not justify merging all three subjects into one institutional accusation.

Separate investigations allow clearer questions and fairer assessments.

3.21. Evidence status at the opening of the investigation

The current position can be summarised as follows.

Established through documentary evidence: The GRH launch appeared in the published conference programme; Charmaine Simpson was identified as a participant; published Church-related material identified her research and engagement work with the Church Commissioners; Empress Judah circulated correspondence raising specific concerns.

Established through attributed correspondence: Empress Judah reported dissatisfaction with prior consultation, described questions raised during the launch, identified the original Black Cultural Centre advertisement and questioned the subsequent change in arrangements.

Supported investigative lead: Published event material identifies both Charmaine Simpson and Kwesi Ochosi as participants in an earlier Church-history event.

Unresolved suspicion: The possibility that the Black Cultural Centre was knowingly used as a misleading or diversionary advertised venue.

Unanswered institutional questions: Whether GRH and Project Spire have formal relationships, what relevant individuals' responsibilities are, how overlapping roles are managed and whether Project Spire's safeguards are adequate.

These categories must remain separate throughout subsequent sections.

3.22. The responsibilities of Reparation Nation Limited

Having identified documentary support for the initial personnel-overlap rumour, Reparation Nation Limited has a responsibility to handle the findings carefully.

It must not overstate the evidence.

It must not conceal relevant facts merely because they may be uncomfortable for an institution.

It must not convert suspicion into accusation or treat institutional silence as automatic confirmation.

It must give named individuals a fair opportunity to explain their roles.

It must preserve the possibility that further evidence may correct the initial interpretation.

It must also recognise that the public may rely upon the investigation when forming opinions about important reparations initiatives.

For this reason, sources should be accessible, terminology should be understandable and evidential limitations should be plainly stated.

The purpose is to make the investigation capable of independent scrutiny.

3.23. Why the Church Commissioners should be informed

The Church Commissioners have a legitimate institutional interest in knowing that questions have arisen concerning the documented participation of a person associated with their reparatory work in an external reparations initiative.

Informing them is not equivalent to accusing them of responsibility for that initiative.

It provides an opportunity to clarify the individual's role, explain relevant institutional boundaries and identify applicable governance and safeguarding arrangements.

The Commissioners may have information capable of resolving particular questions.

They may also be able to confirm that certain matters fall entirely outside their responsibilities.

Either answer would assist the investigation.

The proposed communication should therefore identify the verified documentary overlap, accurately describe the community concerns and invite clarification without presenting unresolved suspicions as conclusions.

This is especially appropriate while the proposed fund's future operational arrangements remain under development.

3.24. The central lesson from the original rumours

The progression from rumour to evidence demonstrates why early, independent examination is important.

Had the original information been accepted without verification, the investigation might have made unsupported claims.

Had it been dismissed merely because it began as a rumour, a relevant documentary connection could have been overlooked.

The investigation instead pursued identifiable records.

That process established the factual basis of the apparent overlapping involvement and produced more precise questions.

The resulting investigation is therefore stronger than one founded only on suspicion.

It also remains narrower than an investigation claiming to have established misconduct.

The discovery of evidence changed the status of the personnel-overlap rumour. It did not change every associated suspicion into a proven fact.

This distinction is essential to the integrity of the entire report.

3.25. Conclusion: why the original rumours must remain part of the documentary history

The original rumours and concerns are not incidental background information.

They explain why the investigation began, what questions were initially uncertain and how subsequent research developed.

Their inclusion allows readers to understand the difference between the circumstances that prompted enquiry and the evidence obtained afterwards.

The documented involvement of Charmaine Simpson in Church Commissioners research and engagement work and the GRH launch establishes a factual basis for examining institutional boundaries and responsibilities.

The correspondence from Empress Judah establishes that concerns about consultation, communications and venue arrangements were expressed immediately following the launch.

The Black Cultural Centre suspicion remains serious but unverified.

These matters justify further professional investigation without predetermined findings.

Reparation Nation Limited will therefore proceed by identifying responsible institutions, examining original documents, inviting explanations, testing apparent contradictions and preserving corrections.

The purpose is to replace rumour with evidence, uncertainty with clarification, and avoidable mistrust with transparency and competent organisation wherever the facts permit.

SOURCES AND INDEPENDENT VERIFICATION

Source 3.1 — UK Reparations Conference 2026

Official conference agenda.

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant evidence: Global Reparations Hub launch, 17 October 2026, 14:25; named participants and chair.

Source 3.2 — Diocese of Southwark

Truth-telling in sacred spaces, February 2026 programme.

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

Relevant evidence: Charmaine Simpson's Church Commissioners research and engagement work and Black History Studies position.

Source 3.3 — Eventbrite

London Launch of the Global Reparations Hub, 17 October 2026.

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

Relevant evidence: Original publicly advertised venue and event arrangements. Earlier versions and amendments require preservation.

Source 3.4 — Church Commissioners for England

Official Project Spire enquiry page.

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Relevant evidence: Programme implementation status and official engagement arrangements.

Source 3.5 — Church Commissioners for England

Fund for Healing, Repair and Justice — Frequently Asked Questions.

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Relevant evidence: Proposed programme model, funding commitment and public explanation.

Source 3.6 — Empress Judah

Email dated 18 October 2026 at 00:50 concerning the London GRH launch.

Relevant evidence: Attributed account of launch discussions, questions about grassroots consultation, venue changes and community concerns.

Status: Private correspondence held in the investigation record.

Source 3.7 — Empress Judah

Follow-up email dated 18 October 2026 at 12:28 concerning the GRH launch, Black Cultural Centre, Project Spire and related matters.

Relevant evidence: The question about printed conference programmes, possible intentional confusion and the request for a Project Spire investigation.

Status: Private correspondence held in the investigation record.

Source 3.8 — Lambeth Palace Library

Routes in the Records II: Church of England's Black History at the Archives, 11 April 2026.

Relevant evidence: Published event participation involving Charmaine Simpson and Kwesi Ochosi.

Status: Original event material remains to be preserved in the evidence bundle with its direct verification link.

END OF SECTION 3 — THE ORIGINAL RUMOURS: THEIR ORIGIN, CONTENT, ATTRIBUTION AND INITIAL EVIDENTIAL STATUS

NEXT: SECTION 4 — THE INVESTIGATIVE BREAKTHROUGH: HOW DOCUMENTARY EVIDENCE SUBSTANTIATED THE APPARENT PERSONNEL OVERLAP.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 4 OF 24

THE INVESTIGATIVE BREAKTHROUGH: HOW DOCUMENTARY EVIDENCE SUBSTANTIATED THE APPARENT PERSONNEL OVERLAP

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Documentary connections identified; institutional relationships, contractual responsibilities and decision-making authority remain under investigation.

4.1. Purpose of this section

This section documents the investigative development that transformed an initially unsubstantiated rumour concerning possible overlapping involvement between Project Spire and the Global Reparations Hub into a specific enquiry supported by published documentary evidence.

The development is significant because it demonstrates the value of testing community information against independently identifiable sources.

The original information suggested that Charmaine Simpson, who was involved in the London Global Reparations Hub launch on 17 October 2026, was or had been involved with the Church of England's Project Spire.

At the time this information was first raised within the investigation, its accuracy and significance had not yet been established.

It was therefore treated as a research lead.

Subsequent examination of Church-related publications and the official UK Reparations Conference programme established a documentary basis for the suggested overlapping involvement.

Further research identified an earlier event at Lambeth Palace Library involving both Charmaine Simpson and Kwesi Ochosi.

The investigation must now determine the nature, scope and institutional significance of those documented activities.

The breakthrough establishes a connection through identifiable individuals and public activities. It does not, by itself, establish shared governance, financial control, misconduct or institutional wrongdoing.

4.2. The original uncertainty

The initial question was whether Charmaine Simpson had any identifiable involvement with Project Spire.

This mattered because her involvement with the Global Reparations Hub launch was already a subject of community discussion.

Empress Judah's correspondence of 18 October 2026 described concerns about the launch, including consultation, communication and the original advertised arrangements involving the Black Cultural Centre in Islington.

Those concerns prompted questions about the individuals responsible for the launch and their other institutional activities.

The suggestion of an association with Project Spire required documentary investigation because it concerned a programme involving the Church Commissioners and a proposed £100 million reparatory funding commitment.

At the initial stage, RNL did not possess sufficient evidence to establish the reported connection.

No conclusion could properly be drawn about Charmaine Simpson's relationship with the Church Commissioners or the nature of any responsibilities she held.

The first objective was therefore narrowly defined: identify reliable published records capable of confirming or contradicting the suggested professional association.

4.3. Discovery of the Diocese of Southwark publication

A substantial development occurred when published material for the Diocese of Southwark's event, *Truth-telling in sacred spaces*, was identified.

The event took place on 7 February 2026 at Southwark Cathedral.

The programme contains biographical information concerning Charmaine Simpson.

On printed page 9, she is identified as an Engagement Coordinator associated with the Church Commissioners and as Chief Executive Officer of Black History Studies.

Her biography describes her research and engagement responsibilities concerning the Church of England's historical connections to African chattel enslavement.

This information matters because it comes from an identifiable Church-related institutional publication rather than an unattributed community rumour.

It establishes that Charmaine Simpson had a publicly documented professional role associated with Church Commissioners work directly relevant to the historical subject addressed by Project Spire.

The record provides a strong basis for asking the Church Commissioners to clarify the role's exact programme relationship, contractual status, dates, responsibilities and authority.

It does not, by itself, establish that she was a trustee, fund manager or person authorised to approve financial distributions.

Primary documentary source:

Diocese of Southwark — *Truth-telling in sacred spaces*, February 2026, printed page 9.

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

4.4. Significance of the Church Commissioners role

The Church Commissioners are the institution publicly associated with Project Spire and the proposed Fund for Healing, Repair and Justice.

Research into the historical relationship between the Church Commissioners' predecessor bodies and African chattel enslavement forms part of the background to the reparatory programme.

Consequently, a published role involving research and engagement concerning those historical connections is directly relevant to an investigation examining Project Spire's development, consultation and institutional responsibilities.

However, the relationship must be described precisely.

The Diocese of Southwark publication identifies Charmaine Simpson's work with the Church Commissioners.

The publication does not establish every aspect of her contractual relationship or the complete boundaries of her responsibilities.

It is therefore appropriate to say that there is documented involvement in Church Commissioners research and engagement work relevant to Project Spire.

The investigation will seek further confirmation of how that work was organised, supervised and connected to the programme's formal decision-making arrangements.

This distinction prevents the report from attributing powers or responsibilities that have not yet been evidenced.

4.5. Independent confirmation of participation in the GRH launch

A separate published source identifies Charmaine Simpson's involvement with the Global Reparations Hub launch.

The official UK Reparations Conference 2026 agenda records the London launch of the Global Reparations Hub at Friends House on Saturday 17 October 2026.

The programme identifies the launch session as beginning at 14:25.

Kwesi Ochosi is named as chair.

Charmaine Simpson appears among the participants and is identified through her position as CEO of Black History Studies.

This source establishes a publicly documented association with the launch.

Its significance is that it is distinct from the Diocese of Southwark programme.

The two records therefore provide separate documentary support for involvement in two areas of reparatory activity.

The evidence does not depend solely upon recollections of conference participants.

At the same time, the official conference agenda does not establish Charmaine Simpson's precise responsibility for forming or managing the Global Reparations Hub.

That remains a separate question.

Primary documentary source:

APPG for Afrikan Reparations — UK Reparations Conference 2026 Agenda, 17 October 2026.

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant heading: *London Launch of the Global Reparations Hub*.

4.6. The point at which the original rumour acquired a factual basis

The original rumour suggested that an individual involved in the Global Reparations Hub launch also had involvement in Project Spire-related work.

The Diocese of Southwark publication establishes a Church Commissioners research and engagement connection.

The UK Reparations Conference programme establishes participation in the GRH launch.

When considered together, these independently identifiable records substantiate the central proposition that Charmaine Simpson had documented involvement across the relevant areas of activity.

This is the investigative breakthrough.

Before those records were located, RNL had an unverified lead.

After their identification, RNL had a documentary basis for the overlap.

The evidential status of the original information had therefore changed.

It was no longer appropriate to describe the entire suggested association as unsupported rumour.

It was equally inappropriate to conclude that the documentary overlap established improper conduct.

The verified finding concerns involvement and association.

Further propositions concerning institutional authority, formal partnerships, financial arrangements or individual responsibility require additional evidence.

4.7. What the evidence proves and what it does not prove

The two published records establish an identifiable connection through Charmaine Simpson's named roles and participation.

They support a legitimate enquiry into institutional relationships and responsibilities.

They do not independently prove that the Church Commissioners sponsored, financed, controlled or authorised the Global Reparations Hub launch.

They do not prove that Project Spire and the GRH share a governing body.

They do not prove that Charmaine Simpson exercised financial authority over the proposed £100 million fund.

They do not prove that her participation in the GRH launch was undertaken on behalf of the Church Commissioners.

They do not establish that she personally made every decision about the launch's consultation, venue, publicity or communications.

These limitations must remain explicit.

A strong investigation is not one that assigns the maximum possible significance to every discovery.

It is one that identifies exactly what the evidence establishes and then asks the next appropriate questions.

4.8. A further discovery: the Lambeth Palace Library event

Further research identified the event *Routes in the Records II: Church of England's Black History at the Archives*, advertised for Saturday 11 April 2026 at Lambeth Palace Library.

The published event programme names Charmaine Simpson as delivering opening remarks in her capacity as Research and Engagement Coordinator.

It also identifies Kwesi Ochosi as a speaker presenting on the historical relationship between Bussa's Rebellion and international law.

This is a further documentary connection.

It establishes that both individuals were named participants in the same Church-history event several months before the October GRH launch.

This finding is relevant because Kwesi Ochosi was subsequently identified as chair of the GRH launch.

However, the event programme alone does not establish that the two individuals organised the April event jointly or that they held common managerial responsibilities.

It does not establish that Kwesi Ochosi was employed by the Church Commissioners.

Nor does it establish that Project Spire directed the later GRH launch.

The precise finding is that the two individuals were publicly named in the same programme concerning Church of England Black history.

Independent verification sources:

Routes in the Records II: Church of England's Black History at the Archives, 11 April 2026:

https://happeningnext.com/event/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-eid1ef0kundmm9a

Alternative event record:

https://www.ianvisits.co.uk/calendar/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-429053/

4.9. Chronological significance of the April and October events

The April and October records establish a chronological sequence of documented public involvement.

In February 2026, Charmaine Simpson was identified in a Church-related programme as undertaking research and engagement work associated with the Church Commissioners.

In April 2026, she and Kwesi Ochosi were listed in the programme of an event concerning Church of England Black history at Lambeth Palace Library.

In October 2026, the official UK Reparations Conference programme identified Kwesi Ochosi as chair and Charmaine Simpson as a participant in the GRH launch.

This sequence is relevant to determining whether any professional or organisational relationships existed before the October launch.

However, repeated participation in related public events can arise through ordinary professional, academic or community networks.

The sequence must not be presented as proof that the GRH was developed through Project Spire or that the Church Commissioners exercised institutional control over the initiative.

It provides grounds for further questions about the precise nature of the relationships.

4.10. Black History Studies and the question of organisational capacity

The documentary evidence identifies Charmaine Simpson as CEO of Black History Studies.

The official conference programme lists her in that capacity during the GRH launch.

The original Eventbrite advertisement associated with the separate Black Cultural Centre launch also identified Black History Studies as an event organiser.

This introduces an important distinction between an individual's professional roles and the responsibilities of an organisation with which that individual is associated.

Charmaine Simpson's involvement in an event through Black History Studies does not automatically make the event an activity of the Church Commissioners.

Equally, the presence of Black History Studies in the advertised event arrangements does not establish the organisation's precise contractual or financial obligations without further records.

The investigation should therefore identify who authorised the use of Black History Studies' name, who administered the Eventbrite listing and who was responsible for communicating any change of arrangements.

These questions belong primarily to the GRH and Black Cultural Centre enquiries.

They are relevant to Project Spire only insofar as they assist in clarifying the capacity in which a person associated with Church Commissioners work participated.

4.11. The importance of distinguishing professional capacities

One person may undertake activities in several capacities.

An individual may be an employee or contractor of one institution, an officer of a separate organisation, a speaker at a public event and a participant in independent community activities.

Each capacity may involve different responsibilities.

The investigation must therefore avoid treating every action undertaken by Charmaine Simpson as an action of the Church Commissioners.

Similarly, Kwesi Ochosi's participation in a Church-history event does not automatically mean that his later GRH activities were conducted on behalf of the Church.

The proper investigation must identify whether any relevant action was performed personally, organisationally, contractually or through delegated institutional authority.

Where documentation does not establish the capacity, clarification should be requested.

This is particularly important where community members may reasonably be uncertain about the institutional relationships.

4.12. The possibility of conflicts of interest

Overlapping professional activities may legitimately prompt questions concerning conflicts of interest.

A conflict of interest may arise where duties, financial interests or other relevant relationships create competing responsibilities or risks to impartial decision-making.

However, the mere existence of overlapping roles does not establish a conflict.

The investigation has not identified evidence sufficient to conclude that Charmaine Simpson or Kwesi Ochosi had an undisclosed conflict of interest.

The appropriate questions concern whether relevant institutional policies exist, whether any declarations were required, whether such declarations were made where appropriate, and how potentially overlapping duties are separated.

Those questions are particularly relevant to consultation, programme recommendations, appointments, procurement, beneficiary selection and financial decisions.

The Church Commissioners should be invited to explain the policies applicable to Project Spire personnel and whether those policies govern external reparations activities.

4.13. Questions concerning financial authority

Project Spire involves a publicly announced £100 million commitment.

That commitment makes it important to distinguish between roles involving research, consultation or public engagement and roles involving financial authority.

The available biographical and event records do not establish that Charmaine Simpson possessed authority to allocate, transfer, invest or distribute Project Spire funds.

Nor do they establish that Kwesi Ochosi exercised financial authority within the programme.

The investigation must not imply otherwise.

Nevertheless, it is legitimate to request an explanation of the programme's financial decision-making structure.

Such an explanation should identify the responsible legal entities, trustees, authorised officers, investment managers and proposed grant-making decision-makers.

It should also explain whether personnel involved in external consultation or community organisations have any formal role in determining financial eligibility or distribution.

The purpose is to establish accountability through evidence rather than assume authority from visibility or public prominence.

4.14. The continuing significance of Empress Judah's correspondence

The documentary breakthrough must be understood alongside the community concerns that prompted the investigation.

Empress Judah's correspondence of 18 October 2026 identifies dissatisfaction with aspects of the GRH launch and questions concerning prior consultation with grassroots reparations organisations.

Her account also describes the original Black Cultural Centre advertisement and subsequent change of arrangements.

Those matters were already legitimate subjects of enquiry before the Church Commissioners connection was independently established.

The discovery of overlapping involvement does not prove the explanation for those difficulties.

It does, however, provide an additional reason to seek clarity about who was acting in which capacity and whether there were relevant institutional relationships.

The correspondence must remain accurately attributed to Empress Judah.

Her reported observations and suspicions must not be presented as findings made independently by RNL unless supporting evidence has been obtained.

4.15. The Black Cultural Centre suspicion remains a separate question

A particularly important safeguard concerns the suspected use of the Black Cultural Centre as a misleading or diversionary venue.

That suspicion arose from questions about the original Eventbrite advertisement, subsequent communications and the presence of the GRH launch in the conference programme.

The discovery of a documented Church Commissioners connection involving Charmaine Simpson does not prove that the Black Cultural Centre was deliberately used in this way.

Nor does it establish that Project Spire had any involvement in venue decisions.

The suspicion nevertheless warrants careful documentary examination because of its potential implications for community trust and dignity.

The appropriate evidence includes the original venue booking records, the Eventbrite publication and amendment history, relevant communications, the conference programme production timeline and explanations from those responsible.

The seriousness of the suspicion must be preserved without converting it into an established finding.

4.16. Why the investigative breakthrough matters to the Church Commissioners

The Church Commissioners may reasonably be expected to understand the public responsibilities associated with their own programme and its communications.

The documented professional involvement of a person associated with Church Commissioners research and engagement work in a separate reparations launch gives rise to questions that the Commissioners may be able to clarify.

These questions include whether the institution knew of the external activities, whether those activities were undertaken independently, and what policies govern the separation of responsibilities.

Informing the Church Commissioners provides an opportunity for clarification and correction.

It does not require an allegation of wrongdoing.

Nor does it presume that the Commissioners were responsible for the GRH launch.

A clear response could reduce uncertainty by explaining the institutional boundaries.

If responsibilities overlap in a formal manner, the Commissioners may be able to identify the relevant arrangements.

If there is no formal relationship, confirmation would also be useful.

4.17. Transparency and the protection of community confidence

The central purpose of examining overlapping involvement is to promote institutional clarity.

Reparations concern profound historical experiences and substantial expectations of justice.

Affected communities may reasonably seek to understand the individuals, organisations and decision-making structures associated with initiatives presented as delivering reparatory benefit.

Confusion about institutional authority can undermine confidence even where no misconduct has occurred.

Clear public information about responsibilities, consultation, programme status and financial arrangements can reduce that uncertainty.

The investigation therefore seeks documentary clarification at an early stage.

The objective is not to discourage individuals from participating in multiple reparations activities.

It is to ensure that relevant professional and institutional relationships are sufficiently transparent to permit informed public scrutiny.

4.18. Preventing the escalation of unresolved concerns

Reparation Nation Limited maintains that competent organisation, transparency and early intervention are important safeguards for keeping the peace.

Concerns about representation, consultation and institutional responsibility should be examined before they become entrenched disputes.

The potential consequences may become greater as reparations programmes develop and substantial financial resources begin changing hands.

The possibility of intimidation, threats of violence or violence must therefore be recognised as a matter for responsible prevention.

This does not constitute a prediction that violence will occur.

Nor does it suggest that people expressing concerns are threatening or violent.

The investigation advocates lawful, peaceful and evidence-based engagement.

The present documentary breakthrough provides an opportunity to replace some uncertainty with verified information and to pursue remaining questions through professional correspondence.

4.19. The importance of an independently verifiable evidence trail

The credibility of this investigation depends upon its ability to demonstrate how findings were reached.

Every important source should therefore be identified by title, issuing body, date and direct link wherever possible.

The Diocese of Southwark programme provides a specific biographical source.

The UK Reparations Conference agenda provides an official source concerning the October GRH launch.

The Lambeth Palace Library event listing provides a further research lead concerning the April 2026 event.

The original Eventbrite advertisement and Empress Judah's correspondence provide additional evidence concerning the launch arrangements and questions raised.

Each source performs a different evidential function.

The investigation must not use one source to prove propositions that it does not address.

For example, a programme identifying a speaker cannot establish that speaker's complete contractual responsibilities.

This discipline will be maintained throughout the full reference investigation.

4.20. The need to preserve historical versions of source material

Public webpages and event listings may change.

An event advertisement may be updated, cancelled or removed.

A conference programme may be revised.

A person's professional biography may change following an appointment or departure.

The investigation should therefore preserve copies of relevant source material, including access dates and any available publication dates.

Where multiple versions of a document exist, they should be compared rather than silently substituted.

This is particularly important to the Black Cultural Centre question, where the sequence of publication and amendments may be essential to understanding what occurred.

It is also important when considering historical professional roles.

A document published in February 2026 establishes a publicly described role at that time; it does not automatically establish that every responsibility continued unchanged in October.

Historical and current status must be distinguished.

4.21. Key questions arising directly from the breakthrough

The investigation will seek written clarification of the following matters.

First, what precise role did Charmaine Simpson hold with the Church Commissioners, during which dates, and under what authority?

Second, what was the relationship between her research and engagement responsibilities and Project Spire's governance and consultation arrangements?

Third, was her participation in the Global Reparations Hub launch undertaken independently, through Black History Studies, or in any authorised Church Commissioners capacity?

Fourth, were any declarations or approvals concerning overlapping external activities required by applicable policies?

Fifth, did Kwesi Ochosi hold any formal advisory, contractual, consultation or governance role in Project Spire?

Sixth, is there any documented institutional, financial or contractual relationship between Project Spire and the Global Reparations Hub?

Seventh, what arrangements exist to ensure that community engagement personnel do not exercise undeclared or inappropriate influence over beneficiary selection or financial decisions?

Eighth, how can members of the public obtain accurate information about the responsibilities and authority of individuals participating in Project Spire-related activities?

These questions arise from the documentary evidence and do not depend upon an assumption of wrongdoing.

4.22. The right of reply and the possibility of correction

Charmaine Simpson, Kwesi Ochosi, the Church Commissioners and other relevant persons or organisations should have a fair opportunity to clarify their roles.

An institution may possess information not currently available publicly.

A published biography may simplify a more complex professional relationship.

A conference programme may identify a person's public capacity without describing their organisational responsibilities.

These possibilities must remain open.

If responses establish that any initial interpretation requires correction, the investigation should make that correction transparently.

If additional documents establish a formal relationship, that finding should be recorded.

If a suggested relationship is contradicted by reliable evidence, that outcome should also be recorded.

The purpose is to establish the facts rather than preserve a preferred theory.

4.23. Preliminary assessment of the evidence

The available documentary evidence supports three principal findings.

First, Charmaine Simpson was publicly identified in February 2026 as undertaking research and engagement work for the Church Commissioners relating to the history of African chattel enslavement.

Second, she was identified as a participant in the Global Reparations Hub launch at the UK Reparations Conference on 17 October 2026.

Third, Charmaine Simpson and Kwesi Ochosi were named in the published programme for the April 2026 Lambeth Palace Library event concerning Church of England Black history.

These findings substantiate the existence of overlapping participation in relevant public and professional activities.

The evidence does not yet establish the complete institutional relationships between Project Spire, the Global Reparations Hub and the organisations associated with those individuals.

Nor does it establish deliberate wrongdoing.

The next investigative stage must therefore focus on responsibilities, authority, institutional boundaries and the chronology of relevant activities.

4.24. The investigative significance of the transition from rumour to evidence

The importance of the breakthrough extends beyond the identification of particular individuals.

It demonstrates how a concern originating within community discussion can be subjected to systematic documentary examination.

Initially, the suggestion of overlapping involvement was uncertain.

Research produced institutional publications and official event records identifying relevant activities.

Those records supported the central factual proposition.

That support justified more precise institutional questions.

The resulting investigation is no longer based solely upon the original rumour.

It is based upon a documented association whose significance remains to be established.

The correct investigative progression is rumour, research lead, source identification, documentary verification, specific questions, institutional response and evidence-based findings.

Each stage must remain visible to readers.

That transparency protects the investigation from both unsupported speculation and premature dismissal.

4.25. Conclusion: what the breakthrough establishes

The investigation began with uncertainty concerning possible overlapping involvement between individuals associated with the Global Reparations Hub launch and Project Spire-related work.

The subsequent discovery of published Church-related material and the official UK Reparations Conference programme substantiated an important factual element of that original information.

Charmaine Simpson's documented research and engagement role with the Church Commissioners and her participation in the Global Reparations Hub launch provide a legitimate basis for investigating the precise nature of her responsibilities and institutional relationships.

The additional April 2026 event material identifying Charmaine Simpson and Kwesi Ochosi establishes a further relevant public connection.

These findings justify continuing the investigation.

They do not establish that Project Spire and the GRH share governance, funding or management, that the Black Cultural Centre was deliberately used as a diversion, or that any individual has acted improperly.

Those matters remain subject to documentary clarification.

Reparation Nation Limited will therefore proceed independently, rigorously and professionally, preserving the original evidence, seeking explanations and distinguishing findings from suspicions.

The central significance of this section is that an initially unsubstantiated community rumour was tested and found to contain a substantial, independently documented factual basis.

The task now is to establish what that documented involvement means in terms of actual authority, institutional responsibility, transparency and accountability.

SOURCES AND INDEPENDENT VERIFICATION

Source 4.1 — Diocese of Southwark, February 2026

Truth-telling in sacred spaces.

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

Relevant location: Printed page 9.

Evidence: Charmaine Simpson's published Church Commissioners research and engagement role and Black History Studies position.

Source 4.2 — APPG for Afrikan Reparations, 17 October 2026

UK Reparations Conference 2026 Agenda.

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant heading: *London Launch of the Global Reparations Hub*.

Evidence: Kwesi Ochosi identified as chair and Charmaine Simpson named among participants.

Source 4.3 — Lambeth Palace Library event, 11 April 2026

Routes in the Records II: Church of England's Black History at the Archives.

https://happeningnext.com/event/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-eid1ef0kundmm9a

Evidence: Charmaine Simpson listed for opening remarks and Kwesi Ochosi listed as a presenter.

Source 4.4 — Independent event listing, 11 April 2026

https://www.ianvisits.co.uk/calendar/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-429053/

Purpose: Additional record of the event programme and participants.

Source 4.5 — Charmaine Simpson's public event announcement

https://www.linkedin.com/posts/blackhistorystudies_free-event-routes-in-the-records-ii-church-activity-7446982611123654658-HHCG

Purpose: Public announcement promoting the April 2026 Church-history event, including Kwesi Ochosi's scheduled presentation.

Source 4.6 — Empress Judah correspondence, 18 October 2026

Emails dated 00:50 and 12:28.

Evidence: Original community concerns, questions concerning the GRH launch, the Black Cultural Centre venue arrangements and the request for further investigation.

Status: Correspondence preserved within the RNL investigation record. No public link established.

Source 4.7 — Church Commissioners for England

Fund for Healing, Repair and Justice — Frequently Asked Questions.

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Purpose: Institutional background concerning Project Spire, the proposed fund and its financial arrangements.

END OF SECTION 4 — THE INVESTIGATIVE BREAKTHROUGH: HOW DOCUMENTARY EVIDENCE SUBSTANTIATED THE APPARENT PERSONNEL OVERLAP

NEXT: SECTION 5 — CHRONOLOGY OF EVENTS AND DISCOVERIES: FROM THE EARLY CHURCH-RELATED ACTIVITIES TO THE GLOBAL REPARATIONS HUB LAUNCH AND THE OPENING OF THE PROJECT SPIRE INVESTIGATION.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 5 OF 24

CHRONOLOGY OF EVENTS AND DISCOVERIES: FROM CHURCH-RELATED REPARATIONS ACTIVITIES TO THE GLOBAL REPARATIONS HUB LAUNCH AND THE OPENING OF THE PROJECT SPIRE INVESTIGATION

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Preliminary documentary chronology — further records and institutional clarification required.

5.1. Purpose and importance of the chronology

This section establishes the chronological foundation of the Project Spire investigation.

Its purpose is to identify when relevant developments occurred, when they became known to Reparation Nation Limited, which documentary sources support them, and which questions remain unanswered.

An accurate chronology is particularly important because the investigation concerns several distinct organisations, events and individuals whose activities may overlap without necessarily sharing the same institutional responsibilities.

The central questions concern Project Spire, the Church Commissioners for England, Charmaine Simpson, Kwesi Ochosi, the Global Reparations Hub (GRH), Black History Studies, the Black Cultural Centre in Islington and the UK Reparations Conference held on 17 October 2026.

These entities and activities must not be conflated.

The investigation must distinguish between the historical development of Project Spire, earlier Church-related engagement activities, preparations for the GRH launch, the events of 17 October, subsequent community correspondence and RNL's discovery of the relevant documentary connections on 18 October.

Particular attention will be given to the difference between the date an event occurred and the date evidence concerning that event was located.

This distinction prevents later discoveries from being incorrectly presented as information already known to participants at the time.

5.2. Chronological methodology and evidential standards

The chronology relies upon identifiable documentary sources, including official Church of England publications, the Diocese of Southwark programme, published event listings, the UK Reparations Conference agenda and correspondence provided to Reparation Nation Limited.

Where a published programme identifies a scheduled activity, the chronology records the scheduled activity. It does not automatically establish that every advertised participant attended or that every programmed event occurred precisely as advertised.

Where a correspondent reports personally observing an event, the chronology records the report as an attributed account unless independently verified.

Where documentary evidence establishes a person's involvement in two different activities, the chronology records that involvement without automatically inferring a formal institutional relationship.

Where the original date of publication, amendment or transmission has not been independently established, the uncertainty must remain visible.

This is especially important concerning the Global Reparations Hub launch advertisement and the apparent discrepancy between the Black Cultural Centre and Friends House arrangements.

The chronology is intended to be capable of revision when further original records become available.

5.3. Historical background: Project Spire before the October 2026 events

Project Spire arose from the Church Commissioners' examination of the historical connections between predecessor bodies and African chattel enslavement.

Published Church of England material describes a reparatory response associated with a proposed £100 million commitment over nine years.

The proposed Fund for Healing, Repair and Justice was developed in response to that historical research and subsequent recommendations concerning the Church Commissioners' responsibilities.

The programme has involved discussion of investment, potential grant-making, research, institutional accountability and the practical response to the continuing consequences of historical enslavement.

For the purposes of this investigation, the existence of the proposed £100 million fund is an established institutional fact.

It is not evidence that the full amount has been distributed.

Nor does the existence of the programme establish any institutional relationship with the later Global Reparations Hub.

The chronology must therefore begin by recognising that Project Spire was already an established Church Commissioners initiative before the events surrounding the GRH launch in October 2026.

Primary reference:

Church Commissioners — Fund for Healing, Repair and Justice, Frequently Asked Questions.

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

5.4. November 2025: Church of England Black-history archive engagement

Published material associated with Charmaine Simpson identifies an earlier programme titled *Routes in the Records: Church of England's Black History at the Archives*.

The account describes a public engagement event held at Lambeth Palace Library on 1 November 2025.

It also refers to a later online version of the event.

Of particular investigative importance, the published account identifies Kwesi Ochosi as a **Project Coordinator and Archivist** and describes his presentation concerning Bishop Samuel Crowther.

This is a significant documentary lead.

It indicates that Kwesi Ochosi's involvement in Church-related Black-history engagement activities extended beyond appearing as a speaker at the April 2026 Lambeth Palace Library event.

However, the expression *Project Coordinator and Archivist* requires clarification.

The published account does not, by itself, establish the identity of his contractual employer, the project under which he worked, the source of his remuneration, the extent of his authority or whether his responsibilities formed part of Project Spire's formal organisational structure.

It would therefore be premature to describe him as a Project Spire decision-maker or fund officer.

Nevertheless, the record provides a specific reason to request clarification of his professional relationship with the relevant Church-history programme.

Documentary reference:

Charmaine Simpson — Public account of *Routes in the Records* and the subsequent online session.

https://www.linkedin.com/posts/blackhistorystudies_lambethpalacelibrary-churchofengland-churchcommissioners-activity-7399945016523145216-SAcQ

The original publication timestamp and any relevant associated programme documentation should be retained in the evidence library.

5.5. January 2026: Public institutional accountability concerning the proposed fund

On 19 January 2026, the Church Commissioners published a response to parliamentarians concerning the proposed Fund for Healing, Repair and Justice.

The statement addressed the Commissioners' intentions, the purpose of the programme and questions about the proposed use of charitable resources.

It is relevant because it demonstrates that Project Spire was already subject to institutional and public scrutiny before the October GRH launch.

The investigation should distinguish the Church Commissioners' stated position from any independent assessment of whether their proposed arrangements are sufficient.

The statement provides an appropriate foundation for seeking clarification concerning governance, consultation, financial arrangements and the distinction between investment-based reparatory activity and direct individual compensation.

It also supports the principle that scrutiny and questions concerning the programme are legitimate components of public accountability.

Primary reference:

Church Commissioners — Response to parliamentarians, 19 January 2026.

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

5.6. February 2026: Documentary confirmation of Charmaine Simpson's Church Commissioners role

On 7 February 2026, the Diocese of Southwark held an event titled *Truth-telling in sacred spaces* at Southwark Cathedral.

The published programme identified Charmaine Simpson as a participant.

Her biography described her as Research and Engagement Coordinator for the Church Commissioners, with responsibilities concerning research into the Church of England's historical connections with African chattel enslavement.

The same publication identified her as Chief Executive Officer and co-founder of Black History Studies.

This document is important because it identifies, within a Church-related institutional publication, roles that are relevant to the later question of overlapping involvement.

The biography provides documentary support for the existence of her Church Commissioners research and engagement role during the relevant historical period.

It does not establish that she retained identical duties throughout October 2026.

It also does not establish that she exercised authority over the proposed £100 million fund.

Those matters require further clarification.

Primary reference:

Diocese of Southwark — *Truth-telling in sacred spaces*, 7 February 2026, printed page 9.

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

5.7. April 2026: Further documented participation involving Charmaine Simpson and Kwesi Ochosi

On 11 April 2026, an event titled *Routes in the Records II: Church of England's Black History at the Archives* was advertised at Lambeth Palace Library.

The published agenda identified Charmaine Simpson as delivering opening remarks at 10:15.

It identified Kwesi Ochosi as presenting at 13:30 on the relationship between Bussa's Rebellion and international law.

The event was associated with archival research, historical examination and public engagement concerning the Church of England's history and African chattel enslavement.

The significance of this record is that both individuals were publicly named in the same Church-related historical programme months before the GRH launch.

This adds chronological depth to the investigation.

It supports the proposition that their professional or public engagement activities intersected before October 2026.

It does not establish when they first became acquainted, whether they planned the event together or whether they shared formal authority.

Nor does it establish any direct financial connection between Project Spire and the GRH.

Independent verification sources:

Event listing:

https://happeningnext.com/event/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-eid1ef0kundmm9a

Eventbrite:

https://www.eventbrite.co.uk/e/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-tickets-1984960779124

5.8. April to September 2026: Unresolved development of the Global Reparations Hub

The evidence considered so far establishes that Charmaine Simpson and Kwesi Ochosi were associated with relevant Church-history engagement activities before the October GRH launch.

However, it does not establish precisely when the Global Reparations Hub was conceived, when organisational decisions were made, who authorised its formation or whether any individuals participated in preparatory discussions through other institutions.

Those questions remain open.

The investigation requires a documentary account of the GRH's formation, including any constitution, memorandum, partnership agreement, planning records, institutional sponsorship or governing arrangements.

The mere existence of earlier professional contact does not establish that the GRH was developed through Project Spire.

Equally, the possibility of such a relationship cannot be resolved through assumption alone.

The proper next step is to identify the original documents.

5.9. September 2026: Continuing Project Spire commitment

Public parliamentary material from September 2026 records the Church Commissioners' continued intention to proceed with Project Spire.

This is relevant because the programme remained an active subject of institutional attention shortly before the October events.

However, a statement of continuing intention must be distinguished from confirmation that the proposed fund had become operational.

The chronology must not confuse parliamentary statements of policy with financial transactions or completed regulatory approvals.

The exact status of all relevant authorisations and the availability of financial resources must be independently verified.

Primary reference:

UK Parliament — Oral Answers to Questions, 3 September 2026.

https://hansard.parliament.uk/commons/2026-09-03/debates/037FBAFE-1805-45CF-9E12-E133B5E2FB9C/OralAnswersToQuestions

5.10. Before 14 October 2026: The unresolved history of the launch arrangements

A central gap in the chronology concerns the period during which the Global Reparations Hub launch was planned.

The investigation has not yet established when the original Eventbrite advertisement was created, when the Black Cultural Centre was first identified as the venue, whether a formal booking existed or when the Friends House conference programme first incorporated the GRH launch.

These are not minor chronological details.

They may be essential to understanding whether the events were initially intended to be separate, whether a genuine venue change occurred, or whether another explanation applies.

The exact publication and amendment history must be established before any conclusion about intention can be reached.

The investigation should seek the original Eventbrite listing, event organiser records, venue correspondence, dated versions of the conference programme and any communications announcing changes.

5.11. 14 October 2026: Empress Judah reports discovering the Eventbrite advertisement

In her correspondence dated 18 October 2026, Empress Judah stated that she discovered the GRH launch advertisement on Tuesday 14 October.

She reported that the Eventbrite listing identified the Black Cultural Centre in Islington as the venue.

She also stated that she circulated the information to reparations organisations and individuals.

This is an important attributed account because it identifies the date on which she became aware of the advertised arrangements.

However, the date on which she discovered the listing is not necessarily the date the listing was first published.

That distinction must be preserved.

The investigation should seek the earliest available version of the advertisement and any associated notification emails.

Evidence source:

Empress Judah — Email of 18 October 2026 at 00:50.

Status: Contemporaneous correspondence preserved within the RNL investigation record.

5.12. Between 14 and 17 October 2026: Reported notification of changed arrangements

Empress Judah's correspondence states that a subsequent communication from Charmaine Simpson advised of a change in the GRH launch's time and venue.

The new arrangements placed the launch within the UK Reparations Conference at Friends House, Euston.

The date and precise wording of the original change notification require verification from the original email.

This is particularly important because a forwarded summary or recollection may not reproduce every detail of the initial communication.

The investigation should obtain the original message with its complete date, sender, recipients, subject and explanation.

That evidence may help establish who communicated the change, when it was communicated and whether the recipients were given a reason.

It may also help determine whether attendees were notified sufficiently early to adjust their plans.

The investigation cannot yet establish whether the change was deliberate misdirection, an ordinary alteration, consolidation of two events or another arrangement.

5.13. 17 October 2026: The conference programme and scheduled GRH launch

The published UK Reparations Conference agenda recorded the Global Reparations Hub launch at Friends House, beginning at 14:25.

Kwesi Ochosi was named as chair.

The programme included Charmaine Simpson among the participants.

It also named other contributors associated with reparations, education and community initiatives.

This establishes that the conference publicly scheduled the GRH launch within its programme.

The date on which that particular version of the programme was finalised or first published remains important.

The programme establishes the event's advertised place in the conference schedule.

It does not, without further records, establish when the organisers decided to include it.

Primary reference:

UK Reparations Conference 2026 — Official Agenda.

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant heading: *London Launch of the Global Reparations Hub*.

5.14. 17 October 2026: Reported exchanges during the launch

Empress Judah's first email describes exchanges during the launch concerning the formation of the GRH and the participation of longstanding Black/Afrikan reparations organisations.

She reports that a participant was unable to ask a question as the session was being concluded.

She also refers to comments made by Judy Richards of Global Afrikan Congress UK.

Her correspondence records her own question concerning why the Black reparations community had not been consulted before the launch.

She attributes a response to Charmaine Simpson.

This account is directly relevant to the investigation because it provides a contemporaneous report of questions concerning consultation and communication.

However, a complete account of the exchange would benefit from examination of any video recording, transcript, independent witness evidence and responses from the persons involved.

The investigation should avoid presenting a participant's account as a verbatim institutional record unless the underlying recording has been examined.

The purpose is to establish exactly what was said, by whom, in what context and with what opportunity for further explanation.

5.15. 18 October 2026, 00:50: First circulated statement of community concerns

At 00:50 on Sunday 18 October 2026, Empress Judah circulated her first detailed email concerning the GRH launch.

The correspondence questioned prior consultation, identified longstanding grassroots reparations organisations and described dissatisfaction with the launch arrangements.

It also discussed the original Black Cultural Centre venue and the subsequent change.

The email is significant because it records concerns shortly after the event.

It establishes that the concerns were being expressed within an identifiable network of reparations campaigners and community contacts.

It does not establish that every person copied endorsed every statement.

Nor does it establish that all organisations named had experienced identical communication difficulties.

The investigation must preserve the distinction between the concerns expressed by the author and any wider community position independently established through additional evidence.

5.16. 18 October 2026, 12:28: The suspicion becomes more specific

At 12:28, Empress Judah circulated a further email expanding upon her concerns.

She questioned how the conference could have printed programmes containing the GRH launch while the original Black Cultural Centre advertisement had also been circulated.

She asked whether confusing communications and the apparent lack of prior engagement with relevant community organisations were intentional.

This constitutes an important development in the chronology.

The concern was no longer confined to the existence of confusing arrangements.

It had developed into a question about possible intention.

The investigation must preserve that question precisely.

The suspicion that the Black Cultural Centre might have been used as a misleading or diversionary venue remains unresolved.

It must not be converted into an established finding.

Nevertheless, the question is serious enough to warrant examination of the publication, booking and communication records.

5.17. 18 October 2026, 12:28: Request to investigate Project Spire

The same email requested that John Canoe investigate the Church of England's Project Spire fund.

Empress Judah asked how and when economic reparatory justice might reach independent grassroots Black/Afrikan reparations organisations.

She also requested enquiry into the management and access arrangements of the Black Cultural Centre in Islington.

These requests formed part of the immediate circumstances leading to RNL's subsequent Project Spire research.

However, the existence of a request does not itself establish an investigative finding.

At that point, the proper initial questions concerned the identity of the relevant institution, the fund's actual status, the financial mechanism and any demonstrable connection between Project Spire and the individuals involved in the GRH launch.

The investigation therefore proceeded to examine published records.

5.18. 18 October 2026: Initial examination of Project Spire

RNL's preliminary research identified Project Spire as the Church Commissioners' reparatory programme associated with the proposed Fund for Healing, Repair and Justice.

The publicly announced £100 million commitment was distinguished from verified financial distribution.

Questions were identified concerning charitable authorisation, operational status, governance, consultation, eligibility, financial reporting and safeguards.

An investigation restart and handover document was prepared on 18 October 2026.

That document expressly required Project Spire to remain separate from the Global Reparations Hub investigation.

It also recorded that no Project Spire-specific formal enquiry had yet been confirmed as sent.

The handover established the preliminary research framework but did not itself supply the subsequently identified documentary trigger concerning overlapping involvement.

That trigger developed through further examination.

5.19. 18 October 2026: The original personnel-overlap rumour

During the continuing discussion, information was raised suggesting that Charmaine Simpson was or had been involved with Project Spire.

The precise nature of that involvement was initially uncertain.

The information was treated as an unsubstantiated investigative lead.

RNL then examined published material to determine whether the claimed relationship could be verified.

This stage must remain visible because it demonstrates that RNL did not simply accept the rumour.

The question was subjected to an evidential test.

The subsequent identification of the Diocese of Southwark programme and the official GRH conference programme provided the documentary foundation for the investigation's central trigger.

5.20. 18 October 2026: Identification of the published records

The February 2026 Diocese of Southwark programme established that Charmaine Simpson had a publicly identified research and engagement role with the Church Commissioners.

The October 2026 conference programme identified her as participating in the GRH launch.

Additional event material identified both Charmaine Simpson and Kwesi Ochosi in earlier Church-history activities.

These discoveries changed the evidential status of the original information.

The initial suggestion of overlapping involvement now had a factual basis supported by identifiable records.

Further public material concerning a Church archives programme described Kwesi Ochosi as a Project Coordinator and Archivist.

That description requires examination because it potentially provides a more substantial professional link than attendance as a guest speaker alone.

However, the precise employing institution, contractual responsibilities and relationship to Project Spire remain to be established.

The investigation must not treat a job title appearing in a public engagement account as proof of financial or governance authority over Project Spire.

5.21. 18 October 2026, 16:52: RNL requests direct GRH contact details

At 16:52, RNL sent a group email requesting assistance in identifying verified contact information for the Global Reparations Hub and relevant organisers.

The correspondence explained that a substantial independent GRH investigation had been prepared and that the absence of verified institutional contact details was creating a practical difficulty.

The email requested professional contact information, relevant communications and assistance in identifying the person authorised to receive formal enquiries.

It also acknowledged the separate requests concerning Project Spire and the Black Cultural Centre.

This was a documented step in the GRH investigation.

It must not be mistaken for formal notification of the Project Spire investigation to the Church Commissioners.

The two institutional correspondence records remain separate.

Source: RNL email dated 18 October 2026 at 16:52, preserved within the supplied GRH correspondence thread.

5.22. 18 October 2026, 17:50: Empress Judah replies

At 17:50, Empress Judah responded to RNL's request.

She expressed appreciation for the investigation but suggested reducing the existing 576-page GRH report to approximately 50 pages with no more than 12 questions.

She also requested that Charmaine Simpson and Kwesi Ochosi not be included in the continuing community correspondence and proposed a collective meeting before onward circulation of a revised report.

Her reply provided further clarification concerning the contact information available to her.

She confirmed the Black History Studies contact address already known to RNL, stated that she did not possess an email address for Kwesi Ochosi, and indicated that she had no additional verified institutional GRH contact details.

She also referred to the original communication concerning the launch venue change.

This correspondence is relevant to the wider chronology because it demonstrates the ongoing questions surrounding official communications and the need to preserve original evidence.

However, her request concerning the length of the GRH report did not change RNL's independent authority over the structure or depth of its investigations.

5.23. 18 October 2026: RNL establishes its permanent reference-library policy

Following consideration of the correspondence, RNL reaffirmed that its investigations are intended to function as comprehensive, long-term documentary reference libraries.

The purpose is to preserve evidence, historical chronology, institutional relationships, financial records, unanswered questions, corrections and subsequent developments.

RNL determined that accessibility should be improved through expanded executive summaries, source indexes and optional shorter briefings.

However, the underlying investigation should not be arbitrarily reduced merely to satisfy a reader's preferred length.

This policy applies to Project Spire and RNL's other major reparations investigations.

The Project Spire report will therefore retain its planned 24 substantive sections and six annexes, subject to additions or revisions justified by evidence.

5.24. Chronological questions still requiring answers

The present chronology identifies several material gaps.

The first concerns the precise origin and development of the Global Reparations Hub.

The date on which the organisation was conceived, formally established or authorised remains to be established.

The second concerns the original Black Cultural Centre launch advertisement.

The initial publication date, booking arrangements, communications with the Centre and reasons for any subsequent changes require documentary verification.

The third concerns the UK Reparations Conference programme.

The date on which the GRH launch was first inserted into the programme, and whether any earlier versions existed, remains important.

The fourth concerns Charmaine Simpson's professional responsibilities.

The investigation requires the exact dates, contractual capacity, reporting relationships and authority associated with her Church Commissioners role.

The fifth concerns Kwesi Ochosi.

The description of him as a Project Coordinator and Archivist requires identification of the relevant project, institution, dates, terms and responsibilities.

The sixth concerns any formal relationship between Project Spire and the GRH.

No shared governance, financing or delegated authority should be presumed without supporting documentation.

The seventh concerns financial delivery.

The investigation must establish the current status of regulatory authorisations, actual allocations, expenditure, transfers and verified receipts associated with Project Spire.

Each question should be assigned to an appropriate institution and tracked through a dated correspondence register.

5.25. Importance of the chronology for transparency and conflict prevention

The chronology is not simply a historical narrative.

It is an instrument of institutional accountability.

Where concerns arise about who knew what, when decisions were made or why information was communicated in a particular way, an accurate sequence of events provides the foundation for proper examination.

It can reveal misunderstandings, confirm legitimate explanations, identify missing documents or expose discrepancies requiring further attention.

In the context of reparatory justice, such clarity is particularly important.

Historical suffering, questions of representation and substantial proposed financial resources create circumstances in which uncertainty and perceived exclusion may have serious consequences for community confidence.

RNL's position is that transparency and competent organisation are essential safeguards for maintaining peace and preventing the escalation of disputes.

The possibility of violence or threats of violence must be considered seriously as a preventative matter, without attributing violent intentions to those raising concerns or assuming that violence will occur.

Early documentary clarification is therefore preferable to allowing unanswered questions to accumulate.

5.26. Preliminary chronological findings

The documentary record presently supports several distinct conclusions about the sequence of relevant activities.

Project Spire existed as a Church Commissioners initiative before the October 2026 GRH launch.

Charmaine Simpson had a documented Church Commissioners research and engagement role during the period covered by the February 2026 Southwark publication.

Published material concerning Church of England Black-history archives activities places Kwesi Ochosi in a Project Coordinator and Archivist role associated with the archival engagement programme, although its precise institutional basis requires confirmation.

Both Charmaine Simpson and Kwesi Ochosi appeared in the published programme for the April 2026 Lambeth Palace Library event.

Both were subsequently named in the published programme for the October 2026 Global Reparations Hub launch.

Empress Judah circulated contemporaneous correspondence immediately after that launch expressing concerns about consultation, communication and the venue arrangements.

Her correspondence also requested further examination of Project Spire.

RNL's subsequent research identified documentary support for the original suggestion of overlapping involvement.

These findings provide a substantial basis for further investigation.

They do not establish deliberate deception, an undisclosed conflict of interest, shared institutional control, improper financial activity or misconduct.

5.27. Conclusion: the chronology creates a structured foundation for further investigation

The sequence of events demonstrates how the Project Spire investigation developed from an initially uncertain suggestion into an evidence-based enquiry.

Earlier Church-related research and public engagement activities provide important historical context.

The February and April 2026 records establish identifiable professional and public involvement by relevant individuals.

The October GRH launch provides the immediate event from which contemporary community concerns emerged.

Empress Judah's correspondence documents the questions raised and the request for further investigation.

RNL's subsequent research provides the documentary foundation for examining the apparent personnel overlap.

The chronology also exposes important gaps concerning the formation of the GRH, the original Black Cultural Centre advertisement, the change of launch arrangements and the precise institutional responsibilities of relevant individuals.

These gaps should not be filled through speculation.

They should be converted into clear documentary questions directed to the responsible persons and institutions.

The chronology demonstrates that the investigation's foundation is no longer limited to rumour. It now contains identifiable institutional records, published event programmes, attributed contemporary correspondence and specific unanswered questions capable of further verification.

RNL will maintain this chronology as a living reference record, adding new evidence, corrections and institutional responses without erasing earlier material.

The objective remains the early establishment of facts, clear institutional accountability, professional organisation, public confidence and the peaceful administration of reparatory justice.

SECTION 5 — CHRONOLOGICAL EVIDENCE REGISTER

Date	Event or record	Evidential status
1 November 2025	First *Routes in the Records* event at Lambeth Palace Library, as described in later public communications	Published account
Late 2025	Public account identifies Kwesi Ochosi as Project Coordinator and Archivist	Published description; exact role requires confirmation
19 January 2026	Church Commissioners issue public response concerning the proposed fund	Official statement
7 February 2026	Southwark Cathedral event identifies Charmaine Simpson's Church Commissioners role	Institutional programme
11 April 2026	*Routes in the Records II* names Charmaine Simpson and Kwesi Ochosi	Published event agenda
3 September 2026	Parliamentary record concerning continuing Project Spire commitment	Official parliamentary record
14 October 2026	Empress Judah reports discovering the Black Cultural Centre GRH launch advertisement	Attributed account
Before 17 October 2026	Reported communication changing launch arrangements to Friends House	Original communication to be verified
17 October 2026	GRH launch included in UK Reparations Conference programme	Official published agenda
18 October, 00:50	First detailed Empress Judah email concerning the launch	Original correspondence
18 October, 12:28	Further email raises venue chronology concerns and requests Project Spire investigation	Original correspondence
18 October, later	RNL identifies published evidence of overlapping involvement	Investigation research record
18 October, 16:52	RNL requests verified GRH contacts and supporting communications	Sent correspondence

18 October, 17:50	Empress Judah replies with contact information and report-format proposals	Received correspondence
18 October, evening	RNL confirms comprehensive reference-library policy and separates investigations	Internal project decision

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SOURCES AND INDEPENDENT VERIFICATION

Source 5.1 — Church Commissioners for England

Fund for Healing, Repair and Justice — Frequently Asked Questions.

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Purpose: Background to Project Spire and the proposed financial programme.

Source 5.2 — Charmaine Simpson public communication

Routes in the Records, concerning the Church of England's Black-history archives programme.

https://www.linkedin.com/posts/blackhistorystudies_lambethpalacelibrary-churchofengland-churchcommissioners-activity-7399945016523145216-SAcQ

Purpose: Published reference to Kwesi Ochosi as Project Coordinator and Archivist, and to earlier Church archives engagement activities.

Source 5.3 — Church Commissioners statement, 19 January 2026

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Purpose: Published institutional position concerning the proposed fund and accountability.

Source 5.4 — Diocese of Southwark, February 2026

Truth-telling in sacred spaces.

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

Relevant page: Printed page 9.

Purpose: Documentary identification of Charmaine Simpson's Church Commissioners research and engagement role.

Source 5.5 — Lambeth Palace Library event, 11 April 2026

Routes in the Records II: Church of England's Black History at the Archives.

https://www.eventbrite.co.uk/e/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-tickets-1984960779124

Additional detailed programme:

https://happeningnext.com/event/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-eid1ef0kundmm9a

Purpose: Verification of named participants and scheduled presentations.

Source 5.6 — UK Parliament, 3 September 2026

https://hansard.parliament.uk/commons/2026-09-03/debates/037FBAFE-1805-45CF-9E12-E133B5E2FB9C/OralAnswersToQuestions

Purpose: Parliamentary record concerning Project Spire.

Source 5.7 — Global Reparations Hub original Eventbrite advertisement

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

Purpose: Investigation of original advertised venue, time and subsequent cancellation or alteration.

Status: Original and amended versions require preservation.

Source 5.8 — UK Reparations Conference 2026 official agenda

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Purpose: Published GRH launch arrangements and named participants.

Source 5.9 — Empress Judah correspondence

Emails dated 18 October 2026 at 00:50, 12:28 and 17:50.

Purpose: Contemporary reports of launch concerns, venue chronology, consultation questions and request for further investigation.

Status: Original correspondence preserved within the investigation record.

Source 5.10 — Reparation Nation Limited correspondence

Sunday, 18 October 2026 18/10/2026 20:53:29

Email sent 18 October 2026 at 16:52 requesting direct GRH contact details and clarification.

Purpose: Documentary record of RNL's institutional contact enquiries and separation of investigations.

Source 5.11 — Reparation Nation Limited Project Spire Restart/Handover

Document dated 18 October 2026.

Purpose: Original research handover, preliminary project scope, evidential safeguards and investigation boundaries.

END OF SECTION 5 — CHRONOLOGY OF EVENTS AND DISCOVERIES

NEXT: SECTION 6 OF 24 — CHARMAINE SIMPSON: DOCUMENTED ROLES, INSTITUTIONAL RESPONSIBILITIES, CHURCH COMMISSIONERS ENGAGEMENT AND PARTICIPATION IN THE GLOBAL REPARATIONS HUB LAUNCH.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 6 OF 24

CHARMAINE SIMPSON: DOCUMENTED ROLES, INSTITUTIONAL RESPONSIBILITIES, CHURCH COMMISSIONERS ENGAGEMENT AND PARTICIPATION IN THE GLOBAL REPARATIONS HUB LAUNCH

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Documentary evidence established concerning professional and public involvement; precise institutional responsibilities and relationships require clarification.

6.1. Purpose of this section

This section examines the documented professional and organisational activities of Charmaine Simpson insofar as they are relevant to the Church Commissioners for England's Project Spire and the Global Reparations Hub (GRH) launch of 17 October 2026.

It addresses the specific rumour that initially prompted further enquiries: that a person associated with the GRH launch was also involved in Project Spire.

The investigation has identified published records substantiating the underlying personnel overlap.

This section examines those records more closely, distinguishes Charmaine Simpson's different professional capacities, identifies questions about responsibility and institutional authority, and explains why clarification from the relevant organisations is appropriate.

The purpose is not to construct a personal allegation against Charmaine Simpson.

It is to establish what work she performed, for whom, under what authority, during which periods, and whether her participation in separate reparations initiatives creates any institutional relationships requiring disclosure or explanation.

The investigation will preserve a clear distinction between a person's documented involvement, their formal responsibilities, their actual decision-making authority and their personal or organisational opinions.

6.2. Why Charmaine Simpson became relevant to the investigation

Charmaine Simpson became relevant to the Project Spire investigation because of two initially separate areas of activity.

The first concerns her publicly documented work with the Church Commissioners in research and engagement relating to the Church of England's historical connections to African chattel enslavement.

The second concerns her publicly documented involvement in the Global Reparations Hub launch at the UK Reparations Conference on 17 October 2026.

Following that launch, Empress Judah circulated correspondence expressing dissatisfaction with aspects of the event, including concerns about advance consultation, communication and the handling of questions from longstanding grassroots reparations campaigners.

Empress Judah also raised questions about the original advertised launch at the Black Cultural Centre in Islington and the subsequent arrangements at Friends House, Euston.

During subsequent enquiries, information arose suggesting that Charmaine Simpson was associated with Project Spire.

That information was initially treated as unverified.

Research then identified published records establishing her Church Commissioners engagement work and her separate involvement in the GRH launch.

The existence of that documented overlap provides a legitimate reason to establish the precise boundaries of the relevant responsibilities.

It does not establish that Charmaine Simpson acted improperly.

6.3. Documented role with the Church Commissioners

The Diocese of Southwark's publication for *Truth-telling in sacred spaces*, held at Southwark Cathedral on 7 February 2026, provides particularly important primary evidence.

The programme identifies Charmaine Simpson as an Engagement Coordinator associated with the Church Commissioners and as Chief Executive Officer of Black History Studies.

Her published biography gives the more specific title **Research and Engagement Coordinator for the Church Commissioners**.

It describes her responsibility for coordinating research into the Church of England's connections with African chattel enslavement.

This is direct documentary evidence of a professional role with the Church Commissioners during the relevant period.

It is not merely a rumour circulating within the reparations community.

The evidence is important because the Church Commissioners are the institution responsible for Project Spire, whose reparatory programme was developed in response to research concerning historical links to African chattel enslavement.

However, the precise relationship between this research and engagement position and each component of Project Spire's formal governance requires further clarification.

The biography does not supply an employment contract, appointment letter, formal delegation schedule or complete description of decision-making authority.

It must therefore be treated as evidence of the described role, not proof of powers that the publication does not identify.

Primary verification source:

Diocese of Southwark, *Truth-telling in sacred spaces*, 7 February 2026, printed page 9:

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

6.4. Additional public identification of Project Spire responsibilities

A public event listing for a University of Brighton event scheduled for 21 October 2026 provides a further description of Charmaine Simpson's professional work.

The published biography identifies her as working with the Church Commissioners on Project Spire in a Research Engagement Coordinator capacity.

It describes her involvement in supporting and overseeing research exploring the Church of England's historical connections to transatlantic African chattel enslavement.

This provides additional support for the relationship between the publicly identified Church Commissioners role and Project Spire.

Because the event is scheduled after the date of this report, the listing should be treated as a publicly available biographical description, not as evidence that the event has already occurred.

The wording should also be distinguished from formal confirmation by the Church Commissioners themselves.

A published event biography can substantiate how a person's role is publicly represented, while leaving the exact contractual and organisational arrangements to be confirmed by the employing or commissioning institution.

Verification source:

Brighton and Hove City's Historical Links to the Transatlantic Slave Trade — Event biography:

https://philevents.org/event/show/153245

6.5. Chief Executive Officer of Black History Studies

The February 2026 Southwark publication also identifies Charmaine Simpson as CEO and co-founder of Black History Studies.

This is a separate organisational capacity from her Church Commissioners research and engagement role.

Black History Studies is associated with educational activities concerning African and Caribbean history, historical knowledge and public engagement.

A biographical article published by Black History Month UK in September 2026 describes Charmaine Simpson's work establishing Black History Studies with Mark Simpson in 2007.

That background is relevant to understanding why she may participate in historical research, public events and reparations discussions.

It does not establish that Black History Studies and the Church Commissioners share management, ownership, funding or authority.

The investigation must therefore distinguish activities undertaken as CEO of Black History Studies from any activities formally undertaken on behalf of the Church Commissioners.

The distinction becomes important when examining the Global Reparations Hub launch, because Charmaine Simpson was publicly identified in her Black History Studies capacity.

Supporting source:

Black History Month UK, *Charmaine Simpson: Filling the Missing Pages of History*, 30 September 2026:

https://www.blackhistorymonth.org.uk/article/section/honouring-black-britain-2026/charmaine-simpson-filling-the-missing-pages-of-history/

6.6. Involvement in Church-related public history events

The documentary record demonstrates that Charmaine Simpson was involved in public educational and engagement activities concerning Church of England history before the GRH launch.

The February 2026 Southwark Cathedral programme identifies her as a participant in a panel concerning historical responsibility and reflection.

Other public material concerns the *Routes in the Records* programme at Lambeth Palace Library, examining Church of England Black history and archival records.

These activities fall within the wider subject matter of historical enslavement, institutional records, memory and public understanding.

They may be directly relevant to her documented research and engagement responsibilities.

However, their individual funding sources, commissioning arrangements and relationship to the formal Project Spire programme require separate verification.

It would be inappropriate to assume that every event concerning Church of England Black history was funded from the proposed reparatory fund.

Likewise, the existence of a public engagement event does not establish that participants were consulted on investment policy, future grants or beneficiary selection.

6.7. The April 2026 Lambeth Palace Library programme

The published programme for *Routes in the Records II: Church of England's Black History at the Archives*, advertised for 11 April 2026, names Charmaine Simpson as providing opening remarks.

It also names Kwesi Ochosi as a presenter.

This is an important chronological connection because Kwesi Ochosi was later identified as chair of the October GRH launch.

The April programme supports the finding that both individuals were publicly associated with the same Church-history event before the GRH launch.

It does not establish that they jointly organised the programme, held the same institutional responsibilities or developed the GRH through the Church Commissioners.

The publication should therefore be used as evidence of named participation, not as an organisational or financial agreement.

Verification links:

https://happeningnext.com/event/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-eid1ef0kundmm9a

https://www.ianvisits.co.uk/calendar/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-429053/

6.8. Public reference to Kwesi Ochosi as Project Coordinator and Archivist

A public LinkedIn communication by Charmaine Simpson concerning a Church archives engagement programme describes Kwesi Ochosi as a **Project Coordinator and Archivist**.

It refers to a presentation examining Bishop Samuel Crowther and the historical difficulties associated with his life and work.

This description warrants particular attention.

It is more specific than identifying Kwesi Ochosi simply as a guest speaker.

However, the expression does not identify, on its own, the complete employment or contractual structure of the relevant project.

It does not establish whether he was employed by the Church Commissioners, engaged by another organisation, working under a separate archival initiative or carrying out responsibilities formally assigned within Project Spire.

Nor does it establish that he exercised authority over Project Spire's proposed reparatory fund.

The title therefore creates an important documentary enquiry rather than a completed finding about institutional control.

The relevant organisation should be asked to identify the project, the commissioning arrangements, the period of appointment, the reporting structure and the boundaries of responsibility.

Source:

Charmaine Simpson, public LinkedIn communication concerning *Routes in the Records*:

https://www.linkedin.com/posts/blackhistorystudies_lambethpalacelibrary-churchofengland-churchcommissioners-activity-7399945016523145216-SAcQ

6.9. Participation in the Global Reparations Hub launch

The official UK Reparations Conference programme for 17 October 2026 identifies Charmaine Simpson as a participant in the London launch of the Global Reparations Hub.

The programme lists her as CEO of Black History Studies.

Kwesi Ochosi is identified as chair.

This is a separate documentary record from the Church Commissioners material.

Its significance is that Charmaine Simpson's involvement in the GRH launch is not dependent exclusively upon Empress Judah's account.

The published programme independently supports her identified participation.

However, a named speaking role does not automatically establish legal authority over an organisation.

It does not prove that the speaker established the organisation, approved its constitution, selected all other participants, controlled its finances or determined its consultation arrangements.

Those responsibilities must be established through appropriate organisational documents and responses.

Primary source:

UK Reparations Conference 2026 — Official Agenda:

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant heading: *London Launch of the Global Reparations Hub*, 17 October 2026.

6.10. The original Black Cultural Centre Eventbrite listing

The original advertised London launch at the Black Cultural Centre in Islington introduces an additional question about organisational responsibility.

The Eventbrite listing identified Black History Studies in the event-organiser information.

Because Charmaine Simpson is publicly identified as CEO of Black History Studies, the listing provides a reason to ask about the organisation's role in arranging or publicising the event.

However, an organisation being identified as an event organiser does not independently establish which individual created the listing, approved the venue, entered into booking arrangements or made later changes.

The investigation must distinguish between an organisation's public listing and the personal decisions of its officers or staff.

The proper documentary questions concern the Eventbrite account responsible for publication, the original venue arrangement, the decision-making record, the notification process and the circumstances of any cancellation or relocation.

These matters primarily belong to the GRH and Black Cultural Centre investigations.

They become relevant to Project Spire insofar as they assist in identifying the capacity in which a person associated with Church Commissioners work was involved.

Original event listing:

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

The complete event publication and amendment history remains to be obtained.

6.11. Empress Judah's report of the launch discussion

In her email dated 18 October 2026 at 00:50, Empress Judah described concerns about consultation with longstanding Black/Afrikan grassroots reparations organisations.

She reported asking why the Black reparations community had not been consulted before the GRH launch.

She attributed to Charmaine Simpson the response:

"you are being informed now"

That wording is important because it forms part of Empress Judah's contemporaneous account of what she experienced as inadequate consultation.

The investigation must preserve the words as reported and should seek to verify the exchange through any available recording, independent witness account or clarification from the speaker.

The reported statement should not automatically be treated as a complete account of the discussion.

The surrounding questions, time available, other contributions and any previous consultation should also be examined.

The investigative issue is whether the formation of the GRH involved meaningful prior consultation and what responsibility Charmaine Simpson personally held for that process.

6.12. Distinguishing communication from consultation

The reported exchange raises an important distinction.

Informing people that an institution has been launched is not necessarily equivalent to consulting them about its formation.

Consultation may involve seeking views before decisions are finalised, recording contributions, responding to objections and explaining how those views influence subsequent arrangements.

Communication may consist simply of providing information about decisions already made.

Neither activity should be misrepresented as the other.

However, the absence of consultation with particular organisations cannot be established merely from one reported exchange.

The investigation requires records identifying which organisations were approached, when communications occurred, what questions were asked, what responses were received and how the information was considered.

It must also establish the responsibilities of the persons involved.

These questions are relevant to the GRH investigation and may provide context for examining the consultation standards adopted by Project Spire.

The two consultation processes must nevertheless remain distinct.

6.13. Empress Judah's concerns about earlier Church-related events

Empress Judah's correspondence also refers to earlier Church-related reparations events.

She states that longstanding Black reparations campaigners had not been adequately informed of a three-day conference in Liverpool in June 2024 or the February 2026 Southwark Cathedral event.

She associates these concerns with Charmaine Simpson's Church Commissioners engagement responsibilities.

These statements are important as attributed concerns.

However, they do not independently establish the official communication arrangements for those events, the scope of Charmaine Simpson's responsibilities at the relevant dates, or which individuals or organisations received invitations.

The June 2024 event predates the February 2026 programme identifying her position.

It would therefore be inappropriate to presume responsibility for communications in June 2024 without establishing whether she held the relevant role at that time.

The investigation should request the appointment dates and actual responsibilities before drawing any connection between those earlier events and an individual officer's duties.

The same method should apply to the February 2026 event.

6.14. The importance of precise appointment dates

The present records do not establish the complete start and end dates of Charmaine Simpson's Church Commissioners appointment.

The February 2026 publication identifies a role during that period.

The October 2026 public biography provides a further description of her Project Spire work.

However, these documents should not be treated as substitutes for an authoritative appointment history.

The precise dates matter because the investigation is examining communications and events occurring at different times.

An individual should not be assigned responsibility for decisions made before commencing a relevant role or after leaving it.

Nor should a person's current title be used automatically to describe all earlier activities.

The Church Commissioners should therefore be asked to confirm when the role commenced, whether it remains active, whether its title or responsibilities changed and which programmes were included within its scope.

This information can clarify the chronology without requiring disclosure of unnecessary private employment details.

6.15. Employment, consultancy and organisational authority

The expression *working with the Church Commissioners* may cover several kinds of professional arrangement.

An individual may be directly employed, engaged under a consultancy agreement, appointed through another organisation or assigned particular responsibilities under a fixed-term project.

The published evidence establishes that a Church Commissioners research and engagement role was publicly described.

It does not fully identify the underlying contractual mechanism.

That mechanism may matter where the investigation seeks to establish reporting lines, institutional responsibility, external activities and applicable conflict-of-interest procedures.

The objective is not to obtain unnecessary personal employment information.

It is to determine which institution authorised the role, who supervised the relevant work, what responsibilities were delegated and what public accountability procedures apply.

A suitably redacted role description, organisational chart or formal institutional confirmation may be sufficient.

6.16. Research and engagement responsibilities versus financial authority

One of the most important distinctions in this investigation concerns the difference between research and engagement responsibilities and financial decision-making authority.

Project Spire is associated with a proposed £100 million commitment.

That commitment involves institutional questions concerning charitable authorisation, financial governance, investment decisions, grant-making and eventual delivery.

A Research and Engagement Coordinator may have responsibilities concerning historical evidence, consultation, public engagement or coordination.

Such a title does not automatically confer authority to allocate or distribute financial resources.

The investigation has not established that Charmaine Simpson had authority over Project Spire's proposed financial distributions.

It must therefore avoid language suggesting that she controlled the £100 million fund.

Instead, the Church Commissioners should be asked to identify which officers or bodies hold financial authority and whether research and engagement personnel have any formal influence over beneficiary criteria or selection.

That question is legitimate because transparency requires clarity about the relationship between consultation and decision-making.

6.17. Potential institutional overlap and conflicts of interest

The documented involvement of Charmaine Simpson in Church Commissioners work and in the GRH launch raises questions concerning overlapping professional and organisational responsibilities.

It does not establish a conflict of interest.

An individual may legitimately participate in several reparations initiatives.

However, potential conflicts may arise where responsibilities overlap in ways that affect impartiality, institutional confidentiality, procurement, consultation, beneficiary selection or financial decisions.

The appropriate response is to examine the existence and operation of relevant policies.

The Church Commissioners should be asked whether staff, contractors and programme representatives are required to declare relevant external roles.

It should also clarify how any actual or potential conflicts are assessed and managed.

The investigation should distinguish between conflicts that have been identified, risks for which policies exist and hypothetical concerns not linked to any demonstrated decision.

No adverse finding should be made without the necessary evidence.

6.18. The distinction between Project Spire and the Global Reparations Hub

Project Spire is a Church Commissioners programme.

The Global Reparations Hub is a separately identified initiative whose governance, legal identity and organisational relationships are under investigation by RNL.

The presence of Charmaine Simpson in both areas does not make them the same project.

Nor does it establish that the Church Commissioners were responsible for the GRH's launch arrangements.

The investigation must identify any actual contractual, advisory, funding, staffing or institutional relationships between them.

Where no such relationship exists, that should be recorded.

Where a relationship exists, its nature and limitations should be explained.

The distinction protects both public understanding and investigative fairness.

It prevents speculation about one institution from being transferred automatically to another.

6.19. The significance of professional visibility and public confidence

Charmaine Simpson's documented activities place her in publicly visible roles concerning Black history, Church-related historical research and reparations discussions.

Public visibility may naturally lead community members to ask about the relationships between organisations and programmes in which a person participates.

These questions are not inherently accusations.

They may arise because institutions do not clearly explain the different capacities in which individuals act.

Where significant reparatory funding commitments are involved, uncertainty about roles and authority may become more consequential.

The appropriate response is accessible institutional information.

Clear public explanations can identify which responsibilities are personal, organisational, contractual or formally delegated.

Such clarity helps prevent misunderstanding and unnecessary personalisation of institutional questions.

6.20. Safeguards against anti-Black racism and Institutional Racism

RNL seeks to establish what safeguards operate within Project Spire's research, engagement, consultation and governance arrangements.

In particular, the investigation asks whether the Church Commissioners recognise the possibility that anti-Black racism, racial bias or Institutional Racism could affect decision-making where effective protections are absent or inadequate.

This question concerns institutional systems.

It is not an accusation against Charmaine Simpson.

Relevant safeguards may include transparent consultation criteria, independently accessible complaints processes, equality policies, review arrangements, conflicts-of-interest procedures and protections against retaliation for raising concerns.

The investigation will seek documentary evidence that such safeguards exist and information about how they operate in practice.

It must distinguish between published commitments and verified operational arrangements.

6.21. Transparency, professional organisation and peaceful conflict prevention

Reparatory justice involves historical suffering, substantial public expectations and potentially significant financial interests.

RNL considers transparency and high-quality organisation to be essential safeguards for maintaining peace and preventing violence and threats of violence.

Questions concerning consultation and organisational authority should therefore be addressed early and clearly.

Unanswered concerns about who made decisions, who had authority and who was consulted may contribute to mistrust.

The investigation seeks to reduce that uncertainty through documentary evidence and fair institutional enquiry.

The reference to violence and threats of violence is made solely as a preventative concern.

There is no finding that Charmaine Simpson, Kwesi Ochosi or any other named participant has threatened violence.

Nor does the investigation suggest that people expressing dissatisfaction are violent.

Its approach remains lawful, peaceful, respectful and evidence-based.

6.22. The importance of Charmaine Simpson's right of reply

Charmaine Simpson must have a fair opportunity to clarify her professional responsibilities and participation in the activities discussed.

An event programme may not fully explain an individual's position.

A biographical description may omit important limitations or changes in responsibility.

A correspondent's account of a public exchange may not include the entire discussion.

The investigation must therefore allow the relevant person and institutions to provide accurate contextual information.

Questions should be directed through appropriate professional communication channels.

Any substantive response should be preserved, assessed against the evidence and incorporated into the investigation record.

Corrections should be made where justified.

The existence of a right of reply must not be confused with a presumption that the original questions were improper.

It is a necessary part of a professional investigation.

6.23. Specific questions requiring written clarification

The documentary evidence supports a focused set of questions for the Church Commissioners and, where appropriate, Charmaine Simpson or Black History Studies.

Question 1: What was Charmaine Simpson's exact position with the Church Commissioners, and when did it commence?

Question 2: Was the position held through direct employment, consultancy or another formal arrangement?

Question 3: What responsibilities did the position involve concerning Project Spire, historical research, public engagement and consultation?

Question 4: Which senior officer or department supervised the role?

Question 5: Did the responsibilities include any authority over financial recommendations, beneficiary selection, grants, investment decisions or allocations?

Question 6: Was the Church Commissioners institutionally involved in the GRH launch on 17 October 2026?

Question 7: Was Charmaine Simpson's GRH participation undertaken in her Black History Studies capacity, Church Commissioners capacity, another capacity or a combination of roles?

Question 8: Were any applicable policies concerning external appointments and declarations of interest engaged?

Question 9: Did the Church Commissioners have any formal relationship with Kwesi Ochosi or his work as a Project Coordinator and Archivist?

Question 10: What relationship, if any, exists between the Church-related archival programmes and Project Spire's formal research and engagement activities?

Question 11: What arrangements enable longstanding grassroots Black/Afrikan reparations organisations to raise consultation concerns with Project Spire?

Question 12: What written safeguards, review mechanisms and independent complaints procedures apply to those activities?

These are initial questions arising from the documentary record. They do not exhaust the questions that may become necessary as further evidence emerges.

6.24. Preliminary evidential findings

The investigation has established that Charmaine Simpson was publicly identified as a Research and Engagement Coordinator for the Church Commissioners in material published for a February 2026 Diocese of Southwark event.

A separate public event biography expressly associates her Church Commissioners work with Project Spire.

She is also publicly identified as CEO and co-founder of Black History Studies.

The official UK Reparations Conference programme identifies her as a participant in the GRH launch on 17 October 2026.

Published materials concerning Church of England Black-history archive events identify her participation alongside Kwesi Ochosi.

These records substantiate the original suggestion of overlapping involvement.

They do not establish the complete institutional, contractual or financial relationships between the projects.

They do not establish responsibility for every aspect of the GRH launch, deliberate exclusion, misuse of the Black Cultural Centre, improper influence or financial wrongdoing.

Those matters require further evidence and appropriate institutional responses.

6.25. Conclusion: documented involvement creates legitimate questions, not predetermined findings

The investigation into Charmaine Simpson's activities demonstrates the difference between an unsupported rumour and a documentary finding.

The original suggestion of overlapping involvement was capable of verification.

Published Church-related material established a research and engagement role with the Church Commissioners.

A separate public biography linked that work explicitly to Project Spire.

The official GRH conference programme established involvement in the October launch.

Further event material documented earlier participation involving Charmaine Simpson and Kwesi Ochosi in Church-history activities.

These discoveries provide substantial grounds for further examination of institutional boundaries, authority, consultation and governance safeguards.

They do not justify automatically attributing the conduct of one organisation to another.

RNL must therefore continue to distinguish professional association from legal authority, participation from representation, consultation from consent and financial commitments from actual delivery.

The Church Commissioners and other relevant parties should be invited to clarify the remaining questions through written documentary responses.

The central finding of this section is that Charmaine Simpson's involvement in Project Spire-related Church Commissioners work and her separate involvement in

the Global Reparations Hub launch are supported by publicly identifiable documentary evidence. The precise institutional significance of that overlap remains the subject of investigation.

The purpose of further enquiries is to establish the facts, strengthen transparency, protect community confidence and contribute to professional, peaceful and accountable reparatory justice.

SECTION 6 — EVIDENCE REGISTER

Evidence ID	Documented matter	Status
SPIRE-6-001	February 2026 Southwark programme identifies Charmaine Simpson's Church Commissioners research and engagement role	Primary institutional evidence
SPIRE-6-002	Public event biography expressly describes her Project Spire involvement	Published biographical evidence
SPIRE-6-003	Charmaine Simpson identified as CEO and co-founder of Black History Studies	Published biographical evidence
SPIRE-6-004	October 2026 GRH conference programme names her as a participant	Official programme evidence
SPIRE-6-005	April 2026 archives programme identifies participation involving Charmaine Simpson and Kwesi Ochosi	Published programme evidence
SPIRE-6-006	Public account identifies Kwesi Ochosi as Project Coordinator and Archivist	Published description; institutional basis unresolved
SPIRE-6-007	Eventbrite identifies Black History Studies in GRH launch organisation information	Event listing; original records and responsibilities to be verified
SPIRE-6-008	Empress Judah reports a consultation exchange involving Charmaine Simpson	Attributed contemporary witness account

SPIRE-6-009	Charmaine Simpson's precise contractual and financial authority	Not established
SPIRE-6-010	Any formal relationship between Project Spire and GRH	Not established

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SOURCES AND INDEPENDENT VERIFICATION

Source 6.1 — Diocese of Southwark, 7 February 2026

Truth-telling in sacred spaces, printed page 9.

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

Evidence: Charmaine Simpson's Church Commissioners Research and Engagement Coordinator role and Black History Studies responsibilities.

Source 6.2 — Public event biography, October 2026

Brighton and Hove City's Historical Links to the Transatlantic Slave Trade.

https://philevents.org/event/show/153245

Evidence: Published description expressly identifying Charmaine Simpson as working on Project Spire.

Source 6.3 — Black History Month UK, 30 September 2026

Charmaine Simpson: Filling the Missing Pages of History.

https://www.blackhistorymonth.org.uk/article/section/honouring-black-britain-2026/charmaine-simpson-filling-the-missing-pages-of-history/

Evidence: Background concerning Black History Studies and Charmaine Simpson's professional activities.

Source 6.4 — UK Reparations Conference 2026

Official agenda, 17 October 2026.

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Evidence: Charmaine Simpson's named participation in the GRH launch and Kwesi Ochosi's role as chair.

Source 6.5 — Lambeth Palace Library archives programme

Routes in the Records II, 11 April 2026.

https://happeningnext.com/event/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-eid1ef0kundmm9a

Evidence: Published programme naming Charmaine Simpson and Kwesi Ochosi.

Source 6.6 — Charmaine Simpson public communication

https://www.linkedin.com/posts/blackhistorystudies_lambethpalacelibrary-churchofengland-churchcommissioners-activity-7399945016523145216-SAcQ

Evidence: Published description of Kwesi Ochosi as Project Coordinator and Archivist in the Church archives engagement context.

Source 6.7 — Eventbrite, 17 October 2026

London Launch of the Global Reparations Hub.

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

Evidence: Original advertised Black Cultural Centre launch information and Black History Studies organiser listing. Publication and amendment history require preservation.

Source 6.8 — Empress Judah correspondence

Emails of 18 October 2026 at 00:50, 12:28 and 17:50.

Evidence: Contemporary reports concerning GRH consultation, venue arrangements and the request for further investigation.

Status: Original correspondence in the RNL documentary record; not a publicly accessible verification link.

END OF SECTION 6 — CHARMAINE SIMPSON: DOCUMENTED ROLES, INSTITUTIONAL RESPONSIBILITIES, CHURCH COMMISSIONERS ENGAGEMENT AND PARTICIPATION IN THE GLOBAL REPARATIONS HUB LAUNCH

NEXT: SECTION 7 OF 24 — KWESI OCHOSI: DOCUMENTED ROLES, CHURCH-RELATED ARCHIVAL ACTIVITIES, GLOBAL REPARATIONS HUB RESPONSIBILITIES AND QUESTIONS OF INSTITUTIONAL AUTHORITY.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 7 OF 24

KWESI OCHOSI: DOCUMENTED ROLES, CHURCH-RELATED ARCHIVAL ACTIVITIES, GLOBAL REPARATIONS HUB RESPONSIBILITIES AND QUESTIONS OF INSTITUTIONAL AUTHORITY

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Substantial documentary evidence of overlapping professional and organisational involvement; precise institutional authority, contractual arrangements and financial responsibilities remain under investigation.

7.1. Purpose of this section

This section investigates the documented professional, organisational and public activities of Kwesi Ochosi insofar as they relate to Church of England historical research, Project Spire and the Global Reparations Hub (GRH).

The preceding sections established a documentary basis for Charmaine Simpson's involvement in Church Commissioners research and engagement activities and her separate participation in the GRH launch on 17 October 2026.

The investigation now identifies a further, potentially important connection involving Kwesi Ochosi.

Published information identifies him as a Project Coordinator and Archivist associated with Church of England Black-history research activities. A separate first-hand account by a researcher who worked at Lambeth Palace Library expressly connects the archival project, and work undertaken alongside Kwesi Ochosi, with Project Spire.

Other published records identify him as the founder of Building Trust Consortium and as chair or moderator of GRH-related events.

These findings are important because they strengthen the original investigative concern that individuals associated with the GRH launch also had involvement in activities connected with Project Spire.

However, the investigation must determine the nature and boundaries of that involvement before making findings about institutional relationships, authority or accountability.

Its purpose is to establish documentary facts, identify questions requiring explanation and distinguish professional involvement from institutional control.

7.2. How Kwesi Ochosi became relevant to the investigation

Kwesi Ochosi first entered RNL's investigation through correspondence and published material concerning the Global Reparations Hub launch.

Empress Judah's emails dated 18 October 2026 referred to his apparent role in facilitating the launch and raised questions about the organisation's formation, community consultation and communication arrangements.

The official conference programme independently identified Kwesi Ochosi as chair of the launch session.

This was sufficient to make his organisational responsibilities a legitimate subject of the separate GRH investigation.

During examination of possible connections with Project Spire, further published records identified him participating in Church-related archival research events.

A subsequent source described his work in the context of Project Spire itself.

The significance of that discovery is that the investigation no longer depends solely upon an assumed association arising from the GRH launch.

There is documentary evidence supporting examination of his Church-related research activities.

The precise responsibilities attached to that work must nevertheless be established through appropriate institutional records.

7.3. Identification as founder of Building Trust Consortium

The official UK Reparations Conference programme identifies Kwesi Ochosi as founder of Building Trust Consortium.

This establishes a publicly stated organisational association relevant to his participation in the GRH launch.

The precise legal identity, incorporation status, governance structure, finances and contractual responsibilities of Building Trust Consortium require separate verification.

An organisational name appearing in a conference programme does not automatically establish that the organisation is an incorporated company, registered charity or independent legal entity.

The investigation must therefore establish the institutional status of Building Trust Consortium before attributing legal responsibilities to it.

This includes determining whether the consortium operates through a registered organisation, an informal partnership, a programme hosted by another institution or a different arrangement.

The distinction matters because accountability for contracts, finances, event organisation and formal communications depends upon the actual legal and organisational structure.

Primary reference:

UK Reparations Conference 2026 — Official Agenda:

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant heading: *London Launch of the Global Reparations Hub*.

7.4. The November 2025 Church archives programme

A public communication by Charmaine Simpson concerning *Routes in the Records: Church of England's Black History at the Archives* identifies an earlier event at Lambeth Palace Library on 1 November 2025.

The communication also describes a subsequent online presentation of the programme.

In that account, Kwesi Ochosi is identified as a **Project Coordinator and Archivist**.

His presentation concerned Bishop Samuel Crowther and the historical complexities surrounding Crowther's life and work.

This is an important source because it describes Kwesi Ochosi in a professional project capacity rather than simply as an audience member or invited commentator.

Nevertheless, the exact employing or commissioning body is not identified sufficiently by that description alone.

The existence of a role title does not establish the individual who approved the appointment, the source of payment, contractual obligations or financial decision-making powers.

The investigation therefore records the title as a published description requiring confirmation from the responsible institution.

Public source:

Charmaine Simpson — *Routes in the Records* communication:

https://www.linkedin.com/posts/blackhistorystudies_lambethpalacelibrary-churchofengland-churchcommissioners-activity-7399945016523145216-SAcQ

7.5. A further documentary breakthrough: direct reference to Project Spire

An independently published first-hand account titled *A Glimpse into the Archive: My Placement at Lambeth Palace Library* provides a more direct connection.

The author describes undertaking a research placement at Lambeth Palace Library and working alongside Dr Annabelle Gilmore and Kwesi Ochosi.

The account explains that two full-time archivist and project coordinator positions were created at the library to support archival research associated with the Church's historical connections to enslavement.

The author expressly describes that archival work as part of Project Spire.

This is a significant evidential development.

Unlike a general event listing, the account describes actual work undertaken alongside named researchers and places that work within the context of Project Spire.

It therefore strengthens the basis for investigating Kwesi Ochosi's involvement in Project Spire-related research.

However, the account is a participant's description rather than an official employment confirmation issued by the Church Commissioners.

The responsible institution should therefore be asked to verify the exact roles, commissioning arrangements, reporting lines and relationship to Project Spire.

Documentary source:

A Glimpse into the Archive: My Placement at Lambeth Palace Library.

https://www.memslib.co.uk/post/a-glimpse-into-the-archive-my-placement-at-lambeth-palace-library

Evidential significance: A first-hand account expressly connecting archival research undertaken alongside Kwesi Ochosi with Project Spire.

7.6. What the new archival evidence establishes

The evidence now supports a more substantial finding than could initially be made.

Kwesi Ochosi was publicly described as a Project Coordinator and Archivist in connection with Church of England Black-history archival engagement work.

A separate first-hand account identifies him as working alongside another researcher at Lambeth Palace Library on work described as part of Project Spire.

These sources provide grounds for treating his professional archival involvement as a documented connection relevant to the Project Spire investigation.

This is stronger than merely observing that he attended the same conference as Charmaine Simpson.

Nevertheless, the evidence does not establish that Kwesi Ochosi was a trustee of the proposed fund.

It does not establish that he exercised authority over investment decisions, grants, beneficiary selection or financial disbursements.

It does not establish that the Church Commissioners directed his separate GRH activities.

Those matters require further evidence.

The distinction between documented professional involvement and unverified institutional authority is essential.

7.7. The importance of archival research within Project Spire

Project Spire responds to historical research into connections between Church Commissioners predecessor bodies and African chattel enslavement.

Archival research may assist in identifying institutional records, historical relationships, financial connections, individuals and the experiences of people affected by enslavement.

Such research can be important to institutional truth-telling and public understanding.

However, historical research and the administration of reparatory funds are not identical responsibilities.

A professional archivist may have authority over particular research activities without having authority over the legal or financial decisions that follow.

The investigation must therefore establish which Project Spire activities were conducted through Lambeth Palace Library and how they related to the wider programme.

It should also identify whether the archival research contributed to consultation, policy development, institutional recommendations or subsequent publications.

The questions concern the documentary movement of information and authority, not assumptions about improper influence.

7.8. The April 2026 Lambeth Palace Library event

The published programme for *Routes in the Records II: Church of England's Black History at the Archives* identifies Kwesi Ochosi as a speaker at Lambeth Palace Library on 11 April 2026.

His scheduled presentation concerned the relationship between Bussa's Rebellion and international law.

Charmaine Simpson was identified as providing opening remarks in her Research and Engagement Coordinator capacity.

This establishes further public involvement in a Church-related historical research programme.

Considered alongside the November 2025 programme and the placement account, the April event provides evidence of continuity in the relevant field of activity.

It supports further investigation into the research programme's structure, commissioning arrangements and relationship to Project Spire.

It does not establish that the participants exercised identical institutional responsibilities or that they later acted together on behalf of the Church Commissioners.

Source:

Routes in the Records II: Church of England's Black History at the Archives, 11 April 2026:

https://happeningnext.com/event/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-eid1ef0kundmm9a

7.9. Documentary chronology of Kwesi Ochosi's involvement

The currently identified records establish a sequence of public and professional activities.

In November 2025, Kwesi Ochosi was associated with a Church-history archival engagement programme and subsequently described in a Project Coordinator and Archivist capacity.

In April 2026, he was listed as a speaker in a further Lambeth Palace Library event involving Charmaine Simpson.

In October 2026, he was identified in GRH-related event materials as a moderator and subsequently as chair of the London GRH launch.

A first-hand account of work undertaken at Lambeth Palace Library connects the archival programme with Project Spire.

The dates on which his formal research appointment commenced and concluded remain to be verified.

The chronology must also distinguish the date a research activity occurred from the date a public account describing that activity was published.

This is important because retrospectively published accounts may identify earlier work without confirming that the same contractual arrangements continued into October 2026.

7.10. Kwesi Ochosi and the Building Reparative Futures programme

An Eventbrite advertisement for *Columbus Day to Reparations Day: Civil Society Led Reparatory Justice*, held online on 12 October 2026, identifies the event as part of the Building Reparative Futures London programme.

The advertisement associates the event with the Global Reparations Hub, Building Trust Consortium and Black History Studies.

It identifies Kwesi Ochosi as moderator.

This is important because it demonstrates that his public involvement with the GRH was not confined to the conference launch on 17 October.

The programme included an earlier advertised activity during the same week.

The listing provides documentary evidence of cooperation in event presentation among the named organisations.

However, an event listing identifying several hosts does not establish the terms of any financial or legal partnership.

It also does not establish that the Church Commissioners sponsored or directed the activity.

Public verification source:

Columbus Day to Reparations Day: Civil Society Led Reparatory Justice, 12 October 2026:

https://www.eventbrite.co.uk/e/columbus-day-to-reparations-day-civil-society-led-reparatory-justice-tickets-2002760501573

7.11. The GRH's wider international context

The Global Reparations Hub has been associated publicly with an international initiative involving civil society organisations.

A Human Rights Watch public announcement concerning a Berlin launch identifies Kwesi Ochosi as a participant representing Building Trust Consortium in the United Kingdom.

This record is relevant because it places his GRH-related participation within an international context preceding the October 2026 London event.

It suggests that the London activities should not be examined solely as an isolated local launch.

However, the exact legal identity, governing arrangements and relationship between the international initiative and the London activities require separate documentary investigation.

The participation of Human Rights Watch in the wider GRH initiative does not establish that Human Rights Watch controlled the London event or that it had any direct relationship with Project Spire.

Those institutional boundaries must be established through primary records.

Source:

Human Rights Watch — Public announcement concerning the Global Reparations Hub launch in Berlin:

https://www.linkedin.com/posts/human-rights-watch_human-rights-watch-is-proud-to-have-helped-activity-7392486043473833984-jj1i

7.12. The GRH launch on 17 October 2026

The official UK Reparations Conference programme identifies Kwesi Ochosi as chair of the London Global Reparations Hub launch.

That is a significant documented responsibility.

Chairing a public launch generally involves a visible role in facilitating the session, but the precise authority associated with the role cannot be established from the programme alone.

A session chair is not automatically the legal director of an organisation, its financial controller or its sole representative.

The investigation must therefore distinguish his responsibility for chairing the advertised session from any role in forming, governing or financing the GRH.

Further documentation may establish additional responsibilities.

Until then, those responsibilities remain open questions.

7.13. Empress Judah's account of the launch proceedings

Empress Judah's email of 18 October 2026 at 00:50 identifies Kwesi Ochosi as appearing to be the principal facilitator of the GRH launch.

She reports that a participant wished to ask a question about the organisation's formation but was unable to do so because the session was being concluded.

She also refers to contributions from Judy Richards of Global Afrikan Congress UK and other reparations campaigners.

These statements are evidence of Empress Judah's account and the concerns she expressed.

They should not automatically be treated as a complete independent transcript of the event.

The investigation should seek any relevant video recording, session timetable, organiser explanation and independent witness accounts.

The central questions are whether sufficient opportunity existed for public questions, how the session was managed and what arrangements were available for further engagement.

The purpose is to establish whether the circumstances reflected ordinary time management, avoidable communication deficiencies or other matters requiring clarification.

No finding of deliberate suppression of questions has been made.

7.14. The difference between facilitating an event and governing an institution

The distinction between public facilitation and institutional authority is central to this investigation.

An individual may moderate events, coordinate discussions or represent an organisation publicly without possessing legal authority over its complete activities.

Conversely, an individual may hold formal responsibilities that are not apparent from public event programmes.

The investigation must therefore examine the GRH's governing documents, appointment records, official contact arrangements and organisational responsibilities.

It should identify whether Kwesi Ochosi was acting as founder, officer, director, programme coordinator, consultant, community representative or event facilitator in each relevant activity.

These roles must not be treated as interchangeable.

The evidence presently supports his publicly advertised founding association with Building Trust Consortium, his involvement in GRH-related events and his chairing of the London launch.

The full extent of his authority within the GRH remains to be established.

7.15. The original Black Cultural Centre launch advertisement

The original Eventbrite advertisement for the London GRH launch identified the Black Cultural Centre in Islington as the venue for an event scheduled from 6pm to 9pm on 17 October 2026.

The published listing identified Black History Studies as organiser and Building Trust Consortium as host.

It also named Kwesi Ochosi as moderator.

This gives rise to legitimate questions concerning the roles and responsibilities of the organisations associated with the advertised event.

However, naming Kwesi Ochosi as moderator does not independently establish that he created the advertisement, booked the venue or authorised any subsequent changes.

Those matters require original event administration records and explanations from the responsible organisers.

The existence of his name on the listing makes him a relevant person to whom appropriate questions may be directed.

It does not establish personal wrongdoing.

Public source:

London Launch of the Global Reparations Hub, Eventbrite:

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

7.16. The unresolved venue chronology

The available records identify two relevant advertised arrangements on 17 October 2026.

One concerned the GRH launch within the UK Reparations Conference programme at Friends House during the afternoon.

The other concerned the separately advertised Eventbrite event at the Black Cultural Centre in Islington during the evening, subsequently marked as cancelled.

Empress Judah reports that the venue and time were changed.

Her correspondence raises the possibility that the arrangements may have been communicated in a misleading manner.

The investigation must establish whether these were originally separate activities, whether one replaced the other, when decisions were made and what information was provided to participants.

Kwesi Ochosi's documented involvement in the advertised events makes clarification of his organising responsibilities relevant.

However, the existence of a discrepancy between advertised arrangements does not itself establish deliberate deception.

The investigation must examine the documentary chronology before reaching conclusions.

7.17. The suspicion of a deliberate diversion

A serious suspicion has been expressed that the Black Cultural Centre may have been used as a dummy or diversionary venue.

The investigation recognises the potential seriousness of such conduct if it occurred.

A culturally significant community institution should not knowingly be used to mislead people about an important reparations initiative.

Doing so could undermine trust, generate resentment and be perceived as deeply disrespectful.

However, no evidence presently establishes that Kwesi Ochosi personally intended to mislead anyone.

Nor has the investigation established that he authorised the original venue arrangements or their later alteration.

The suspicion must therefore be recorded as a question requiring documentary evidence, not as a conclusion concerning his conduct.

A fair investigation must consider alternative explanations and invite responses from the relevant organisers.

7.18. Relationship between Kwesi Ochosi and Charmaine Simpson

The evidence identifies several areas in which the public activities of Kwesi Ochosi and Charmaine Simpson intersect.

Both were named in a Church-related archival programme.

Charmaine Simpson's public communication described Kwesi Ochosi's work in an archival research context.

Both were named in the GRH launch programme.

Black History Studies and Building Trust Consortium were also identified in the organisation or hosting of GRH-related events.

These records establish documented overlapping participation and organisational associations.

They do not establish the complete nature of the relationship between the two individuals.

The investigation should determine whether any formal working arrangements existed, which institutions authorised them and whether any responsibilities crossed the boundary between Project Spire and the GRH.

Professional collaboration is not itself evidence of misconduct.

The relevant issue is whether institutional relationships and responsibilities are sufficiently transparent.

7.19. Did Project Spire employ or commission Kwesi Ochosi?

This is a central question arising from the newly identified first-hand archival account.

The account describes work at Lambeth Palace Library involving two full-time archival positions connected to Project Spire.

Kwesi Ochosi is named as one of the people alongside whom the author worked.

This provides a strong basis for asking whether he held a formal Project Spire-funded, Church Commissioners-funded or otherwise institutionally authorised appointment.

However, the evidence does not conclusively identify the contracting party.

The investigation should therefore ask the Church Commissioners and Lambeth Palace Library to confirm the arrangements.

A suitably limited institutional statement identifying the role, dates, project funding and reporting responsibilities may be sufficient.

There is no need to demand unrelated personal employment information.

The objective is to establish public accountability for a role associated with an institutionally significant reparatory programme.

7.20. The question of financial connections

The existence of a Project Spire-related research appointment does not establish authority over the proposed £100 million fund.

The investigation must distinguish research expenditure from investment capital, grant-making and reparatory delivery.

An archivist or project coordinator may receive remuneration for research work without exercising authority over the allocation of reparatory resources.

The existence of such remuneration, if established, would not automatically constitute improper conduct.

Nevertheless, the institutional funding of relevant research activities may be a legitimate subject of financial transparency.

The investigation should determine whether archival posts formed part of Project Spire's research and development expenditure and how that expenditure was authorised and recorded.

Any financial relationship between Building Trust Consortium, the GRH and Project Spire must be established independently.

No such relationship should be inferred solely from Kwesi Ochosi's participation in both areas.

7.21. Conflicts of interest and overlapping responsibilities

The documented activities raise questions about how overlapping professional and organisational roles are managed.

A person may properly undertake archival research for one institution and participate in a separate community initiative.

Such participation does not automatically establish a conflict of interest.

However, a relevant conflict might arise where a person's obligations to different institutions create competing interests concerning confidential information, contractual duties, funding decisions, procurement or representation.

The investigation should therefore establish the applicable policies and whether any declarations were required.

It should also distinguish between a potential conflict that has been appropriately managed and an actual conflict affecting an identifiable decision.

No finding of an undisclosed conflict has been made.

The purpose of enquiry is to identify the arrangements through which relevant institutions manage these risks.

7.22. Institutional transparency and community consultation

The central questions raised by Empress Judah concern how the GRH was formed and the extent of prior engagement with longstanding reparations organisations.

Kwesi Ochosi's visible organising and facilitation roles make him a relevant person from whom to seek clarification.

However, the investigation should establish whether he held responsibility for selecting consultees, preparing publicity, determining the launch format or responding to institutional enquiries.

It should also seek the names and roles of any other persons or organisations sharing those responsibilities.

The objective is not to single out one individual where decisions may have been collective.

Rather, it is to identify the actual decision-making structure.

Public information about that structure would assist community understanding and reduce unnecessary speculation.

7.23. Safeguards against anti-Black racism and Institutional Racism

RNL will examine whether appropriate safeguards exist within Project Spire and the GRH's separate organisational arrangements.

The questions concern the possibility that anti-Black racism, racial bias or Institutional Racism could affect governance, engagement, consultation, selection or financial decisions if effective safeguards are absent or inadequate.

These are questions about institutional systems.

They are not accusations directed at Kwesi Ochosi.

The investigation should identify the relevant policies, responsible officers, complaints procedures and independent review mechanisms.

It should also establish how longstanding grassroots organisations can raise concerns without being excluded from future engagement.

The existence of written safeguards must be distinguished from evidence that those safeguards are operational and effective.

7.24. Violence, threats of violence and peaceful conflict prevention

Reparatory justice concerns the historical violence of African chattel enslavement, profound collective grief and potentially substantial financial resources.

RNL maintains that transparency, professional organisation, meaningful consultation and clear accountability are essential safeguards for maintaining peace.

The possibility that unresolved grievances may escalate into intimidation, threats of violence or physical violence should be considered seriously as a preventative institutional matter.

This does not mean that violence is inevitable.

It does not imply that Kwesi Ochosi, Charmaine Simpson or other participants have threatened violence.

Nor does it justify treating legitimate community disagreement as a security threat.

The investigation seeks to prevent escalation by identifying concerns early, establishing the facts, obtaining written explanations and encouraging constructive institutional engagement.

Any references to violence or threats of violence are preventative, not threatening.

No conduct of that nature is being advocated or attributed to named individuals without evidence.

7.25. Questions requiring formal written clarification

The following questions should be directed to the relevant institutions according to their responsibilities.

Question 1: Was Kwesi Ochosi formally appointed as a Project Coordinator and Archivist in connection with Church of England archival research?

Question 2: Which institution employed, commissioned or otherwise authorised his role?

Question 3: What were the exact dates and formal responsibilities of the appointment?

Question 4: Was the appointment funded through Project Spire, the Church Commissioners, Lambeth Palace Library or another source?

Question 5: What reporting and supervisory arrangements applied?

Question 6: Did the responsibilities extend beyond historical research and public engagement into consultation, policy development or programme recommendations?

Question 7: Did Kwesi Ochosi exercise any authority concerning Project Spire's proposed financial allocations, investments, grants or beneficiaries?

Question 8: What is the legal identity and governance structure of Building Trust Consortium?

Question 9: What formal responsibilities did Kwesi Ochosi hold in the establishment, governance and organisation of the Global Reparations Hub?

Question 10: Was any formal arrangement established between Building Trust Consortium, Black History Studies, the GRH and Project Spire?

Question 11: What responsibilities did Kwesi Ochosi hold in relation to the original Black Cultural Centre GRH launch advertisement and the subsequent Friends House arrangements?

Question 12: What documents establish the chronology of the original advertisement, venue decisions, conference programme preparation and notifications to community organisations?

Question 13: Were relevant overlapping professional or organisational roles subject to conflict-of-interest declarations or other institutional safeguards?

Question 14: What public complaints, consultation and accountability arrangements are available to grassroots reparations organisations seeking clarification?

These questions are not allegations.

They identify matters capable of being answered through institutional records and appropriate written explanations.

They are not subject to an arbitrary overall limit on the number of questions that RNL may investigate.

7.26. Right of reply and correction

Kwesi Ochosi should have a fair opportunity to clarify his professional and organisational roles.

The Church Commissioners, Lambeth Palace Library, Building Trust Consortium and GRH organisers should likewise have an opportunity to explain matters within their respective responsibilities.

An event listing or personal recollection may not fully describe a contractual arrangement.

A published job title may have a narrower meaning than a reader initially assumes.

Conversely, institutional records may establish responsibilities not apparent from public programmes.

The investigation must remain open to both possibilities.

Where a response corrects a factual error, RNL should record the correction.

Where evidence supports a further finding, that finding should be explained and sourced.

Where relevant information remains unavailable, the report should describe the unresolved question accurately.

Silence should not automatically be treated as confirmation of misconduct.

7.27. Preliminary evidential assessment

The present investigation has established a materially stronger documentary basis for examining Kwesi Ochosi's relationship with Project Spire-related work than was initially available.

Published records identify him as a Project Coordinator and Archivist in a Church-history archival context.

A first-hand account from a researcher at Lambeth Palace Library describes work alongside him and explicitly associates that archival programme with Project Spire.

The April 2026 Lambeth Palace Library event programme identifies him as a speaker alongside Charmaine Simpson.

The October 2026 GRH materials identify him as moderator of an earlier event and chair of the London launch.

Human Rights Watch's public material also identifies his participation in the wider international GRH initiative through Building Trust Consortium.

Together, these sources provide a clear basis for investigating his professional and organisational involvement across related areas of activity.

However, the records do not establish that he controlled Project Spire, exercised financial authority over the proposed fund or acted improperly in relation to the GRH launch.

They also do not establish that the Church Commissioners authorised or financed the GRH.

These remain distinct questions requiring additional evidence.

7.28. Conclusion: a substantial new documentary connection

The investigation concerning Kwesi Ochosi has developed beyond evidence of participation in public conferences.

The identified sources now include a published professional description and a first-hand account connecting archival research undertaken alongside him with Project Spire.

This strengthens RNL's original investigative trigger concerning overlapping involvement between Project Spire-related activities and the Global Reparations Hub.

The evidence justifies a formal enquiry into the nature of his archival appointment, the institutions responsible for it, the boundaries of his authority and any relevant organisational relationships.

It does not justify predetermined conclusions about improper conduct, conflicts of interest, financial control or deliberate deception.

The investigation must therefore proceed through documentary verification, accurate attribution, independent institutional clarification and a fair right of reply.

The central finding of this section is that Kwesi Ochosi's connection to Project Spire-related archival work now has a substantive documentary foundation, while his separate role in the Global Reparations Hub is also publicly documented.

The next task is to establish precisely what those roles involved, whether any formal institutional relationships connected them, and what safeguards governed the relevant responsibilities.

RNL's objective remains truth, transparency, accountable reparatory justice, professional organisation and the early prevention of avoidable conflict.

SECTION 7 — EVIDENCE REGISTER

Evidence ID	Documented matter	Evidential status
SPIRE-7-001	Kwesi Ochosi named as Project Coordinator and Archivist in public archival engagement material	Published professional description
SPIRE-7-002	Independent researcher describes working alongside Kwesi Ochosi on archival work identified with Project Spire	First-hand published account
SPIRE-7-003	April 2026 Lambeth Palace Library programme identifies Kwesi Ochosi as speaker	Published event programme
SPIRE-7-004	October 2026 conference programme identifies Kwesi Ochosi as GRH launch chair	Official published agenda
SPIRE-7-005	Building Reparative Futures webinar identifies him as moderator	Published organiser listing

SPIRE-7-006	Human Rights Watch public material identifies him in international GRH activities	Published organisational communication
SPIRE-7-007	Original Black Cultural Centre Eventbrite advertisement identifies him as moderator	Published event listing
SPIRE-7-008	Precise contractual employer or commissioning authority for archival work	Outstanding verification
SPIRE-7-009	Authority over Project Spire grants, investments or financial decisions	Not established
SPIRE-7-010	Formal financial or governance relationship between Project Spire and GRH	Not established
SPIRE-7-011	Responsibility for venue changes and communications	Not established
SPIRE-7-012	Applicable conflict-of-interest declarations and safeguards	Outstanding verification

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SOURCES AND INDEPENDENT VERIFICATION

Source 7.1 — Charmaine Simpson, public communication concerning Church of England archives

https://www.linkedin.com/posts/blackhistorystudies_lambethpalacelibrary-churchofengland-churchcommissioners-activity-7399945016523145216-SAcQ

Relevant evidence: Kwesi Ochosi described as Project Coordinator and Archivist.

Source 7.2 — First-hand archival research account

A Glimpse into the Archive: My Placement at Lambeth Palace Library.

https://www.memslib.co.uk/post/a-glimpse-into-the-archive-my-placement-at-lambeth-palace-library

Relevant evidence: Archival appointments and research activity connected to Project Spire, including work alongside Kwesi Ochosi.

Source 7.3 — Lambeth Palace Library event programme, 11 April 2026

https://happeningnext.com/event/routes-in-the-records-ii-church-of-englands-black-history-at-the-archives-eid1ef0kundmm9a

Relevant evidence: Kwesi Ochosi's scheduled presentation and Charmaine Simpson's opening remarks.

Source 7.4 — UK Reparations Conference official agenda, 17 October 2026

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant evidence: Kwesi Ochosi named as chair of the GRH launch and founder of Building Trust Consortium.

Source 7.5 — Building Reparative Futures London, 12 October 2026

https://www.eventbrite.co.uk/e/columbus-day-to-reparations-day-civil-society-led-reparatory-justice-tickets-2002760501573

Relevant evidence: Kwesi Ochosi's moderation role and the named hosting organisations.

Source 7.6 — Human Rights Watch, international GRH announcement

https://www.linkedin.com/posts/human-rights-watch_human-rights-watch-is-proud-to-have-helped-activity-7392486043473833984-jj1i

Relevant evidence: Kwesi Ochosi identified in connection with Building Trust Consortium and the international GRH launch.

Source 7.7 — Original London GRH Eventbrite advertisement

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

Relevant evidence: Original Black Cultural Centre venue, event organisation and advertised moderation.

Source 7.8 — Empress Judah correspondence, 18 October 2026

Emails dated 00:50, 12:28 and 17:50.

Relevant evidence: Community concerns, reported launch proceedings, venue questions and subsequent requests for clarification.

Status: Original correspondence preserved within the RNL investigation record.

Source 7.9 — Project Spire official information

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Relevant evidence: Institutional background, historical research and the proposed fund.

END OF SECTION 7 — KWESI OCHOSI: DOCUMENTED ROLES, CHURCH-RELATED ARCHIVAL ACTIVITIES, GLOBAL REPARATIONS HUB RESPONSIBILITIES AND QUESTIONS OF INSTITUTIONAL AUTHORITY

NEXT: SECTION 8 OF 24 — OTHER INDIVIDUALS AND ORGANISATIONS: DOCUMENTED PARTICIPANTS, GOVERNANCE RELATIONSHIPS, CONSULTATION NETWORKS AND INSTITUTIONAL BOUNDARIES.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 8 OF 24

OTHER INDIVIDUALS AND ORGANISATIONS: DOCUMENTED PARTICIPANTS, GOVERNANCE RELATIONSHIPS, CONSULTATION NETWORKS AND INSTITUTIONAL BOUNDARIES

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Preliminary documentary findings. Historical appointments and institutional relationships identified; present responsibilities and outstanding questions require verification.

8.1. Purpose of this section

The previous sections examined the documented involvement of Charmaine Simpson and Kwesi Ochosi in activities associated with the Church Commissioners, Project Spire, Church-related archival research and the Global Reparations Hub (GRH).

Those findings provide a substantive documentary foundation for further investigation.

However, Project Spire and the GRH cannot be understood adequately through an examination of two individuals alone.

Both operate within wider environments involving institutions, appointed officers, researchers, advisers, community organisations, financial structures and public events.

This section therefore identifies other relevant individuals and organisations, distinguishes their documented responsibilities and examines what evidence would be required before institutional relationships could properly be established.

Particular attention is given to the Church Commissioners, the Project Spire Oversight Group, the proposed Fund for Healing, Repair and Justice, the Global Reparations Hub, Building Trust Consortium, Black History Studies, Human Rights Watch, the UK Reparations Conference organisers, the Quakers and independent Black/Afrikan grassroots reparations organisations.

The objective is to establish an accurate map of institutional responsibilities.

The presence of an individual in multiple professional or community settings must not automatically be treated as evidence that those settings share governance, finances or authority.

At the same time, documented overlaps should not be dismissed when they raise legitimate questions concerning consultation, transparency, institutional relationships and accountability.

The investigation must establish the facts, identify relevant decision-makers and invite clarification from the organisations concerned.

8.2. Why a wider institutional examination is necessary

The investigation's original trigger concerned possible overlapping involvement between individuals associated with Project Spire-related work and the GRH launch.

Subsequent research identified documentary evidence supporting that connection.

The next stage requires examination of the organisations through which those individuals operated.

A person may be employed by one institution, provide services to another, hold a position in a third and participate independently in public events.

Such arrangements may be entirely legitimate.

However, without clear institutional information, ordinary members of the public may find it difficult to determine who is responsible for particular decisions.

This uncertainty becomes important where reparations initiatives involve historical suffering, representation of affected communities, consultation and substantial proposed financial commitments.

The investigation therefore seeks to identify the legal entity behind each initiative, the individuals authorised to make decisions, the nature of any formal partnership and the mechanisms through which affected communities can obtain information or raise concerns.

A documented relationship must be distinguished from an inferred association.

An inferred association must be distinguished from an allegation of wrongdoing.

8.3. The Church Commissioners for England

The Church Commissioners for England are the principal institution responsible for the Project Spire programme.

Their publicly stated response to historical connections with African chattel enslavement includes the proposed £100 million Fund for Healing, Repair and Justice.

The Church Commissioners are a registered charitable institution operating within an established statutory and regulatory framework.

This institutional identity is important because it identifies the body whose trustees and authorised officers bear responsibility for decisions made in the Commissioners' name.

The Church Commissioners should not be confused with individual dioceses, parishes, church officials, conference organisers or independent organisations merely because those entities may participate in Church-related discussions.

The investigation must therefore identify which decisions were formally taken by the Commissioners, which activities were undertaken by their employees or contractors and which activities belonged to separate organisations.

The Commissioners' existing governance documents, public accounts, official announcements and regulatory records provide the starting point.

Independent verification:

Charity Commission register:
https://register-of-charities.charitycommission.gov.uk/

Church Commissioners' Project Spire information:
https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

8.4. The Church Commissioners' trustees and senior officers

The formal responsibilities of trustees and authorised senior officers are distinct from the responsibilities of external researchers, advisers or public engagement personnel.

The investigation must establish who is authorised to make decisions concerning the proposed fund, what approvals are necessary and how responsibilities are delegated.

This includes distinguishing the Church Commissioners' Board of Governors from the proposed governing arrangements of any new charitable or investment entity.

The identity and authority of relevant decision-makers must be verified from current institutional records.

Historical office holders must not automatically be treated as the persons presently responsible.

The appropriate questions concern who approved the £100 million commitment, who oversees its implementation, who deals with the Charity Commission and who has authority to approve subsequent financial decisions.

Where responsibilities have changed over time, those changes should be recorded with dates.

This is necessary because the investigation seeks institutional accountability rather than merely the identification of prominent names.

8.5. The Project Spire Oversight Group

The Church Commissioners announced the appointment of an independent Oversight Group in July 2023 to advise on their response to historical connections with African chattel enslavement.

The Group's published membership and recommendations constitute important documentary evidence.

The Oversight Group should not automatically be treated as the eventual trustee body of the proposed fund.

Its original advisory responsibilities must be distinguished from any subsequent role in implementation, appointment, oversight or financial decision-making.

The Church Commissioners should explain which recommendations were accepted, how they were incorporated into programme design and whether any members subsequently assumed separate responsibilities.

Primary source:

Church of England — Announcement of the Oversight Group:

https://www.churchofengland.org/media/press-releases/church-commissioners-announce-members-oversight-group-advise-response-historic

8.6. Bishop Rosemarie Mallett and Geetha Tharmaratnam

The Church Commissioners' original announcement identified the Right Reverend Dr Rosemarie Mallett, Bishop of Croydon, as Chair of the Oversight Group.

Geetha Tharmaratnam was identified as Vice-Chair.

These appointments are significant because they establish the original leadership of the independent body advising on the development of the reparatory response.

The Oversight Group subsequently produced recommendations concerning the proposed Fund for Healing, Repair and Justice.

However, the investigation must distinguish leadership of the advisory group from authority over the Church Commissioners' endowment and any eventual fund distributions.

The current status of the Group and any continuing responsibilities held by its former or present members require confirmation.

The investigation should seek formal terms of reference, appointment dates, the extent of delegated authority and the outcome of the recommendations.

8.7. Other members of the Oversight Group

The July 2023 Church Commissioners announcement identifies the following additional members:

Roy Swan, associated with mission investment expertise.

Tara Sabre Collier, associated with impact investment and sustainable finance.

Derek Bardowell, associated with community wealth creation and philanthropic work.

Esther Stanford-Xosei, identified in connection with legal and reparations activism.

Priscellia Robinson, identified among the group's legal specialists and activists.

Patrick Vernon, associated with public advocacy and social commentary.

Alex Renton, journalist and author.

Jonathan Guthrie, financial journalist.

Dr Christienna Fryar, historian and academic.

Professor Richard Drayton, historian and academic.

Reverend Canon Dr Anderson Jeremiah, theologian and academic.

Reverend Canon Dr Michael Clarke, theologian and academic.

These names originate from the Church Commissioners' published announcement and therefore provide an identifiable historical membership record.

Their inclusion does not establish that every individual continues to hold the same role in October 2026.

Nor does membership of the original advisory group establish that the individual currently administers the proposed £100 million fund.

The investigation should obtain confirmation of the Group's present status, any changes in membership and any subsequent appointments arising from its recommendations.

8.8. The Oversight Group's 2024 report

On 4 March 2024, the Church Commissioners announced that their Board of Governors had welcomed the Oversight Group's report.

The report proposed the development of the Fund for Healing, Repair and Justice, including principles concerning Black leadership, community engagement and the use of financial resources.

This document is important because it provides an original reference against which later institutional developments may be assessed.

RNL must distinguish between a recommendation, the Commissioners' acceptance of that recommendation, an approved implementation decision and an operational arrangement.

Those stages are not interchangeable.

The report should be examined to establish what was recommended concerning governance, consultation, investment, grant-making, accountability and beneficiary communities.

It should also be used to identify whether later arrangements materially departed from the original proposals.

Primary sources:

Church Commissioners — Response to Oversight Group report, 4 March 2024:

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

Oversight Group report (PDF):

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

8.9. The proposed Fund for Healing, Repair and Justice

The proposed Fund for Healing, Repair and Justice must be treated as a distinct legal and financial question.

The Church Commissioners' commitment to provide resources does not automatically establish that a separate fund entity has completed registration, received regulatory approval or commenced operations.

The official fund website indicates that work continues on its structure, governance and delivery arrangements.

The investigation must therefore identify the proposed legal owner or administrator of the fund, its governing documents, trustees or directors, financial arrangements and regulatory status.

It must also establish whether any appointments or financial activities have occurred before full operation.

No person should be described as a current fund trustee or financial controller solely because they previously served on the Oversight Group.

Public reference:

https://hrjfund.org/

8.10. The Charity Commission for England and Wales

The Charity Commission is a relevant regulator concerning the charitable authorisations and governance arrangements associated with Project Spire.

Its role is legally distinct from the role of the Church Commissioners and from the role of any proposed fund manager.

The investigation should identify which authorisations were requested, which decisions have been made and what conditions may apply.

However, the Charity Commission should not be described as responsible for organising Project Spire's community engagement or the GRH launch merely because it regulates charitable bodies.

RNL may seek publicly available regulatory records and, where appropriate, request information held by the Commission through lawful information-access procedures.

The existence of regulatory scrutiny does not itself establish wrongdoing.

It is an ordinary element of charitable accountability.

8.11. Lambeth Palace Library and archival research

Lambeth Palace Library appears in the documentary record because of Church of England Black-history research and the *Routes in the Records* engagement programme.

Published materials identify archival activities involving Charmaine Simpson and Kwesi Ochosi.

A first-hand account examined in Section 7 associates relevant archival research with Project Spire.

The precise relationship between the Library, the Church Commissioners and the individuals undertaking research should be established.

This includes identifying the institution responsible for commissioning the research, employing or engaging staff, supervising records work and deciding how findings would be used.

Archival research may contribute to public historical understanding without conferring financial or governance authority over the proposed fund.

The distinction between research responsibility and reparatory decision-making must remain clear.

8.12. Black History Studies

Black History Studies is an important organisation in the present investigation because Charmaine Simpson is publicly identified as its CEO and co-founder.

The published GRH launch materials also identify Black History Studies in the event-organiser arrangements.

The 12 October 2026 *Building Reparative Futures* webinar listed Black History Studies as organiser and identified the GRH and Building Trust Consortium among the hosting organisations.

These are documented associations.

They provide grounds for examining how the events were planned and communicated.

They do not establish that Black History Studies controlled Project Spire or had authority over its financial arrangements.

The investigation should distinguish the organisation's public educational activities from any responsibilities it may have accepted in connection with the GRH launch.

If contracts or other formal agreements existed, they should be identified through appropriate documentary enquiries.

Source:

https://www.eventbrite.co.uk/e/columbus-day-to-reparations-day-civil-society-led-reparatory-justice-tickets-2002760501573

8.13. Building Trust Consortium

Building Trust Consortium is relevant because Kwesi Ochosi was publicly identified as its founder and because the organisation was named in GRH-related event arrangements.

The original Eventbrite advertisement for the Black Cultural Centre launch identified Building Trust Consortium as host.

The separate 12 October webinar also named the organisation among the hosts.

These records establish advertised involvement in the relevant events.

However, the consortium's complete legal identity, governance arrangements, financial responsibilities and contractual relationship with the GRH remain to be established.

The investigation must not assume that the term *consortium* necessarily describes a separate incorporated body.

A formal enquiry should request clarification of its organisational structure, responsible officers and role in the GRH's formation and launch.

8.14. The Global Reparations Hub

The Global Reparations Hub is the subject of RNL's separate comprehensive investigation.

It must not be presented as a subsidiary, department or financial programme of Project Spire without documentary evidence establishing such a relationship.

The GRH has been publicly described as an initiative intended to support reparations-related civil society engagement and connections.

The October 2026 London launch forms part of the immediate background to the present investigation.

However, the precise legal identity, ownership, governance, funding arrangements and institutional responsibilities of the GRH require continued verification.

RNL has already sought official contact information and identified difficulties in establishing a verified institutional correspondence channel.

Those questions remain within the separate GRH investigation.

For Project Spire, the relevant task is narrower: establish whether any legal, financial, staffing, contractual or governance relationship exists between the GRH and the Church Commissioners' programme.

8.15. Human Rights Watch and international participation

Human Rights Watch publicly stated that it helped create the Global Reparations Hub and promoted its earlier international launch in Berlin.

Its published announcement identified Kwesi Ochosi among the participants, representing Building Trust Consortium in the United Kingdom.

This is important because it establishes that GRH activity extended beyond the London launch.

It also indicates that the GRH's international development involved organisations and participants beyond the local conference.

However, Human Rights Watch's involvement in the GRH does not establish its involvement with Project Spire.

Nor does it establish that Human Rights Watch controlled the London launch's venue arrangements.

The investigation should distinguish organisational participation, public endorsement, programme development and legal governance.

Each may involve different responsibilities.

Public source:

https://www.linkedin.com/posts/human-rights-watch_human-rights-watch-is-proud-to-have-helped-activity-7392486043473833984-jj1i

8.16. The APPG for Afrikan Reparations and the UK Reparations Conference

The All-Party Parliamentary Group for Afrikan Reparations is relevant because its published conference programme identifies the London GRH launch and the individuals scheduled to participate.

The official agenda is therefore a primary source for establishing the public programme.

However, an APPG's participation in or association with a conference does not automatically establish that it created, owned or governed every organisation presenting at the event.

The investigation must distinguish the conference's overall organisers from the organisers of individual sessions and separately advertised activities.

It should seek clarification concerning who approved the inclusion of the GRH launch, when that decision was made and who supplied the relevant programme information.

These questions are particularly important to the unresolved chronology of the Black Cultural Centre advertisement.

Primary source:

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

8.17. The Quakers and Friends House

Friends House in Euston was the venue for the UK Reparations Conference on 17 October 2026.

The official programme identifies Rita Remi-Judah, Co-Clerk of the Quakers Reparations Working Group, in the conference welcome and the GRH launch session.

These are documented roles.

However, they do not establish that the Quakers or Friends House management possessed legal authority over the GRH or Project Spire.

The provision or hosting of conference facilities must be distinguished from ownership or governance of organisations using those facilities.

Nevertheless, the conference programme chronology may require clarification from the relevant organisers and venue authorities.

This is particularly important because Empress Judah questioned how the GRH launch came to be included in the conference programme while the Black Cultural Centre event was also being advertised.

The investigation should ask which organisation controlled the relevant conference timetable and when the programme was finalised.

8.18. Rita Remi-Judah

Rita Remi-Judah is specifically relevant because the official conference programme identifies her both as a Co-Clerk of the Quakers Reparations Working Group and as a participant in the GRH launch.

This establishes involvement in the conference proceedings.

It does not establish that she governed the GRH or was responsible for the original Black Cultural Centre advertisement.

Nor does the similarity between her name and that of Empress Judah justify treating them as the same person.

The investigation must preserve their separate identities unless independently verified evidence establishes a relationship.

Any enquiry concerning Rita Remi-Judah should therefore focus upon her documented role and the responsibilities, if any, associated with the conference programme or the GRH launch.

8.19. Other named GRH launch participants

The official conference programme identifies additional participants in the GRH launch, including Dr Chevy Eugene, Councillor Antoinette Fernandez, Zahra Bei, Imaan Odeleye and Ryan Dube.

These individuals were publicly associated with the advertised session.

Their inclusion demonstrates that the launch involved participants from multiple organisational and professional backgrounds.

However, participation does not automatically establish that any individual was a founder, trustee, funder or governing officer of the GRH.

The investigation should not infer decision-making authority from a speaker's position in an agenda.

Where a person's responsibilities become relevant to an identifiable question, those responsibilities should be verified through appropriate records.

The purpose of including these names is to preserve the documentary history and identify possible sources of clarification, not to extend suspicion to every participant.

8.20. Global Afrikan Congress UK and Judy Richards

Global Afrikan Congress UK is relevant because Empress Judah's correspondence identifies it among longstanding organisations concerned about the GRH launch.

She also describes an intervention by Judy Richards during the session.

The official conference programme separately identifies Judy L. Richards, General Secretary of Global African Congress, as a participant in a session concerning grassroots organising and Pan-Afrikan councils.

These records provide evidence of the organisation's presence within the wider conference context.

Empress Judah's account of the GRH discussion should nevertheless be verified through original recordings or independent testimony where practicable.

The concerns expressed by grassroots organisations must be accurately attributed and must not automatically be presented as the unanimous view of all participants.

The investigation should examine whether relevant organisations were included in consultation processes and whether their contributions were recorded and considered.

8.21. Esther Stanford-Xosei and the question of overlapping reparations activity

Esther Stanford-Xosei is a particularly relevant person to identify accurately because she was named in the original Project Spire Oversight Group and also appears in the wider UK reparations movement.

The official 2026 conference programme identifies Esther Xosei in sessions concerning legal strategies and reparatory justice.

This provides evidence of participation in wider public reparations activity.

However, it does not demonstrate that she governed the GRH launch.

Nor does her historical Oversight Group membership establish current authority over the proposed fund.

The investigation should distinguish her earlier advisory appointment, her wider campaigning activities and any subsequently confirmed institutional responsibilities.

This is another example of why a person-and-role register is necessary.

8.22. Other grassroots and Pan-Afrikan organisations

Empress Judah's correspondence identifies additional longstanding organisations and campaigners whose participation and consultation she considers important.

These include organisations associated with the annual reparations march, RasTafari and Pan-Afrikan movements, and other independent community initiatives.

Such organisations may possess longstanding experience that is relevant to discussions about reparatory justice.

The investigation should examine how Project Spire identifies and consults affected communities and whether independent organisations can participate without belonging to established Church or institutional networks.

However, the presence of an organisation's name in correspondence does not automatically establish that it endorsed the correspondence or authorised the writer to represent it.

That distinction must be preserved.

The investigation should encourage organisations to provide their own statements and documentary evidence where they wish to do so.

8.23. The Black Cultural Centre in Islington

The Black Cultural Centre is relevant because it appeared as the original advertised venue for the separate London GRH launch.

The Eventbrite listing identified a scheduled event on 17 October 2026 from 6pm to 9pm.

The listing subsequently displayed a cancellation status.

These published arrangements must be examined alongside the afternoon launch recorded in the official conference programme.

However, the presence of the Centre's name in an advertisement does not establish that the Centre authorised the event or that a completed booking existed.

Nor does it establish that its management knew of any subsequent change.

The investigation must establish the identity of the responsible management organisation, its booking procedures and the documentary history of the proposed event.

The concern that the Centre might have been used as a misleading or diversionary advertised venue remains serious but unresolved.

Its proper investigation belongs to the separate Black Cultural Centre enquiry, with relevant evidence cross-referenced where appropriate.

Original Eventbrite listing:

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

8.24. Institutional boundaries and the risks of conflation

The documentary record now identifies several distinct categories of involvement.

The Church Commissioners possess institutional responsibilities concerning Project Spire.

The historical Oversight Group provided recommendations.

Lambeth Palace Library has been associated with relevant archival research.

Charmaine Simpson and Kwesi Ochosi appear in Church-related research and public engagement records.

Black History Studies and Building Trust Consortium appear in GRH event arrangements.

Human Rights Watch publicly identified its involvement in the international GRH initiative.

The APPG conference programme identifies the London launch and its participants.

Friends House served as the conference venue.

The Black Cultural Centre appeared in the original separate Eventbrite advertisement.

Independent grassroots organisations have expressed concerns about consultation and representation.

These relationships form an interconnected field of activity, but they do not amount to a single institution.

The investigation must therefore identify where authority, money, information and responsibility actually moved.

The existence of a shared person, venue, event or subject does not establish that these institutions share governance or financial control.

8.25. Financial accountability across institutional boundaries

Financial relationships require especially careful verification.

The proposed £100 million Project Spire commitment must not be confused with the financial resources of the GRH, Black History Studies, Building Trust Consortium, Human Rights Watch or any conference organiser.

The investigation must determine whether any contracts, grants, research payments, sponsorships or other financial arrangements link these bodies.

Where payments are identified, their purpose, authorisation, recipient, date and source should be documented.

Payment for legitimate research or event services is not automatically evidence of wrongdoing.

Likewise, participation in an event does not prove receipt of funding.

RNL's established distinctions remain mandatory:

An announcement is not an allocation.

An allocation is not a transfer.

A transfer is not necessarily receipt.

Receipt is not independently verified delivery.

Every financial relationship must be supported by appropriate evidence.

8.26. Safeguards, community trust and institutional accountability

The importance of the institutional map extends beyond identifying names.

The investigation seeks to understand whether the relevant institutions have effective procedures for consultation, conflict-of-interest declarations, organisational responsibility, complaints, corrections and independent review.

The possibility of anti-Black racism and Institutional Racism within institutional decision-making must also be addressed through evidence of relevant safeguards.

This is an enquiry into institutional systems, not a general accusation against the individuals identified in this section.

Community members should be able to establish who is responsible for decisions, how questions may be submitted, and what independent remedies or complaints procedures exist.

Where responsibilities are unclear, the investigation should request clarification rather than infer wrongdoing.

Transparent institutional boundaries are essential to meaningful accountability.

8.27. Prevention of violence and threats of violence

RNL's universal principle concerning violence and threats of violence applies throughout this investigation.

Reparations concern profound historical suffering, inherited grief, contested responsibilities and potentially substantial financial resources.

Where organisational arrangements are unclear, community confidence may be undermined.

The possibility of escalating grievances, intimidation, threats of violence or violence must therefore be considered seriously as a preventative matter.

However, no such conduct is attributed to any named person or organisation in this section.

The objective is to reduce the possibility of conflict through early scrutiny, accurate documentation, transparent organisation and fair opportunities for institutional response.

Professional accountability and peaceful conflict prevention are complementary responsibilities.

The investigation will pursue both without using the prospect of violence as a threat or as pressure upon any individual.

8.28. The institutional relationship questions requiring answers

The evidence now supports a coordinated set of documentary enquiries.

First, the Church Commissioners should identify the current institutional officers responsible for Project Spire and the proposed fund.

Second, the present status of the original Oversight Group and any successor governance arrangements should be confirmed.

Third, the relationship between Project Spire and Lambeth Palace Library's archival activities should be documented.

Fourth, the professional appointment arrangements concerning Charmaine Simpson and Kwesi Ochosi should be clarified to the extent relevant to the programme.

Fifth, the legal and organisational identities of the GRH and Building Trust Consortium should be established.

Sixth, any formal relationships between Project Spire, the GRH, Black History Studies, Building Trust Consortium or other organisations should be identified.

Seventh, the responsible organisers should explain the original Black Cultural Centre advertisement and the subsequent conference arrangements.

Eighth, the institutions involved should identify their consultation, safeguarding, complaints and conflict-of-interest procedures.

Each question should be directed to the institution capable of answering it.

The Church Commissioners must not automatically be expected to possess records controlled by unrelated organisations.

Likewise, the GRH organisers cannot automatically speak for Project Spire.

8.29. Preliminary findings

The investigation has established that the Church Commissioners created an advisory Oversight Group to assist in developing their response to historical links with African chattel enslavement.

The Group's membership and recommendations are publicly documented.

Separate published records establish Charmaine Simpson's professional association with Church Commissioners research and engagement work and her participation in the GRH launch.

Additional records establish Kwesi Ochosi's involvement in relevant Church-history archival activities and his separate GRH organising and facilitation roles.

Black History Studies and Building Trust Consortium were publicly identified in GRH-related event arrangements.

Human Rights Watch publicly acknowledged involvement in creating the international GRH initiative.

The UK Reparations Conference programme confirms the London launch and names relevant participants.

These records establish multiple points of documented involvement and association.

They do not establish that all the organisations form one governing structure, that Project Spire funded or controlled the GRH, or that any person engaged in misconduct.

The precise institutional and financial relationships remain the subject of further enquiry.

8.30. Conclusion: institutional clarity before institutional conclusions

The expanding documentary record demonstrates why Project Spire must be examined within its wider organisational context.

The original concern about overlapping involvement was not imaginary or unsupported once relevant public records were identified.

Those records provide a factual basis for examining the participation of Charmaine Simpson and Kwesi Ochosi in related Church-history and reparations activities.

They also identify a wider network of organisations, advisers, campaigners and institutions whose distinct responsibilities must be understood.

However, the existence of a network does not establish a conspiracy, financial relationship, conflict of interest or improper institutional control.

The purpose of this investigation is not to convert professional association into misconduct.

It is to establish which relationships are formal, which are informal, which are historical, which remain active and which involve responsibility for decisions or resources.

The findings must remain accessible to ordinary readers and supported by links to original evidence wherever possible.

RNL will continue to pursue the relevant questions independently, with proper attribution, a fair right of reply and a commitment to correcting inaccuracies.

The central finding of Section 8 is that Project Spire and the GRH operate within a documented field of overlapping professional, historical and reparations activities, but their precise legal, financial and governance relationships remain to be established.

Clear institutional boundaries, competent organisation, transparency and accountable decision-making are necessary to protect public confidence and promote the peaceful advancement of reparatory justice.

SECTION 8 — INSTITUTIONAL EVIDENCE REGISTER

Evidence ID	Organisation or relationship	Evidential position
SPIRE-8-001	Church Commissioners for England	Principal Project Spire institution
SPIRE-8-002	Original Oversight Group	Membership and advisory role documented

SPIRE-8-003	Fund for Healing, Repair and Justice	Proposed structure; operational arrangements subject to verification
SPIRE-8-004	Lambeth Palace Library	Documented Church-history archival activities
SPIRE-8-005	Black History Studies	Named GRH event organiser
SPIRE-8-006	Building Trust Consortium	Named GRH event host; legal structure requires verification
SPIRE-8-007	Global Reparations Hub	Public initiative; separate institutional identity and governance under investigation
SPIRE-8-008	Human Rights Watch	Publicly acknowledged involvement in international GRH development
SPIRE-8-009	UK Reparations Conference	Published agenda confirms GRH launch
SPIRE-8-010	Quakers Reparations Working Group	Named conference and GRH participant through Rita Remi-Judah
SPIRE-8-011	Black Cultural Centre	Original advertised venue; booking and authorisation unresolved
SPIRE-8-012	Independent Black/Afrikan organisations	Consultation concerns recorded in correspondence
SPIRE-8-013	Formal Project Spire–GRH financial relationship	Not established
SPIRE-8-014	Shared Project Spire–GRH governance	Not established
SPIRE-8-015	Conflicts-of-interest declarations concerning identified overlapping roles	Further verification required

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SOURCES AND INDEPENDENT VERIFICATION

Source 8.1 — Church Commissioners: Original Oversight Group membership, July 2023

https://www.churchofengland.org/media/press-releases/church-commissioners-announce-members-oversight-group-advise-response-historic

Purpose: Original advisory appointments, named members and professional backgrounds.

Source 8.2 — Church Commissioners: Response to Oversight Group report, 4 March 2024

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

Purpose: Institutional response to recommendations concerning the fund.

Source 8.3 — Oversight Group report (PDF)

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Purpose: Original proposals concerning governance, Black leadership, investment, consultation and reparatory objectives.

Source 8.4 — Fund for Healing, Repair and Justice

https://hrjfund.org/

Purpose: Published implementation information and fund-development status.

Source 8.5 — UK Reparations Conference 2026 official agenda

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Purpose: Names GRH launch participants, conference sessions and institutional affiliations.

Source 8.6 — Building Reparative Futures webinar, 12 October 2026

https://www.eventbrite.co.uk/e/columbus-day-to-reparations-day-civil-society-led-reparatory-justice-tickets-2002760501573

Purpose: Documents Black History Studies, Building Trust Consortium and GRH event participation.

Source 8.7 — Original London GRH launch advertisement

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

Purpose: Original Black Cultural Centre event, advertised speakers, organiser and host. The published listing displays a cancellation; the precise history requires verification.

Source 8.8 — Human Rights Watch public GRH announcement

https://www.linkedin.com/posts/human-rights-watch_human-rights-watch-is-proud-to-have-helped-activity-7392486043473833984-jj1i

Purpose: Human Rights Watch's public identification of involvement in the international initiative.

Source 8.9 — Project Spire official FAQs

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Purpose: Institutional, financial and programme background.

Source 8.10 — Empress Judah correspondence

Emails dated 18 October 2026 at 00:50, 12:28 and 17:50.

Purpose: Contemporaneous community concerns, venue questions, consultation issues and proposed future action.

Status: Original private correspondence held in the RNL investigation record.

END OF SECTION 8 — OTHER INDIVIDUALS AND ORGANISATIONS: DOCUMENTED PARTICIPANTS, GOVERNANCE RELATIONSHIPS, CONSULTATION NETWORKS AND INSTITUTIONAL BOUNDARIES

NEXT: SECTION 9 OF 24 — THE GLOBAL REPARATIONS HUB LAUNCH: PLANNING, ORGANISATION, RESPONSIBILITIES, COMMUNICATIONS AND EVENTS OF 17 OCTOBER 2026.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 9 OF 24

THE GLOBAL REPARATIONS HUB LAUNCH: PLANNING, ORGANISATION, RESPONSIBILITIES, COMMUNICATIONS AND EVENTS OF 17 OCTOBER 2026

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Preliminary documentary examination; the sequence of venue decisions, extent of consultation, planning responsibilities and relevant institutional relationships remain under investigation.

9.1. Purpose of this section

This section examines the planning, organisation, publicity, communication arrangements and reported events surrounding the London launch of the Global Reparations Hub (GRH) on Saturday 17 October 2026.

Although the Global Reparations Hub is the subject of a separate independent investigation by Reparation Nation Limited (RNL), its London launch is directly relevant to the origin of the Project Spire investigation.

The relevance arises from documentary evidence that individuals involved in the launch also participated in Church Commissioners research, engagement and archival activities associated with Project Spire.

The purpose of examining the launch here is therefore specific.

RNL seeks to establish what occurred, who was responsible for organising the relevant activities, how community consultation was undertaken, how the venue arrangements developed, and whether the documented overlap of individuals has any formal institutional significance for Project Spire.

The investigation must avoid transferring responsibility from one organisation to another without evidence.

The Church Commissioners must not automatically be held responsible for activities associated with the GRH merely because individuals involved in those activities also undertook Church-related work.

Equally, the existence of documented overlapping involvement justifies seeking clarification concerning institutional relationships, professional responsibilities, transparency and safeguards.

9.2. The significance of launching a reparations institution

The public launch of an organisation presented as a global reparations hub carries significance beyond the practical arrangements of an ordinary conference session.

Reparatory justice concerns historical violence, enslavement, dispossession, intergenerational grief, continuing experiences of injustice, recognition, dignity and expectations of financial and institutional repair.

Many Black/Afrikan grassroots organisations and individual campaigners have devoted substantial periods of time to advancing reparatory justice.

Some have developed historical evidence, organised marches, engaged with governments, assisted affected communities and sustained campaigns over decades.

The creation or introduction of a new organisation using the language of global reparations may therefore generate legitimate questions concerning representation, authority, consultation, governance, resources and accountability.

These questions become particularly important where new initiatives may subsequently participate in decisions involving substantial financial resources or influence the direction of reparations policy.

For this reason, transparency and competent organisation should be established from the outset.

The importance of these standards does not imply that the GRH was improperly formed.

It explains why the events surrounding its launch merit careful documentary examination.

9.3. The Global Reparations Hub as a distinct initiative

The Global Reparations Hub must be distinguished from the Church Commissioners' Project Spire.

The GRH has been publicly associated with a wider international reparations initiative and with organisations involved in civil society engagement.

Project Spire concerns the Church Commissioners' institutional response to their historical connections with African chattel enslavement and the proposed Fund for Healing, Repair and Justice.

Both address reparatory justice, but a common subject does not establish a common legal identity.

The investigation has identified individuals participating in activities associated with both areas.

However, their participation does not establish that the Church Commissioners created, financed, controlled or governed the GRH.

The precise institutional relationships require documentary evidence.

The GRH's formation, governance, legal identity and international arrangements are examined in RNL's separate GRH investigation.

This section considers only those aspects of the launch necessary to understand the Project Spire investigative trigger and any possible institutional relationships.

9.4. The original Black Cultural Centre advertisement

The original advertised arrangements for the London GRH launch identified the Black Cultural Centre in Islington as the venue for an event scheduled for Saturday 17 October 2026.

The Eventbrite listing advertised an evening event from 6pm to 9pm.

Earlier examination of the listing identified Black History Studies in the organiser information and Building Trust Consortium as host.

The listing also associated Kwesi Ochosi with the event.

This advertisement is central to the present investigation because it appears to describe arrangements different from the afternoon GRH launch incorporated into the UK Reparations Conference programme at Friends House.

The existence of the two published arrangements raises questions concerning whether they were originally intended as separate events, whether one replaced the other, and when any changes were agreed.

However, the presence of the Black Cultural Centre's name in the advertisement does not itself establish that the Centre's management had approved or confirmed a booking.

That question requires documentary verification.

Original evidence link:

London Launch of the Global Reparations Hub — Eventbrite:

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

The listing was previously examined in this investigation, but its current page could not be directly retrieved during the preparation of this section. The precise original publication and amendment history remains outstanding.

9.5. Empress Judah's discovery of the advertisement

In her email circulated at 00:50 on Sunday 18 October 2026, Empress Judah stated that she discovered the original Eventbrite advertisement on 14 October 2026.

She explained that she circulated the information to various grassroots reparations organisations and individuals.

This is a significant contemporary account.

It establishes that Empress Judah reported learning of the advertised Black Cultural Centre event shortly before the scheduled launch and took steps to inform others.

However, the date on which she discovered the advertisement is not necessarily the date on which the organisers created or first published it.

An accurate chronology requires the original Eventbrite creation date, publication timestamp, amendment history and any related organiser communications.

Without those records, the investigation must not assume precisely when the arrangements were first decided or publicised.

9.6. The subsequent communication concerning a change of venue and time

Empress Judah's correspondence states that another communication was subsequently circulated by Charmaine Simpson advising that the launch time and venue had changed.

The revised arrangements placed the GRH launch within the UK Reparations Conference at Friends House, Euston.

This reported communication is important because it may provide direct evidence of the organisers' description of the change.

Its original wording matters.

A message describing a relocation, cancellation, replacement or additional event may have different implications.

The investigation therefore requires the original communication, including its date, sender, subject, recipients and complete explanatory text.

In her later email of 18 October 2026 at 17:50, Empress Judah stated that the change notification had already been supplied.

RNL should preserve the original message and examine it independently.

Until that examination is completed, the investigation should continue to distinguish Empress Judah's account of the communication from the original communication itself.

9.7. The official UK Reparations Conference programme

The published UK Reparations Conference agenda for Saturday 17 October 2026 contains a separate item titled *London Launch of the Global Reparations Hub*.

It records the launch as beginning at 14:25 in the Waldo Williams room.

The programme identifies Kwesi Ochosi, founder of Building Trust Consortium, as chair.

The named participants are:

Dr Chevy Eugene, associated with Dalhousie University; Rita Remi-Judah, Co-Clerk of the Quakers Reparations Working Group; Councillor Antoinette Fernandez; Charmaine Simpson, CEO of Black History Studies; Zahra Bei and Imaan Odeleye of No More Exclusions; and Ryan Dube of the #TeesToThames Reparations Project.

The programme therefore provides an identifiable public record of the advertised afternoon session.

It does not establish the date on which that session was first included in the agenda.

Nor does the published programme alone establish every attendee's actual participation or the precise events that took place during the session.

Those matters may require recordings, organiser records and witness accounts.

Official verification source:

UK Reparations Conference 2026 — Agenda:

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant heading: *London Launch of the Global Reparations Hub*, starting at 14:25.

9.8. The important discrepancy between the advertised arrangements

The two identified arrangements require careful comparison.

The Black Cultural Centre advertisement described an evening launch.

The official conference programme identified an afternoon launch at Friends House.

The locations and advertised times differed.

According to Empress Judah, a subsequent communication described a change of venue and time.

However, the evidence reviewed so far does not establish whether the two advertisements originally concerned separate activities, successive versions of the same activity or some other arrangement.

This distinction is central.

It would be premature to conclude that the Black Cultural Centre was deliberately used as a diversion merely because the conference programme also contained a launch session.

Nevertheless, the existence of the apparently different arrangements provides a concrete reason to investigate the decision-making chronology.

The issue cannot be resolved satisfactorily through speculation.

It requires original records.

9.9. The printed conference programmes

In her email of 18 October 2026 at 12:28, Empress Judah questioned how the conference had already prepared printed delegate programmes containing the GRH launch.

Her concern was that the availability of printed programmes might indicate that the Friends House arrangements had been planned before the changes were communicated.

This is a reasonable matter for chronological enquiry.

However, the existence of printed programmes does not independently establish when the programme content was agreed, when printing was ordered, when printing was completed or whether the programme had been revised shortly before the conference.

The investigation should obtain the relevant production records.

These may include dated programme drafts, communications between organisers, print orders, proof approvals and records identifying when the GRH launch was inserted into the conference schedule.

If such documents are unavailable, the organisers should be invited to provide a written explanation.

The purpose is to establish the actual timeline rather than infer intention from the existence of printed material alone.

9.10. The serious suspicion concerning possible deliberate diversion

A serious suspicion has arisen that the Black Cultural Centre may have been used as a misleading or diversionary advertised venue.

This concern must be recorded without dilution.

The possibility is important because the use of a Black cultural institution in a reparations-related announcement can carry significant implications for community dignity, confidence and historical respect.

If such an institution were knowingly used to create a false impression concerning an important reparations event, affected community members could reasonably regard that conduct as deeply insulting.

The possibility of such an insult warrants examination.

However, **the investigation has not established that the venue was deliberately used as a dummy, distraction or instrument of deception**.

No finding of deliberate misrepresentation has been reached against Charmaine Simpson, Kwesi Ochosi, Black History Studies, Building Trust Consortium or any other participant.

The allegation-free investigative question remains whether the documentary chronology establishes that the advertised arrangements were genuine, subsequently altered, separately planned or knowingly misleading.

Each possibility must be examined fairly.

9.11. The significance of obtaining the Black Cultural Centre's own account

The management or responsible organisation of the Black Cultural Centre may possess evidence unavailable from the GRH organisers.

This may include booking correspondence, venue enquiries, provisional reservations, contractual arrangements, cancellation notices and records of who was authorised to use the Centre's name in publicity.

Such evidence may be decisive in clarifying the suspicion.

A response from the Centre could confirm that a genuine booking existed.

It could establish that only preliminary discussions had occurred.

It could identify a cancellation or change of arrangements.

Alternatively, it might establish that the Centre had no knowledge of the advertised event.

No such conclusion should be selected in advance.

The Black Cultural Centre should be approached through its own verified management channels, as part of the separate enquiry concerning that institution.

Project Spire should not be presumed responsible for those venue arrangements.

9.12. Responsibilities of Black History Studies

Black History Studies appeared in the Eventbrite organiser information associated with the original launch advertisement.

Charmaine Simpson was separately identified in the official conference agenda as CEO of Black History Studies.

These records provide grounds for asking about the organisation's responsibilities in the launch arrangements.

However, naming an organisation as an event organiser does not identify every individual who made planning decisions.

The investigation must therefore establish whether Black History Studies created or managed the Eventbrite listing, authorised the publicity, communicated with the advertised venue or issued the subsequent change notification.

It should also establish whether any other organisation shared those responsibilities.

These matters require direct documentary clarification.

The investigation must not assume that every act undertaken by Black History Studies was undertaken by Charmaine Simpson personally.

Nor should the organisation's participation in the GRH launch be treated as an act of the Church Commissioners without evidence.

9.13. Responsibilities of Building Trust Consortium

Building Trust Consortium was identified in event publicity associated with the GRH launch.

Kwesi Ochosi was publicly identified as its founder and as chair of the conference launch session.

These are documented associations.

However, the organisation's exact legal identity, its role in the formation of the GRH and its responsibilities concerning venue arrangements remain to be established.

The investigation should determine whether Building Trust Consortium formally hosted, sponsored, financed or administered the launch.

It should identify who authorised the public description of its role.

It should also establish which organisation was responsible for handling enquiries, complaints, registration, invitations and any subsequent correspondence.

These questions are necessary because responsibility for an event cannot be established solely from a person's public prominence.

9.14. Responsibilities of the conference organisers

The official UK Reparations Conference programme included the afternoon GRH launch.

This creates a legitimate question concerning the conference's programme approval and scheduling processes.

The investigation should establish who requested the inclusion of the GRH session, who approved the request and when the relevant arrangements were confirmed.

It should also identify who supplied the programme description, participant names and session details.

These questions do not suggest that the conference organisers were responsible for the original Black Cultural Centre advertisement.

They seek to establish the point at which the GRH launch became part of the conference's formally advertised programme.

That information is directly relevant to the venue chronology.

The conference programme may also help identify which institution or individual was responsible for communicating later changes to participants.

9.15. The Quakers and Friends House

Friends House was the conference venue.

Rita Remi-Judah, identified as Co-Clerk of the Quakers Reparations Working Group, appeared in the published programme both in the conference welcome and as a participant in the GRH launch.

This provides evidence of Quaker participation in the conference and its programme.

However, holding an event at Friends House does not automatically establish that the Quakers created or governed the GRH.

Similarly, participation by a member of a Quaker working group does not itself establish institutional responsibility for the separately advertised Black Cultural Centre event.

The investigation should identify the relevant conference organiser and the person authorised to answer programme-planning questions.

Any enquiry to the Quakers should be limited to matters within their knowledge or responsibility.

9.16. The programme's overlapping sessions and practical organisation

The official conference programme contains an additional detail requiring careful examination.

It records a lunch period from 13:10 to 15:10, second breakout sessions from 13:20 to 14:25, third breakout sessions commencing at 14:10 and the GRH launch beginning at 14:25.

The GRH launch was therefore scheduled within a programme containing overlapping activities.

Such overlap may be normal at a multi-room conference.

It does not itself establish organisational failure.

However, it makes practical information concerning room allocation, participant movement, publicity and access to the launch particularly relevant.

The organisers should be asked whether delegates received clear instructions about the launch's time, room and availability.

The investigation should also seek confirmation of the actual start and finish times.

This is important when assessing Empress Judah's account of questions being curtailed near the end of the session.

9.17. Empress Judah's account of the launch proceedings

In her email dated 18 October 2026 at 00:50, Empress Judah described the GRH launch and the concerns raised by participants.

She identified Kwesi Ochosi as appearing to be the principal facilitator.

She reported that another participant wished to question the formation of the GRH but was not permitted to speak because the session was concluding.

She also described an intervention by Judy Richards of Global Afrikan Congress UK.

Her account raises questions concerning the management of public discussion, the allocation of time for questions and the availability of further opportunities to seek clarification.

However, the account represents the recollection and interpretation of a participant.

It must not be treated as a complete transcript without supporting evidence.

The investigation should obtain any available recording, the session timetable and the organisers' explanation.

Where differing accounts exist, those differences should be preserved and assessed.

9.18. The reported exchange involving Charmaine Simpson

Empress Judah reported asking why the Black reparations community had not been consulted before the GRH launch.

She attributed the response "you are being informed now" to Charmaine Simpson.

The distinction between informing and consulting is important.

Informing people about an organisation's existence is not necessarily equivalent to consulting them about its formation or proposed governance.

However, the reported statement alone does not establish the full extent of prior consultation or the precise responsibilities held by Charmaine Simpson.

The investigation should seek verification of the exchange through a recording or other independent evidence.

It should also ask the GRH organisers what consultation took place before the launch.

The purpose is to establish the process rather than infer its adequacy from a single reported statement.

9.19. The reported intervention by Judy Richards

Empress Judah's correspondence refers to Judy Richards of Global Afrikan Congress UK speaking during the GRH launch.

She also identified a Facebook video published through Azaniagem as a potential record of the discussion.

This is an important evidence-recovery lead.

A recording may clarify the questions raised, the responses provided, the sequence of contributions and the circumstances in which the discussion concluded.

The investigation should locate and preserve the original recording, including its publication date, duration and relevant timestamps.

It should not rely exclusively on an extract where a longer recording is available.

The video should be assessed alongside witness accounts and the event programme.

A video may verify visible and audible events, but it may not independently establish the organisers' earlier intentions or planning decisions.

9.20. The central question of prior consultation

One of the most important issues concerns whether longstanding independent Black/Afrikan reparations organisations were consulted before the GRH was formed and launched.

Empress Judah's correspondence identifies several organisations and campaigners whose historical contributions she considers relevant.

The investigation must distinguish between general awareness of an event, receipt of an invitation, participation in a consultation and involvement in the formation of an organisation.

These are different forms of engagement.

The proper documentary questions concern who was approached, when they were approached, how their views were solicited and what influence those views had upon decisions.

It is also necessary to establish whether the GRH intended to represent particular communities, provide a coordinating service, undertake research or exercise some other function.

Different institutional purposes may require different forms of consultation and accountability.

No finding of deliberate exclusion should be made before the relevant records are examined.

9.21. The position of longstanding grassroots reparations organisations

The concerns expressed following the launch must be understood against the history of grassroots reparations campaigning.

Organisations and individuals who have campaigned for reparatory justice over decades may reasonably seek recognition of their work and meaningful opportunities to contribute to new initiatives.

Their concern may relate not simply to being invited to an event but to whether institutional developments are taking place without adequate communication with established campaigners.

Such concerns deserve professional examination.

However, no organisation automatically represents all Black/Afrikan people.

Similarly, the fact that one organisation reports not being consulted does not establish that no consultation took place anywhere.

The investigation must distinguish the experiences of identified organisations from broader claims concerning an entire community.

The appropriate response is to collect evidence, identify consultation criteria and establish the decision-making arrangements.

9.22. The absence of clear institutional contact information

Following the launch, RNL experienced difficulty establishing a verified official correspondence address for the GRH.

On 18 October 2026 at 16:52, RNL circulated a formal request for assistance identifying the organisation's authorised contact details.

The correspondence also requested information concerning the persons responsible for receiving documentary enquiries and answering questions about the organisation.

This difficulty is relevant because accessible institutional contact information is a basic component of transparent public engagement.

However, the absence of a verified address from RNL's records does not necessarily establish that no official address exists.

The investigation must distinguish between information that could not be located and information that demonstrably does not exist.

A formal response identifying an authorised contact would resolve an important practical question.

9.23. Empress Judah's subsequent response

At 17:50 on 18 October 2026, Empress Judah replied to RNL's request for contact details.

She confirmed the Black History Studies contact address already available to RNL.

She stated that she did not possess an email address for Kwesi Ochosi.

She also explained that she had no additional verified institutional GRH contact information beyond material previously circulated.

Her response is useful because it documents the limits of the contact information available to her.

It does not establish that the GRH itself lacks official correspondence arrangements.

Empress Judah also suggested that the wider group agree a shorter report before approaching the organisers.

RNL subsequently reaffirmed its independent policy of preserving comprehensive investigations while providing accessible summaries and briefings.

That correspondence belongs primarily to the separate GRH investigation but remains relevant to the chronology of communication difficulties.

9.24. The distinction between collective consultation and RNL's independent investigation

RNL recognises the potential value of community meetings to discuss concerns, compare evidence and agree collective representations.

Empress Judah proposed a further consultation meeting in February 2027.

Such a meeting may provide an opportunity for participating organisations to develop a common position.

However, the existence of a proposed collective process does not remove RNL's independent authority to investigate.

RNL's permanent documentation policy requires comprehensive reference records, including evidence, historical chronology, institutional responses, corrections and outstanding questions.

An executive summary or shorter briefing may improve accessibility.

It does not replace the complete investigation.

Similarly, the selection of priority questions for a meeting does not require RNL to abandon other relevant investigative questions.

This independence is important to preserving documentary accuracy and ensuring that institutional questions are not lost through arbitrary limitations.

9.25. What the GRH launch establishes concerning Project Spire

The GRH launch is relevant to Project Spire because of documented overlapping involvement by Charmaine Simpson and Kwesi Ochosi.

Published records identify Charmaine Simpson undertaking Church Commissioners research and engagement work relevant to Project Spire.

Other records identify Kwesi Ochosi in Church-related archival activities, including research described in a first-hand account as connected with Project Spire.

Both individuals were identified in the GRH launch programme.

These records provide a substantial factual basis for examining their respective institutional responsibilities.

However, they do not establish that the Church Commissioners organised the GRH launch.

They do not establish that Project Spire supplied funding for the event.

They do not prove that either individual exercised authority over the proposed £100 million fund.

They do not establish responsibility for the original Black Cultural Centre venue arrangements.

The appropriate Project Spire enquiry therefore concerns the boundaries of the relevant roles and whether any formal institutional relationship exists.

9.26. The responsibility of the Church Commissioners to clarify their own institutional arrangements

RNL considers it appropriate to inform the Church Commissioners that concerns have arisen following the GRH launch and that publicly documented relationships warrant clarification.

The purpose is not to demand that the Commissioners answer for every act of a separate organisation.

It is to ask whether the persons identified were acting in an authorised Church Commissioners capacity, whether the Commissioners had any formal relationship with the GRH, and what policies govern relevant external activities.

The Commissioners may be able to confirm that the GRH launch was entirely separate from Project Spire.

Alternatively, they may identify particular collaborative arrangements requiring further explanation.

Either response would help establish the facts.

The request is therefore one of institutional clarification, not a presumption of liability.

9.27. Transparency and competent organisation as instruments of peace

RNL maintains that transparency, high-quality organisation, truthful communication, meaningful consultation and clear accountability are essential safeguards for maintaining peace throughout reparatory justice.

Events concerning reparations involve more than ordinary institutional publicity.

They may affect longstanding expectations of recognition, justice and financial repair.

Confusing arrangements, inadequate communication or unclear responsibilities may contribute to mistrust and resentment.

This risk can be reduced through timely disclosure, accurate public information, accessible organisational contacts and fair opportunities for questioning decisions.

The objective is to address concerns early rather than permit misunderstandings to become entrenched.

This principle applies equally to the GRH, Project Spire and all other reparations initiatives.

9.28. Violence, threats of violence and preventative safeguards

Reparatory justice concerns historical atrocities and potentially substantial financial resources.

RNL considers it appropriate to ask institutions to examine the possibility that serious unresolved disputes may contribute to intimidation, threats of violence or physical confrontation.

This is a preventative concern.

It is not a prediction that violence will occur.

Nor is it an accusation that participants in the GRH launch have threatened violence.

The investigation seeks to establish whether organisations have appropriate procedures for addressing serious grievances, responding to complaints and preventing escalation.

A professional response should focus on dialogue, reliable information, procedural fairness and peaceful resolution.

The reference to violence and threats of violence must not be used to intimidate individuals or pressure them to provide particular answers.

The objective is to maintain peace through competent and accountable organisation.

9.29. The original documents required to resolve the venue questions

The most important outstanding evidence concerns the decisions made before 17 October 2026.

The investigation should seek the original Eventbrite publication record, any amendments and the cancellation history.

It should obtain records identifying who administered the advertisement and authorised the named venue.

It should seek confirmation from the Black Cultural Centre concerning any booking, provisional reservation or other arrangement.

It should obtain the original communication reported by Empress Judah as announcing the change.

It should seek dated conference programme drafts and records showing when the GRH launch was added.

It should ask the relevant organisers whether the afternoon and evening activities were initially intended to be separate.

These documents would enable the investigation to establish the sequence without relying upon speculation.

Where records cannot be supplied, the relevant organisation should provide an explanation of the limitation.

9.30. Questions requiring formal written answers

The following questions arise directly from the documentary record and should be directed to the responsible institutions.

9-Q01. Which legal or organisational body authorised the London GRH launch on 17 October 2026?

9-Q02. Who was responsible for planning and approving the original Black Cultural Centre event?

9-Q03. Was the Black Cultural Centre formally booked, provisionally reserved or otherwise approached?

9-Q04. Who created and controlled the original Eventbrite listing?

9-Q05. When was that listing first published, and what amendments were subsequently made?

9-Q06. Were the Black Cultural Centre and Friends House launches originally intended to be separate events?

9-Q07. Who decided that the GRH launch would take place within the UK Reparations Conference programme?

9-Q08. When was that decision made and incorporated into the programme?

9-Q09. Who authorised and issued the communication concerning the change of venue and time?

9-Q10. What explanation was provided to registered attendees and community organisations?

9-Q11. Which persons or organisations were responsible for consulting established grassroots Black/Afrikan reparations groups before the launch?

9-Q12. What documentary records identify those consulted, the dates of consultation and how their contributions were considered?

9-Q13. What official contact details and complaints procedures existed at the time of the launch?

9-Q14. What were the respective organising responsibilities of Black History Studies and Building Trust Consortium?

9-Q15. In what institutional capacity did Charmaine Simpson and Kwesi Ochosi participate?

9-Q16. Did the Church Commissioners or Project Spire have any formal role in financing, organising, approving or advising upon the GRH launch?

9-Q17. Were any overlapping professional or organisational responsibilities subject to applicable conflict-of-interest procedures?

9-Q18. What arrangements exist for further community consultation, correction of inaccurate information and peaceful resolution of outstanding concerns?

These questions may be prioritised for correspondence, but they should remain part of the full permanent investigation record.

9.31. Preliminary evidential findings

The official UK Reparations Conference programme establishes that a London GRH launch was scheduled for 14:25 on 17 October 2026 at Friends House.

It identifies Kwesi Ochosi as chair and Charmaine Simpson among the participants.

The original Eventbrite advertisement examined earlier in the investigation identified an evening event at the Black Cultural Centre in Islington.

Empress Judah's correspondence reports that the venue and time were subsequently changed.

Her correspondence also establishes that she raised concerns about grassroots consultation and questioned whether the confusing communication arrangements were intentional.

RNL's independent research has identified documented involvement by Charmaine Simpson and Kwesi Ochosi in activities associated with Church Commissioners research and Project Spire-related archival work.

These matters provide legitimate grounds for further institutional enquiry.

However, the presently available evidence does not establish deliberate use of the Black Cultural Centre as a dummy venue, misconduct by named individuals, financial wrongdoing or common governance of the GRH and Project Spire.

Those questions remain open.

9.32. Conclusion: the launch must be examined through evidence rather than assumption

The London Global Reparations Hub launch provides an important part of the factual background to the Project Spire investigation.

The event is documented in the official UK Reparations Conference programme.

The different advertised launch arrangements, subsequent correspondence and concerns about consultation raise legitimate questions concerning organisation, communication and accountability.

The seriousness of those questions is increased by the historical sensitivity of reparations and the importance of maintaining trust among affected communities.

The documentary evidence of overlapping involvement by individuals associated with Church Commissioners research and the GRH launch provides a specific reason for seeking institutional clarification.

However, the evidence must not be extended beyond what it establishes.

The investigation has not concluded that the GRH and Project Spire are controlled by the same organisation, that Project Spire funded the launch, or that the Black Cultural Centre was deliberately used to mislead people.

Those possibilities require documentary examination and an appropriate opportunity for response.

RNL will therefore preserve the original records, identify the responsible decision-makers, seek clarification concerning the venue chronology, examine consultation arrangements and maintain an accurate distinction between facts, attributed accounts, suspicions and findings.

The central conclusion of Section 9 is that the Global Reparations Hub launch generated identifiable concerns concerning communication, consultation and organisational accountability, while the subsequently documented involvement of individuals associated with Project Spire provides a legitimate basis for examining institutional boundaries and safeguards.

The purpose is to establish the facts early, support transparency, protect community dignity, prevent avoidable misunderstanding and promote peaceful, accountable reparatory justice.

SECTION 9 — EVIDENCE REGISTER

Evidence ID	Matter	Status
SPIRE-9-001	GRH launch scheduled at Friends House on 17 October 2026	Official programme
SPIRE-9-002	Kwesi Ochosi named as launch chair	Official programme
SPIRE-9-003	Charmaine Simpson named among launch participants	Official programme
SPIRE-9-004	Original Black Cultural Centre evening launch advertised	Previously identified Eventbrite listing; archival preservation needed
SPIRE-9-005	Black History Studies and Building Trust Consortium named in original event arrangements	Previously identified event listing
SPIRE-9-006	Empress Judah reports discovering the advertisement on 14 October	Attributed correspondence
SPIRE-9-007	Reported communication changing venue and time	Original notification still requires examination
SPIRE-9-008	Printed conference programmes including the GRH launch	Reported by Empress Judah; publication and print chronology unresolved
SPIRE-9-009	Reported questions and exchanges during the launch	Attributed witness account
SPIRE-9-010	Possible video record of launch discussion	Evidence-recovery lead
SPIRE-9-011	Initial Black Cultural Centre booking arrangements	Not established
SPIRE-9-012	Reasons for venue change or cancellation	Not established

SPIRE-9-013	GRH formation and consultation records	Outstanding
SPIRE-9-014	Formal Church Commissioners relationship with GRH launch	Not established
SPIRE-9-015	Overlapping individuals' professional responsibilities	Partly documented; authority requires clarification
SPIRE-9-016	Evidence of deliberate venue deception	Not established

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SOURCES AND INDEPENDENT VERIFICATION

Source 9.1 — UK Reparations Conference 2026 official agenda

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Relevant heading: *London Launch of the Global Reparations Hub*.

Purpose: Verification of scheduled venue, time, chair and named participants.

Source 9.2 — Original Black Cultural Centre GRH advertisement

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

Purpose: Original advertised venue, timing and organiser information.

Status: Previously identified. The live page could not be retrieved during this section's verification; original versions and amendment history remain to be preserved.

Source 9.3 — Building Reparative Futures webinar

https://www.eventbrite.co.uk/e/columbus-day-to-reparations-day-civil-society-led-reparatory-justice-tickets-2002760501573

Purpose: Background to earlier GRH-related event organisation and publicly identified participants.

Source 9.4 — Diocese of Southwark programme, February 2026

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

Relevant page: Printed page 9.

Purpose: Evidence of Charmaine Simpson's Church Commissioners research and engagement role.

Source 9.5 — Lambeth Palace Library archival research account

https://www.memslib.co.uk/post/a-glimpse-into-the-archive-my-placement-at-lambeth-palace-library

Purpose: Documentary research lead concerning archival activity associated with Project Spire and Kwesi Ochosi.

Source 9.6 — Empress Judah's first email

18 October 2026 at 00:50.

Purpose: First-hand account of launch discussions, consultation concerns, original advertised venue and subsequent changes.

Status: Original correspondence preserved in the RNL investigation record.

Source 9.7 — Empress Judah's second email

18 October 2026 at 12:28.

Purpose: Further questions concerning the Black Cultural Centre, conference programme, intentionality, grassroots consultation and Project Spire.

Status: Original correspondence preserved in the RNL investigation record.

Source 9.8 — RNL's formal contact enquiry

18 October 2026 at 16:52.

Purpose: Documentary evidence of efforts to identify verified GRH institutional contacts and responsible representatives.

Source 9.9 — Empress Judah's reply

18 October 2026 at 17:50.

Purpose: Further contact information, clarification of available communications and proposed community process.

Source 9.10 — APPG conference recordings

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

The conference website provides navigation to recordings. The precise GRH session recording and relevant timestamps remain to be established.

END OF SECTION 9 — THE GLOBAL REPARATIONS HUB LAUNCH: PLANNING, ORGANISATION, RESPONSIBILITIES, COMMUNICATIONS AND EVENTS OF 17 OCTOBER 2026

NEXT: SECTION 10 OF 24 — THE BLACK CULTURAL CENTRE QUESTION: ORIGINAL ADVERTISEMENT, VENUE AUTHORITY, CHANGES, PRINTED PROGRAMMES, SUSPECTED DIVERSION AND COMMUNITY DIGNITY.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 10 OF 24

THE BLACK CULTURAL CENTRE QUESTION: ORIGINAL ADVERTISEMENT, VENUE AUTHORITY, CHANGES, PRINTED PROGRAMMES, SUSPECTED DIVERSION AND COMMUNITY DIGNITY

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Original advertised arrangements corroborated; new evidence concerning the Centre's operational arrangements identified; booking authorisation, reasons for cancellation and decision-making chronology remain unresolved.

10.1. Purpose of this section

This section examines the serious questions arising from the original advertisement of the Global Reparations Hub (GRH) launch at the Black Cultural Centre in Islington on Saturday 17 October 2026, the subsequent cancellation of that advertised event, and the appearance of the GRH launch within the programme of the UK Reparations Conference at Friends House, Euston.

These circumstances prompted questions from Empress Judah concerning the clarity, timing and intentions of the arrangements.

One particularly serious suspicion is that the Black Cultural Centre may have been used as a misleading or diversionary advertised venue.

Reparation Nation Limited considers that suspicion sufficiently important to warrant a careful investigation. Its significance should not be dismissed merely because the matter concerns a venue advertisement.

The Black Cultural Centre has an expressly identified cultural and community purpose. Its use in the publicity of a reparations initiative therefore has implications for community dignity, public confidence, organisational accountability and institutional respect.

However, the present investigation has not established that the venue was used deceptively.

The proper question is whether the original records, booking arrangements, correspondence, publication history and explanations of the persons responsible can establish what happened and why.

This section also examines newly identified public information from Islington Council concerning the Centre's management arrangements and Black History Studies' previous involvement in activities there.

That information provides an additional documentary basis for enquiries concerning venue authority.

The section remains part of the Project Spire investigation only because of the documented overlap involving individuals associated with Church Commissioners research and the GRH launch.

The Centre's own management and the GRH's organisational conduct remain distinct subjects of enquiry.

10.2. Why the Black Cultural Centre question is particularly sensitive

A Black Cultural Centre is not simply an interchangeable commercial venue.

Islington Council publicly describes its Black Cultural Centre as a space supporting Black Global Majority communities, learning, cultural participation and community activities.

The Centre therefore has an identified social and cultural purpose.

An event concerning reparatory justice may carry particular significance when publicly associated with such a location.

Reparations concern the historical violence of enslavement, dispossession, institutional responsibility, recognition and the practical delivery of justice.

For individuals and organisations engaged in the reparations movement, the name of a Black cultural institution may communicate a degree of community accessibility or cultural connection.

Such perceptions should not automatically be treated as institutional endorsement.

Nevertheless, they help explain why uncertainty concerning the authority to advertise the Centre can become a serious matter.

If an institution's name were deliberately used without authority to mislead the community, that could reasonably be perceived as disrespectful and damaging to public trust.

The investigation has not established that this occurred.

Its responsibility is to examine the possibility through evidence rather than assumption.

10.3. Identification of the Black Cultural Centre

Islington Council maintains a public information page identifying the Black Cultural Centre at 16–18 Hornsey Road, London, N7 7BT.

The Council describes the Centre's purpose as providing a welcoming place for Black Global Majority communities and supporting activities connected with Black history, culture and empowerment.

Its public information also describes pop-up programmes operated by different organisations.

This is a significant institutional record because it identifies an appropriate public authority from which information concerning the Centre's arrangements may be sought.

However, the Council's public description does not establish the exact identity of the organisation responsible for all operational decisions on 17 October 2026.

Nor does it establish whether individual bookings could be made directly with the Council, a licensed operator or another authorised party.

Those matters require further clarification.

Primary source:

Islington Council — Black Cultural Centre:

https://www.islington.gov.uk/about-the-council/equality-and-diversity/challenging-inequality/black-cultural-centre

10.4. The Centre's published operating arrangements

A second Islington Council publication concerns applications by organisations wishing to run the Black Cultural Centre.

The Council described a proposed operating period from 6 April 2026 to 31 March 2027.

Its published arrangements offered the successful organisation or consortium an opportunity to run the Centre for a twelve-month period, subject to financial and community-benefit conditions.

The Council described an anticipated contribution towards overheads and a nominal rent.

This material establishes that management of the Centre may involve a formal licence or operating arrangement.

That possibility is directly relevant to the GRH launch enquiry.

It means the investigation should establish not only whether the Council approved the advertised event, but also whether an authorised operator had responsibility for venue bookings during October 2026.

A previous operator, proposed operator or pop-up participant should not automatically be treated as the person authorised to accept bookings on a particular date.

Primary source:

Islington Council — Apply to run the Black Cultural Centre:

https://www.islington.gov.uk/about-the-council/equality-and-diversity/challenging-inequality/black-cultural-centre/apply-to-run-the-black-cultural-centre

10.5. New documentary finding concerning Black History Studies

The Islington Council Black Cultural Centre webpage contains a particularly important detail.

Its published programme identifies Black History Studies as a pop-up operator at the Centre for a period ending on 14 August 2026.

This establishes that Black History Studies had an independently documented earlier programme association with the Centre.

That association predates the advertised GRH launch on 17 October 2026.

This is relevant because the original GRH Eventbrite listing identified Black History Studies as its organiser.

The connection supplies a factual reason to enquire whether Black History Studies had previously used the Centre, maintained relationships with its management or held any authority to arrange an event there in October.

However, **an earlier programme ending in August does not establish continuing booking or management authority in October**.

That distinction is essential.

The investigation must determine whether Black History Studies had a separate subsequent booking, a continuing operating arrangement, permission from the relevant management organisation or another legitimate basis for advertising the Centre.

Its earlier association is a documented research lead, not evidence that the October venue arrangement was unauthorised.

10.6. The original Eventbrite advertisement

The original Eventbrite listing was titled *London Launch of the Global Reparations Hub*.

The listing advertised an event on Saturday 17 October 2026 from 6pm to 9pm at the Black Cultural Centre, Islington.

It described the launch as part of the Building Reparative Futures London programme.

It identified Black History Studies as organiser and Building Trust Consortium as host.

Kwesi Ochosi was named as moderator.

The advertised speakers included Charmaine Simpson and other participants subsequently identified in the UK Reparations Conference programme.

The listing presented the GRH as a community-oriented initiative intended to support reparations-related civil society collaboration.

It also advertised a panel discussion and opportunities for questions.

The listing is now marked cancelled.

These details are sufficiently specific to establish that the venue was publicly advertised in connection with the event.

They do not establish the underlying booking agreement or the reason for cancellation.

Original listing:

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

The page's indexed content provides documentary support for the advertised details. The live page and original amendment history must be preserved separately wherever obtainable.

10.7. The importance of the cancellation status

The Eventbrite listing's cancellation status is a documented part of the public record.

However, cancellation can result from several different circumstances.

An event may be cancelled because another venue became preferable, a booking could not be confirmed, organisational arrangements changed, an event was consolidated with another programme or other unforeseen difficulties arose.

The cancellation status does not specify which explanation applies in this case.

Nor does it establish whether the proposed event was genuinely booked before the cancellation.

The investigation should therefore request the cancellation date, the explanation entered by the organiser, any notification sent to registered attendees and the original administrative record.

The precise sequence may establish whether the afternoon Friends House launch replaced the original event or was already being planned as a separate activity.

It may also identify whether adequate notice was given to people who intended to attend at the Black Cultural Centre.

10.8. A material discrepancy in the advertised address

The indexed Eventbrite listing contains an additional detail requiring clarification.

The event description identifies the Black Cultural Centre at 16 Hornsey Road with postcode N7 7BP, while the structured venue information identifies 16–18 Hornsey Road with postcode N7 7BT.

Islington Council's public address is 16–18 Hornsey Road, London, N7 7BT.

This discrepancy should be recorded accurately.

It may reflect an ordinary address-entry error or differences in how the venue was represented within the advertising system.

It does not, by itself, establish that the event was fictitious or that anyone intended to mislead attendees.

Nevertheless, the discrepancy is relevant to the accuracy of public communications.

The investigation should establish who supplied the venue address, whether any correction was issued and whether attendees experienced practical difficulties as a result.

10.9. Independent reproduction of the original advertisement

A separate public events website reproduced the Black Cultural Centre launch listing, identifying the event as taking place at the Islington venue on 17 October 2026.

This provides additional support for the fact that the advertised arrangements circulated beyond Eventbrite.

However, a reproduced listing may obtain its information directly from the original advertisement.

It should therefore not be treated as a wholly independent confirmation that a booking existed.

Its evidential value concerns public dissemination of the advertised venue and time.

The investigation should preserve the reproduced listing alongside the original Eventbrite record.

Additional source:

What's Going On London — London Launch of the Global Reparations Hub:

https://whatsgoingon.london/events/s/7a8913fd

10.10. Empress Judah's discovery and circulation of the advertisement

In her correspondence of 18 October 2026, Empress Judah stated that she discovered the advertised Black Cultural Centre launch on 14 October.

She reported circulating the information to various grassroots reparations organisations and individuals.

This is important because it establishes that the advertised arrangements were relied upon sufficiently for information about them to be circulated to others.

The investigation should distinguish between what she personally observed and what other recipients subsequently did.

The available correspondence does not establish how many people planned to attend at the Centre or whether anyone travelled there in reliance upon the advertisement.

Such evidence could become relevant to evaluating the practical consequences of the communications.

However, inconvenience or confusion should not be invented where it has not been demonstrated.

The proper approach is to seek accounts from people who registered, circulated the invitation or attempted to attend.

10.11. The reported communication changing the arrangements

Empress Judah stated that Charmaine Simpson subsequently circulated a communication concerning a change of venue and time.

The revised arrangement placed the GRH launch at Friends House as part of the UK Reparations Conference.

The original message is an important outstanding document.

Its wording may clarify whether the organisers understood the change as a relocation, replacement, consolidation or cancellation.

The message may also establish when the change was communicated and who was included in the notification.

The investigation should obtain the original email with its date and message headers.

It should identify whether registered Eventbrite attendees also received a direct cancellation or relocation notification.

These questions relate to the completeness and accuracy of event communications.

They do not establish deliberate deception.

10.12. The afternoon launch at Friends House

The official UK Reparations Conference programme records the GRH launch at 14:25 on Saturday 17 October 2026.

It identifies Kwesi Ochosi as chair and names Charmaine Simpson among the participants.

This programme therefore supplies a separate public record of the afternoon arrangements.

The existence of the afternoon launch within the published conference programme is not dependent upon the original Eventbrite advertisement.

However, the programme does not disclose when the organisers first decided to include the launch.

That date is important to the questions raised by Empress Judah.

The investigation should distinguish the programme's publication date, the date printing was commissioned, the date the final proof was approved and the date the GRH launch was added.

A programme may be prepared and revised over several stages.

It would therefore be improper to infer a complete planning chronology merely from the existence of printed copies on the conference day.

Official source:

UK Reparations Conference 2026 — Agenda:

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

10.13. Empress Judah's concern about the printed programme

In her email of 18 October 2026 at 12:28, Empress Judah questioned how the Friends House conference programme could already contain the GRH launch when the Black Cultural Centre had been publicly advertised.

Her concern raised the possibility that the Friends House arrangement had been planned significantly earlier than some community participants understood.

This is a serious chronological question.

However, it is not yet a verified finding about intentional conduct.

The existence of printed programmes is compatible with more than one explanation.

The launch could have been inserted into the programme before the Eventbrite listing was created.

The programme could have been revised shortly before printing.

Two events could initially have been planned, with one subsequently cancelled.

Other explanations may emerge from the documentary record.

The investigation must obtain the programme production history before selecting an explanation.

10.14. The question of original intention

The decisive question is not simply whether two different venues appeared in public advertisements.

It is what the organisers intended when those advertisements were published.

Intentions cannot reliably be established by selecting one interpretation of incomplete information.

They must be examined through contemporaneous records, communications and subsequent explanations.

Relevant material includes booking enquiries, planning correspondence, meeting notes, programme drafts, event-platform records, notification emails and cancellation reasons.

Where the original records are inconsistent, the persons responsible should be invited to explain the inconsistency.

Where records support an ordinary administrative explanation, that should be stated.

Where records disclose a materially misleading decision, the evidence should be identified and assessed.

At present, the investigation does not possess sufficient evidence to determine intent.

10.15. The serious suspicion of a deliberate diversion

RNL preserves the seriousness of the suspicion that the Black Cultural Centre may have been deliberately presented as the launch venue when the organisers intended the substantive launch to occur elsewhere.

If that suspicion were substantiated, the implications could extend beyond a routine communication failure.

The use of a culturally significant institution as a misleading venue could undermine community trust and raise questions about respect for people who relied upon the announcement.

It could also raise questions about the integrity of consultation and event organisation.

However, the investigation has not established that such a decision was made.

Nor has it identified evidence sufficient to attribute deliberate deception to Charmaine Simpson, Kwesi Ochosi, Black History Studies, Building Trust Consortium, the conference organisers or Islington Council.

The suspicion must therefore remain an open investigative proposition.

It should be examined rigorously, not dismissed or converted prematurely into a finding.

10.16. An equally important possibility: genuine but poorly communicated arrangements

A different possibility is that the original event was genuinely intended to take place at the Black Cultural Centre and was subsequently moved or cancelled for legitimate reasons.

Such reasons might include venue availability, programme consolidation, speaker arrangements or organisational practicalities.

These possibilities should not be treated as established facts either.

They are alternative explanations that a fair investigation must remain willing to consider.

Even where an event was genuinely planned, communication may still have been inadequate.

A genuine change can cause confusion if notifications are delayed, incomplete or inconsistent.

The investigation should therefore distinguish the legitimacy of the underlying decision from the quality of the communication process.

An absence of deliberate deception would not necessarily establish that the arrangements were competently administered.

Conversely, evidence of confusion would not itself prove deception.

10.17. The relationship between Black History Studies and the Centre

The documented earlier association between Black History Studies and the Black Cultural Centre makes the question of booking authority more precise.

Islington Council's website identifies Black History Studies as a previous pop-up operator.

The GRH Eventbrite listing identifies Black History Studies as organiser.

The investigation should therefore establish whether the earlier operational relationship contributed to the October event arrangements.

Relevant questions include whether Black History Studies maintained a relationship with the Centre after August, whether it obtained permission for the October event and who was authorised to accept or confirm a booking.

A previously documented relationship may make a proposed booking plausible.

It does not establish that a booking was made.

It also does not establish that Black History Studies possessed continuing control of the Centre.

The distinction is essential to avoiding unsupported conclusions about either proper authorisation or improper use.

10.18. The identity of the October 2026 venue operator

Islington Council's published arrangements identify the possibility of a licensed organisation running the Black Cultural Centre for the period including October 2026.

The investigation must establish which organisation, if any, held that responsibility on 17 October.

This is a material question because an authorised operator may control reservations, venue access and event agreements.

The Council may retain other responsibilities relating to the premises.

The investigation should identify the respective responsibilities of the Council and any licensed operator.

If the Centre was managed through several arrangements, those arrangements should be explained.

This information may resolve who had authority to approve an evening event.

The investigation should not assume that the Council's general public support for the Centre means that the Council directly handled every booking.

10.19. The possibility of unauthorised use of the Centre's name

One question requiring examination is whether the Black Cultural Centre's name appeared in the event advertisement with appropriate authorisation.

The presence of an address in an Eventbrite listing does not automatically prove such authorisation.

Equally, the absence of a publicly available booking confirmation does not prove that permission was lacking.

The enquiry should therefore ask the responsible management whether an authorised booking, provisional reservation or other arrangement existed.

If a booking was made, the investigation should establish when and by whom it was requested.

If no booking existed, the organisers should be invited to explain why the venue was advertised.

This approach permits clear factual conclusions without presuming misconduct.

10.20. Community dignity and the possible significance of misuse

The concern about the Black Cultural Centre is not adequately addressed merely by describing the events as a potential scheduling disagreement.

The Centre has an identified purpose involving Black cultural recognition, community activity and empowerment.

For community members engaged in reparatory justice, that cultural purpose may carry substantial meaning.

If an institution associated with Black community development were knowingly used as an unauthorised or misleading symbol, the consequences could include a perception of disrespect and loss of confidence.

The possibility of such an outcome deserves serious consideration.

However, perceptions of disrespect and evidence of intentional disrespect are different matters.

RNL will examine both the factual arrangements and the reported community impact.

The investigation will not presume that cultural harm occurred in a particular form without supporting accounts and evidence.

10.21. The relevance to Project Spire

The Black Cultural Centre question arises primarily from the GRH launch arrangements.

Its relationship with Project Spire is indirect and must remain clearly defined.

Published records establish Charmaine Simpson's involvement in Church Commissioners research and engagement work relevant to Project Spire.

Other records identify Kwesi Ochosi in Church-related archival research activities.

Both individuals were involved in GRH-related events.

The investigation therefore seeks clarification concerning the institutional capacities in which they participated.

However, the present evidence does not establish that the Church Commissioners selected the Black Cultural Centre, approved the advertisement, controlled the venue arrangements or ordered the cancellation.

The Church Commissioners should only be asked to address the extent of their own involvement or the responsibilities of persons acting on their behalf.

Questions about the Centre's bookings should be directed to its authorised management and the GRH event organisers.

10.22. The importance of identifying the correct respondents

A professional investigation should direct each question to the organisation most likely to possess the relevant evidence.

Islington Council can be asked about the Centre's management arrangements, licensing framework and any records within its responsibility.

The authorised Centre operator can be asked about venue enquiries, bookings, approvals and cancellations.

Black History Studies can be asked about its role in publishing or organising the event.

Building Trust Consortium can be asked about its advertised hosting responsibilities.

The UK Reparations Conference organisers can be asked about the Friends House programme and its preparation.

Charmaine Simpson and Kwesi Ochosi can be invited to clarify their respective responsibilities.

The Church Commissioners can be asked whether Project Spire had any formal involvement.

This allocation prevents one organisation from being held responsible for records or decisions that may belong to another.

10.23. The documentary preservation requirements

The investigation should preserve the original Eventbrite listing, indexed copies, cancellation notices, screenshots and related communications.

Where the page contains different address descriptions, both versions should be retained.

The official conference programme should be preserved in the version available on the conference date, where obtainable.

Any subsequent amendments should be documented separately.

The original notification of changed arrangements should be retained with full headers and dates.

Correspondence from Empress Judah should remain in its original form.

Responses from the Centre, Council and organisers should be added without overwriting earlier material.

The evidence library should identify document source, date, custodian, retrieval date and any limitations.

Where records are unavailable, the absence should be documented without assuming that they were deliberately withheld.

10.24. The need for a fair right of reply

The seriousness of the suspicion requires a correspondingly careful right-of-reply procedure.

The organisations and individuals involved should be told what documentary facts have been identified and which specific questions remain unresolved.

They should be given an opportunity to explain the sequence, provide original records and correct misunderstandings.

Their responses should be reproduced accurately.

Where a response is supported by documents, those documents should be evaluated.

Where a response does not address a material question, the question should remain open.

No person should be treated as responsible merely because they have not yet responded.

The purpose of the procedure is to establish facts rather than to create pressure for an admission or predetermined conclusion.

10.25. Transparency and professional organisation

The Black Cultural Centre question illustrates why transparent organisation is essential to reparatory justice.

A public event should identify its authorised organiser, venue, time and contact arrangements.

Where changes occur, accurate notifications should be issued promptly.

Where an event is cancelled, registrants should be provided with clear information.

Where different institutions are involved, their responsibilities should be understandable.

These are basic standards of administration.

Their importance increases when events concern historically sensitive subjects and the establishment of institutions claiming a reparatory purpose.

RNL considers that transparent organisation can reduce confusion, misunderstanding and avoidable grievances.

This principle applies whether the investigation ultimately identifies a serious failure, an ordinary error or a fully legitimate explanation.

10.26. Violence and threats of violence: the preventative dimension

RNL maintains its universal principle that transparent organisation and accountable decision-making are foundations for peace.

Reparatory justice involves profound historical grief, contested responsibilities and potentially significant financial resources.

Confusion or perceived disrespect may contribute to community frustration.

The possibility of escalation into intimidation, threats of violence or physical violence must therefore be considered as a preventative institutional concern.

This does not mean that violence is expected or inevitable.

It does not imply that any person involved in the GRH launch has threatened violence.

The investigation does not attribute violent intentions to those expressing concerns.

Its approach is to reduce the possibility of conflict through early clarification, accessible communication, fair procedures and lawful, peaceful resolution.

The prospect of violence must never be used as a means of threatening or pressuring respondents.

10.27. Evidence required from Islington Council

RNL should request written clarification from Islington Council concerning the management of the Black Cultural Centre during October 2026.

The enquiry should identify whether a licensed operator held responsibility for the Centre and what authority that operator possessed.

It should ask whether the Council retains booking records or whether those records are held by the operator.

It should also establish what arrangements existed for authorising external organisations to advertise events at the Centre.

The Council should be asked whether its records show any relevant booking or enquiry concerning the GRH launch.

If the information is held elsewhere, the Council should identify the appropriate responsible organisation where possible.

These questions concern administrative records and institutional responsibilities.

They do not assume that the Council was involved in any improper conduct.

10.28. Evidence required from Black History Studies and Building Trust Consortium

Black History Studies and Building Trust Consortium should be asked to clarify their respective responsibilities for the advertised event.

The original Eventbrite listing identifies them in organising and hosting capacities.

The investigation should establish which organisation created the advertisement and which had authority to approve the venue.

It should seek the original booking correspondence, cancellation explanation and notification records.

It should also ask whether the Friends House launch was intended to replace the Black Cultural Centre event or operate separately.

Where decisions were made jointly, the responsible persons and dates should be identified.

The purpose is to establish the decision-making chronology and preserve an accurate record.

10.29. Evidence required from the conference organisers

The UK Reparations Conference organisers should be asked when the GRH launch was first proposed for inclusion in the conference.

They should identify the date it was approved and the date the programme was finalised.

Where printed programmes were produced, the relevant production schedule may clarify whether the launch was incorporated shortly before the conference.

The organisers should also identify who supplied the names and session description.

If changes occurred, the dates and reasons should be explained.

These records may directly address Empress Judah's question concerning the printed programmes.

However, the conference organisers should not automatically be presumed responsible for the original Eventbrite advertisement unless evidence establishes their involvement.

10.30. A structured examination of possible explanations

The investigation should examine the available evidence against several competing explanations.

The original Black Cultural Centre launch may have been genuinely arranged and subsequently cancelled.

The organisers may have decided to consolidate two events.

The Centre may have been provisionally identified before a booking was finalised.

A communication or administrative error may have caused confusion.

There may have been circumstances involving permissions, availability or other practical matters.

The more serious suspicion is that the venue may have been deliberately advertised in a misleading way.

These possibilities should not be treated as equally likely merely because they can be imagined.

They must be assessed according to the strength of supporting evidence.

The investigation should exclude explanations only where reliable records justify doing so.

10.31. Priority questions requiring written answers

Question 10.1: Which organisation had operational responsibility for the Black Cultural Centre on 17 October 2026?

Question 10.2: Did Islington Council or an authorised operator approve the GRH launch for that date?

Question 10.3: Was a confirmed, provisional or proposed booking made?

Question 10.4: Who submitted the booking enquiry, and when?

Question 10.5: Did Black History Studies retain any operating or booking authority following its published pop-up period ending in August 2026?

Question 10.6: Who created and published the original Eventbrite advertisement?

Question 10.7: Why did the event description and structured venue information contain different postcode details?

Question 10.8: When was the advertisement first published?

Question 10.9: What amendments were made, by whom and on what dates?

Question 10.10: When was the event marked cancelled, and what reason was recorded?

Question 10.11: Were registered attendees informed of the cancellation or change, and when?

Question 10.12: Were the Black Cultural Centre and Friends House launches originally intended as separate events?

Question 10.13: Who authorised the decision to hold the launch at Friends House?

Question 10.14: When was the GRH launch incorporated into the conference programme?

Question 10.15: When were the printed conference programmes finalised and printed?

Question 10.16: What explanation was given to Empress Judah and other people who had received the original advertisement?

Question 10.17: Did the Black Cultural Centre's management know that its name and address appeared in the Eventbrite advertisement?

Question 10.18: What documentary evidence explains the difference between the advertised arrangements?

Question 10.19: Did Project Spire or the Church Commissioners exercise any formal authority over the venue or launch decisions?

Question 10.20: What steps will the responsible organisations take to correct any inaccurate information and address substantiated community concerns?

These questions are intended for evidence gathering and institutional clarification.

They should not be presented as allegations or demands for a predetermined finding.

10.32. Preliminary findings

The investigation has established that an Eventbrite advertisement publicly identified the Black Cultural Centre in Islington as the venue for an evening GRH launch on 17 October 2026.

The advertisement identified Black History Studies as organiser, Building Trust Consortium as host and Kwesi Ochosi as moderator.

The listing was subsequently marked cancelled.

The official UK Reparations Conference programme separately identified an afternoon GRH launch at Friends House.

Empress Judah's correspondence reported that the event arrangements were changed and questioned the chronology of the published programmes.

A further documentary discovery identifies Islington Council's operating arrangements for the Black Cultural Centre and a previous Black History Studies pop-up period ending in August 2026.

These records establish additional matters requiring investigation concerning venue authority and organisational responsibility.

However, the present evidence does not establish that the Black Cultural Centre was never genuinely intended to host the event.

It does not establish that the Centre's name was used without authorisation.

It does not establish deliberate deception.

It does not establish that Project Spire or the Church Commissioners controlled the arrangements.

These questions remain unresolved.

10.33. Conclusion: a serious question requiring documentary resolution

The Black Cultural Centre question is a significant component of the historical circumstances surrounding the Global Reparations Hub launch.

The original advertisement, subsequent cancellation, official conference programme and contemporaneous correspondence provide a sufficient documentary basis for further investigation.

The newly identified Islington Council records improve the investigation by identifying the Centre's institutional purpose, management framework and a previous operational association with Black History Studies.

That information enables more precise questions concerning booking authority and responsibility.

The suspicion that the Centre may have been used as a misleading or diversionary venue must be taken seriously because of its possible implications for community dignity and confidence.

However, the investigation has not established that such conduct occurred.

RNL will therefore seek the original records and explanations from the persons and institutions responsible.

It will distinguish mistakes from deliberate decisions, documented relationships from inferred associations and community concerns from proven findings.

The objective is to ensure that the investigation remains capable of discovering an innocent explanation, an organisational failure or a more serious problem, according to the evidence obtained.

The central conclusion of Section 10 is that the Black Cultural Centre venue question has a concrete documentary foundation, including new official information concerning the Centre's operating arrangements. The original booking authority, cancellation reasons and planning chronology remain unresolved and require direct institutional clarification.

The investigation will continue independently and professionally, preserving the original evidence, protecting community dignity, maintaining a fair right of reply and promoting transparent, peaceful and accountable reparatory justice.

SECTION 10 — EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-10-001	Islington Council identifies the Black Cultural Centre at 16–18 Hornsey Road	Official council publication
SPIRE-10-002	Council describes the Centre's cultural and community purpose	Official council publication
SPIRE-10-003	Council published an application process for a 2026–27 Centre operator	Official council publication

SPIRE-10-004	Council identifies a Black History Studies pop-up period ending 14 August 2026	Official council publication
SPIRE-10-005	Eventbrite advertised an evening GRH launch at the Centre on 17 October 2026	Indexed original event listing
SPIRE-10-006	Black History Studies identified as organiser	Eventbrite listing
SPIRE-10-007	Building Trust Consortium identified as host	Eventbrite listing
SPIRE-10-008	Kwesi Ochosi identified as moderator	Eventbrite listing
SPIRE-10-009	Eventbrite listing marked cancelled	Indexed event status
SPIRE-10-010	Different postcode details in Eventbrite's descriptive and location fields	Documentary discrepancy
SPIRE-10-011	Independent website reproduced the original venue advertisement	Secondary event listing
SPIRE-10-012	Conference programme scheduled GRH launch at Friends House at 14:25	Official conference agenda
SPIRE-10-013	Empress Judah reports discovering the original advertisement on 14 October	Attributed correspondence
SPIRE-10-014	Empress Judah reports later notification of changed arrangements	Attributed correspondence; original notification requires examination
SPIRE-10-015	Exact October 2026 Centre operator	Not established
SPIRE-10-016	Confirmed booking or venue authorisation	Not established
SPIRE-10-017	Original Eventbrite publication and amendment history	Outstanding

SPIRE-10-018	Conference programme printing and approval chronology	Outstanding
SPIRE-10-019	Deliberate diversion or deception	Not established
SPIRE-10-020	Formal Project Spire responsibility for the venue arrangements	Not established

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SOURCES AND INDEPENDENT VERIFICATION

Source 10.1 — Islington Council: Black Cultural Centre

https://www.islington.gov.uk/about-the-council/equality-and-diversity/challenging-inequality/black-cultural-centre

Evidence: Official venue address, purpose and published pop-up programme, including Black History Studies' earlier operating period.

Source 10.2 — Islington Council: Apply to Run the Black Cultural Centre

https://www.islington.gov.uk/about-the-council/equality-and-diversity/challenging-inequality/black-cultural-centre/apply-to-run-the-black-cultural-centre

Evidence: Published management application framework for 6 April 2026 to 31 March 2027.

Source 10.3 — Eventbrite: London Launch of the Global Reparations Hub

https://www.eventbrite.co.uk/e/london-launch-of-the-global-reparations-hub-tickets-2002762834551

Evidence: Original event title, Black Cultural Centre venue, advertised time, organiser, host, moderator, address descriptions and cancellation status.

Source 10.4 — What's Going On London

https://whatsgoingon.london/events/s/7a8913fd

Evidence: Secondary reproduction of the Black Cultural Centre launch advertisement.

Source 10.5 — UK Reparations Conference 2026 Agenda

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Evidence: Afternoon GRH launch at Friends House, 14:25, with named participants.

Source 10.6 — Empress Judah correspondence

Emails dated 18 October 2026 at 00:50, 12:28 and 17:50.

Evidence: Discovery of advertisement, reported change notification, programme concerns, suspicion of possible deliberate diversion and subsequent enquiries.

Status: Original correspondence preserved within the RNL investigation record.

Source 10.7 — Original notification of changed arrangements

Reported communication from Charmaine Simpson concerning the launch venue and time.

Status: To be isolated and examined in its original form, including date, headers, recipients and complete explanation.

Source 10.8 — Islington Council correspondence

The Council identifies a public contact channel for Black Cultural Centre matters:

partnerships@islington.gov.uk

Purpose: Future formal enquiries concerning venue management and booking authority. No response has yet been established in this investigation.

END OF SECTION 10 — THE BLACK CULTURAL CENTRE QUESTION: ORIGINAL ADVERTISEMENT, VENUE AUTHORITY, CHANGES, PRINTED PROGRAMMES, SUSPECTED DIVERSION AND COMMUNITY DIGNITY

NEXT: SECTION 11 OF 24 — PROJECT SPIRE'S ORIGINAL PURPOSE, HISTORICAL ENSLAVEMENT CONNECTIONS, INSTITUTIONAL RESPONSIBILITY AND THE DEVELOPMENT OF ITS REPARATORY JUSTICE PROGRAMME.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 11 OF 24

PROJECT SPIRE'S ORIGINAL PURPOSE, HISTORICAL ENSLAVEMENT CONNECTIONS, INSTITUTIONAL RESPONSIBILITY AND THE DEVELOPMENT OF ITS REPARATORY JUSTICE PROGRAMME

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Historical findings and institutional commitments documented; questions concerning financial valuation, governance, implementation, delivery and adequacy remain under investigation.

11.1. Purpose of this section

This section examines the historical evidence and institutional decisions that led the Church Commissioners for England to develop Project Spire and the proposed Fund for Healing, Repair and Justice.

Unlike the preceding sections, which examined overlapping professional involvement and the circumstances surrounding the Global Reparations Hub launch, this section returns to the central institution and purpose of Project Spire itself.

It investigates why the Church Commissioners commissioned historical research, what that research established, how the Commissioners acknowledged their predecessor fund's involvement in African chattel enslavement, and how the subsequent reparatory programme developed.

The objective is to distinguish the original historical wrongs, their documented financial consequences, the Commissioners' institutional response and the reparatory outcomes that have actually been achieved.

These distinctions are fundamental.

Research is not reparations delivery.

Acknowledgement is not compensation.

A financial commitment is not a completed transfer.

An investment intended to produce future benefits is not necessarily a payment to an identifiable affected person or community.

The investigation must preserve these differences while fairly recognising actions the Church Commissioners have already undertaken.

11.2. The institution responsible for Project Spire

The Church Commissioners for England are responsible for managing a substantial endowment intended to support the mission and ministry of the Church of England.

The institution was formed in 1948 through the merger of Queen Anne's Bounty and the Ecclesiastical Commissioners.

The present endowment therefore incorporates assets inherited from predecessor institutions with much longer histories.

That historical continuity is central to Project Spire.

The investigation does not concern only the personal actions or beliefs of present-day Church officials.

It concerns the origins and movement of institutional wealth across generations.

The relevant question is how an institution should address historical financial connections that its own research has identified.

The Church Commissioners have publicly acknowledged those connections and stated their intention to respond.

RNL must examine that response as an institutional programme, not as a substitute for the responsibilities of individual perpetrators of historical enslavement.

11.3. Queen Anne's Bounty: the historical predecessor

Queen Anne's Bounty was established in 1704.

Its purpose included supplementing the incomes of poorer Church of England clergy.

It acquired, invested and administered funds over a long period.

The importance of Queen Anne's Bounty to Project Spire lies in the historical origins of part of the wealth subsequently inherited by the Church Commissioners.

In 2019, the Commissioners initiated research into the origins of their endowment and possible connections with transatlantic chattel enslavement.

That research examined early financial ledgers, investment records and historical documents.

The findings identified links between Queen Anne's Bounty and economic activities connected with the enslavement and exploitation of African people.

The historical records therefore supplied a documentary basis for institutional examination.

This is not merely a contemporary interpretation arising from public controversy.

It is a finding published and acknowledged by the Church Commissioners themselves.

11.4. African chattel enslavement and institutional wealth

African chattel enslavement involved the treatment of human beings as property, including their purchase, sale, forced labour and hereditary enslavement.

The system generated wealth through multiple connected economic activities.

These included trafficking, plantation production, trade, financing, insurance, investment and the operation of colonial institutions.

Financial institutions could become connected to enslavement without directly operating plantations or transporting enslaved people.

Such connections might arise through investments, securities, donations, commercial relationships or the receipt of income generated from slavery-related activities.

The distinction matters because Project Spire concerns financial connections identified within the historical records of Queen Anne's Bounty.

It does not require the Church Commissioners to have been the direct operator of every historical activity from which relevant wealth arose.

The proper investigative question is what the historical documents establish about the source, nature, movement and eventual institutional inheritance of that wealth.

11.5. The South Sea Company connection

One of the most important findings concerns Queen Anne's Bounty's investment in the South Sea Company.

The Church Commissioners' published research identifies the South Sea Company as an enterprise involved in trafficking and trading enslaved African people.

Queen Anne's Bounty held investments in South Sea Company securities and received income associated with those investments.

This constitutes a documented financial connection between the predecessor fund and an enterprise engaged in transatlantic chattel enslavement.

The significance is substantial.

The historical connection was not limited to cultural attitudes or theological associations.

It involved identifiable financial assets and investment income.

The investigation should therefore examine the original records establishing when investments were made, their value, the income received, the circumstances of disposal and the subsequent treatment of the proceeds.

The complete accounting cannot be reconstructed merely from a general acknowledgement of investment.

It requires examination of the research report and the original financial evidence.

11.6. Benefactions and donations associated with enslavement

The Church Commissioners' research also identifies benefactions received by Queen Anne's Bounty.

Some donations were associated with individuals connected to transatlantic enslavement or the plantation economy.

The Commissioners' published information identifies Edward Colston among the benefactors whose giving included Queen Anne's Bounty.

This creates a separate category of historical financial connection.

An institution may receive wealth associated with enslavement through donations as well as through investment activity.

The evidential position must be stated carefully.

Where a donation's source is demonstrably linked to enslaved labour or related economic activity, that connection should be identified.

Where the source is suspected or considered likely but not conclusively established, the uncertainty must be preserved.

It would be improper to treat every historical benefaction as proven slavery-derived wealth without examining the relevant records.

Equally, documented benefactions associated with enslavement should not be disregarded because their precise financial origins require further historical analysis.

11.7. The use of Queen Anne's Bounty funds

Queen Anne's Bounty used its resources to support poorer clergy.

According to the Church Commissioners' own account, this included acquiring land that generated income and providing annuity payments.

This is relevant because it illustrates how funds received or invested by the predecessor institution could become part of continuing institutional financial activity.

The movement of wealth through subsequent transactions may make its historical origins less visible.

However, a change in the form of an asset does not automatically erase the historical question of how the original wealth was acquired.

The investigation should therefore examine the extent to which historical research has traced particular funds through reinvestment, land acquisition, endowment management and eventual institutional consolidation.

Where direct financial tracing is no longer possible, the limitation should be explained.

No unsupported present-day monetary value should be assigned to historic transactions.

11.8. The 1948 formation of the Church Commissioners

The Church Commissioners were formed in 1948, incorporating Queen Anne's Bounty and the Ecclesiastical Commissioners.

The Commissioners' own publications acknowledge that the transfer of Queen Anne's Bounty funds into the new institutional endowment perpetuated the historical connection.

This is important because the present investigation concerns the responsibility of a continuing institution for historical wealth inherited from predecessor bodies.

The issue is not necessarily whether specific modern assets can be identified as unchanged holdings dating from the eighteenth century.

Rather, the historical research establishes a chain of institutional inheritance.

The Church Commissioners have acknowledged that connection.

RNL should examine the precise accounting and institutional framework through which predecessor assets entered the 1948 endowment.

It should also distinguish historical responsibility from any separate question of present legal liability.

The Commissioners' public expression of sorrow and their proposed reparatory response do not automatically determine every potential legal claim.

11.9. The decision to investigate historical origins in 2019

In 2019, the Church Commissioners decided to investigate the origins of their endowment and whether it contained connections with transatlantic chattel enslavement.

The research involved forensic accountants, academics and examination of archival financial records.

This institutional decision preceded the public announcement of the findings.

It is an important event in the development of Project Spire because it marks the beginning of the documented process through which the Commissioners sought to identify historical financial relationships.

RNL should obtain the terms of reference for the research and identify the persons or institutions responsible for undertaking it.

The investigation should also determine what historical periods, funds, transactions and records were examined.

This will help assess whether the published research adequately addresses the full scope of the historical connections or whether material gaps remain.

The existence of professional research is relevant evidence of institutional action.

Its completeness and limitations remain legitimate subjects of independent examination.

11.10. June 2022: the first public findings

On 16 June 2022, the Church Commissioners publicly announced initial findings concerning Queen Anne's Bounty and transatlantic chattel enslavement.

The announcement identified investments in the South Sea Company and benefactions associated with individuals connected to the enslavement economy.

The Commissioners expressed sorrow for the identified historical connections.

This announcement marked a significant public acknowledgement.

However, an acknowledgement of historical involvement is not itself a reparatory financial transfer.

Nor does an expression of sorrow establish that all persons and communities affected by the historical system have received recognition or material repair.

The June 2022 announcement should therefore be understood as a step in an institutional response.

Its significance must be recognised without treating it as the completion of reparatory justice.

Primary source:

Church Commissioners — Historic links announcement, 16 June 2022:

https://www.churchofengland.org/media/press-releases/church-commissioners-research-identifies-historic-links-transatlantic-chattel

11.11. January 2023: publication of the full research report

On 10 January 2023, the Church Commissioners published their fuller research findings.

The report expanded upon the historical evidence relating to Queen Anne's Bounty and the origins of the endowment.

The publication created a more substantial documentary foundation for public scrutiny.

It provided an opportunity to examine the nature of the investments, the historical transactions identified and the institutional response.

This is important to RNL's permanent-reference-library approach.

The report should be retained in full.

Its underlying evidence, source references, methodology and limitations should be indexed.

Where the report identifies matters requiring further investigation, those should be recorded.

An executive summary can assist readers, but it cannot replace the original historical research.

The documentary record must remain available for subsequent independent investigation.

Primary source:

Church Commissioners — Full research report announcement, 10 January 2023:

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Official research documents:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

11.12. The original £100 million commitment

Alongside the January 2023 publication, the Church Commissioners announced a £100 million funding commitment.

The commitment was intended to support a programme of investment, research and engagement over nine years beginning in 2023.

Its stated objectives included creating positive benefits for communities affected by the legacy of enslavement.

This is the financial foundation of Project Spire.

However, the amount must be accurately described.

The announcement of £100 million does not establish that £100 million was immediately transferred to a separate fund.

It does not establish that £100 million was distributed as grants.

Nor does it establish that individual descendants of enslaved African people received direct payments.

The programme's proposed investment model differs from a straightforward compensation scheme.

RNL must therefore examine the exact meaning of the commitment and how it is intended to generate reparatory outcomes.

11.13. The proposed impact investment approach

The Commissioners' original response included establishing an impact investment fund.

The stated ambition was to invest financial resources in ways intended to create positive social and economic effects, particularly for communities affected by historical enslavement.

The programme also envisaged using investment growth to support grants.

This approach requires careful examination.

Investment capital, investment returns, management expenditure and grant distributions perform different financial functions.

The existence of an investment fund does not automatically establish that financial value has been delivered directly to affected communities.

The investigation should identify the intended beneficiaries, investment criteria, ownership structures, risk arrangements and mechanisms for measuring social outcomes.

It should also establish whether investment decisions are expected to create direct community ownership, employment, access to capital, grants or other forms of benefit.

These questions are necessary to assess whether the programme delivers reparatory outcomes rather than merely undertaking investments described as beneficial.

11.14. The distinction between reparations and ordinary investment

A central investigative question concerns what makes an investment reparatory.

An ordinary investment may generate financial returns and beneficial secondary effects.

A reparatory investment should be examined in relation to the historical harm it is intended to address, the affected communities, the intended recipients and the mechanisms through which benefit is delivered.

The investigation must establish whether Project Spire has clear criteria explaining that connection.

For example, it may be necessary to examine whether investment returns are allocated to affected communities, whether investment capital supports enterprises owned or governed by descendants, and whether beneficiaries have a meaningful role in decisions.

No particular mechanism should be assumed to exist.

The purpose is to establish what the Commissioners actually intend and what they have implemented.

The programme's effectiveness cannot be determined solely from the size of the financial commitment.

It must ultimately be assessed against transparent outcomes.

11.15. Research and public engagement as components of the programme

The Church Commissioners' response also includes further historical research and engagement.

This has involved work associated with Church archives, educational programmes and discussion of institutional responsibility.

Such activities can contribute to historical recognition and public understanding.

They may also help identify evidence relevant to reparatory claims.

However, research and engagement should not be presented as identical to financial compensation.

The investigation must therefore record the purpose, cost, institutional authority and outputs of such activities.

It should distinguish research undertaken to establish historical facts from consultation used to shape programme decisions.

It should also establish how historical research may influence eligibility, investment policy, grant-making and institutional accountability.

These questions are particularly relevant to the documented work of Charmaine Simpson and Kwesi Ochosi examined in preceding sections.

11.16. The independent Oversight Group

In May 2023, the Church Commissioners initiated recruitment for an Oversight Group intended to advise on the development of the proposed investment fund and grant-making programme.

Membership was announced in July 2023.

The Group included individuals with experience in finance, investment, historical research, law, reparations, theology and community activity.

Its role was to advise the Commissioners on the programme's development.

This is a significant step because it introduced an expressly identified advisory process.

However, the title *Oversight Group* should not automatically be understood to mean that the Group possessed final legal authority over the Commissioners' endowment.

The published materials described an advisory role.

The precise powers and limits of that role must be established through the terms of reference.

The investigation should also determine what evidence of consultation the Group obtained and how that evidence influenced the recommendations.

Primary source:

Church Commissioners — Oversight Group recruitment announcement, 10 May 2023:

https://www.churchofengland.org/media/press-releases/church-commissioners-starts-recruitment-oversight-group-new-impact-investment

11.17. The Oversight Group's recommendations

The Oversight Group developed recommendations for the proposed Fund for Healing, Repair and Justice.

Its recommendations were formally accepted by the Church Commissioners' Board in November 2023 and published in March 2024.

The recommendations addressed programme purpose, investment, grant-making, institutional arrangements, community participation and financial administration.

The Group also recognised concerns about the scale of the original £100 million commitment.

One recommendation was that the full £100 million should be deployed towards impact rather than reduced by initial operating costs.

The Group recommended that the Church Commissioners meet relevant operating expenses separately, subject to later review if the fund became a separate entity.

This is a significant point for financial accountability.

It creates a documentary basis for examining whether the proposed £100 million commitment is intended to be preserved for reparatory activity rather than consumed by administrative expenses.

However, a recommendation does not automatically establish that its proposed accounting treatment has been fully implemented.

That requires verification through the relevant financial and governance records.

Primary source:

Oversight Group report:

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

11.18. The proposed relationship between the fund and the Church Commissioners

The Oversight Group recommended that the fund initially be housed within the Church Commissioners.

The recommendation reflected the Commissioners' existing institutional experience and resources.

This is relevant because it affects how financial responsibility and governance may operate during implementation.

A programme housed within an existing institution may have different legal and financial arrangements from a separately incorporated fund.

The investigation must therefore establish the model ultimately adopted.

This includes identifying whether a separate legal entity has been created, whether funds have been transferred, and which institution currently holds responsibility for decisions.

The existence of a recommendation to house the fund initially within the Commissioners does not establish the operational position as at October 2026.

The current arrangements require direct confirmation.

11.19. The proposed grant-making function

The original programme contemplated grants alongside investment activity.

The Oversight Group's recommendations discussed grant-making as part of the reparatory response.

This introduces questions about the identity of eligible recipients and the criteria through which applications may eventually be assessed.

Such questions are especially relevant to independent grassroots Black/Afrikan reparations organisations.

However, the existence of a proposed grant-making programme does not establish that applications are currently open or that particular organisations are entitled to receive funding.

The investigation should therefore establish the fund's operational status, its proposed eligibility criteria, application procedures, selection responsibilities and accountability mechanisms.

It should also determine whether community organisations were consulted on the design of those procedures.

The distinction between a future intention and an available financial opportunity must remain clear.

11.20. The position of independent grassroots organisations

The development of Project Spire raises legitimate questions about the participation of longstanding grassroots Black/Afrikan reparations organisations.

Such organisations may have contributed historical knowledge, community networks, campaigning expertise and practical experience over many years.

It is therefore reasonable to examine whether the Church Commissioners' consultation arrangements provide meaningful opportunities for their participation.

This does not mean that any particular organisation automatically possesses authority to represent every affected community.

Nor does it establish that all organisations should receive funding.

The appropriate question concerns the fairness, transparency and accessibility of the consultation and future grant-making processes.

The investigation should determine how independent organisations can contribute without being required to adopt institutional positions with which they disagree.

It should also establish how organisations can challenge decisions or report concerns about exclusion.

11.21. The relationship between historical benefit and reparatory responsibility

The historical research identifies financial relationships involving Queen Anne's Bounty.

The Church Commissioners' subsequent commitment reflects an institutional decision to respond to those findings.

However, the moral, historical and financial adequacy of that response remains a legitimate question.

The investigation should examine whether the proposed £100 million was calculated through a formal assessment of historical benefit or selected through a different decision-making process.

It should establish whether the Commissioners attempted to quantify the historical value received from slavery-related investments and benefactions.

It should also establish whether the programme was designed to correspond to identifiable losses experienced by affected communities.

The evidence should not be forced into a calculation that the historical records cannot support.

Where precise financial valuation is impossible, the limitation should be explained.

Nevertheless, difficulty in calculating historical value does not eliminate the need for institutional transparency concerning how the reparatory commitment was determined.

11.22. Why £100 million cannot be equated with completed reparations

The proposed £100 million commitment is a central public feature of Project Spire.

Its prominence creates a risk of misunderstanding if readers assume that the amount has already been delivered to beneficiaries.

The Church Commissioners' public information states that the Fund for Healing, Repair and Justice remains in implementation and is not yet operational.

The investigation must therefore distinguish the original commitment from actual allocations, expenditure, investments, transfers and verified benefits.

A financial commitment may remain subject to governance arrangements, regulatory approval, investment implementation and other conditions.

Research expenditure may already have occurred without constituting reparatory grants to affected communities.

An investment may be made before any benefits reach the intended communities.

Even after a transfer, the recipient and purpose must be verified.

These distinctions are essential to RNL's financial accountability methodology.

The investigation should not describe money as reparations delivered until the evidence demonstrates what was delivered, to whom, when and with what verified outcome.

11.23. Project Spire's continuing implementation status

The Church Commissioners' official enquiry page states that the proposed fund is in an implementation phase that includes establishing the necessary regulatory framework.

The page expressly indicates that the fund is not yet operational.

The fund's own public website also states that work continues on its structure, governance and delivery arrangements.

These statements are significant because they establish that the institutional programme has not yet reached the stage of a fully operational fund, according to the published information examined.

They do not establish that no related research or preparatory expenditure has occurred.

Nor do they establish that every regulatory or administrative step remains outstanding.

The investigation must seek the current status of each material implementation requirement.

It should identify what has been completed, what remains outstanding, who is responsible and what timetable is proposed.

Official sources:

Church Commissioners — Tell us what you think:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Fund for Healing, Repair and Justice:

https://hrjfund.org/

11.24. Institutional responsibility and the possibility of anti-Black racism

Project Spire arises from historical connections to the systematic exploitation of African people.

Its proposed response therefore requires particular care concerning institutional decision-making.

RNL seeks to establish whether safeguards exist against the possibility of anti-Black racism, racial bias and Institutional Racism affecting research, consultation, governance, selection or financial delivery.

The existence of a reparations programme does not automatically establish that such safeguards are adequate.

Nor does asking about safeguards establish that discrimination has occurred.

The investigation should examine the Commissioners' relevant policies and the practical mechanisms through which affected persons and organisations can raise concerns.

It should also determine whether decisions are independently reviewable and whether communities can obtain reasons for decisions affecting their interests.

The question is whether reparatory justice is supported by transparent and effective institutional protections.

11.25. Prevention of conflict and the importance of early accountability

RNL maintains that competent organisation, transparency and professional communication are essential safeguards for peace.

Reparatory justice concerns profound historical suffering, disputed institutional responsibilities and substantial proposed resources.

Where public expectations develop around a large financial commitment, inadequate information concerning access, governance or delivery can contribute to misunderstanding and frustration.

The possibility of escalation into intimidation, threats of violence or physical confrontation should therefore be recognised as a matter for preventative institutional planning.

This is not a prediction that violence will occur.

Nor is it an accusation against the Church Commissioners, Project Spire personnel or affected communities.

The investigation advocates lawful, peaceful and evidence-based methods of resolving disputes.

Its central preventative recommendation is that institutions address significant questions early, maintain accurate records and provide fair opportunities for clarification.

11.26. Project Spire as an example of institutional historical investigation

The Church Commissioners' decision to investigate their predecessor fund demonstrates that institutional financial history can be examined through archival records and professional accounting methods.

The research identified connections that were subsequently acknowledged publicly.

This creates a potentially important precedent for other institutions examining historical wealth.

However, the quality of the eventual reparatory outcome must be assessed separately from the historical research.

A strong historical investigation can establish responsibility while leaving difficult questions about implementation unresolved.

Likewise, a substantial public commitment can demonstrate institutional intention without proving financial delivery.

RNL should therefore evaluate Project Spire across distinct stages: historical investigation, acknowledgement, proposed remedy, authorisation, allocation, implementation and verified benefit.

That approach permits recognition of documented progress without confusing one stage with another.

11.27. The relevance of Project Spire's history to the Global Reparations Hub enquiry

The historical origins of Project Spire are independent of the October 2026 GRH launch.

The Commissioners' research commenced in 2019, the initial findings were published in 2022, and the full report and financial commitment were announced in January 2023.

These developments occurred before the GRH launch events examined in earlier sections.

The documented later participation of Charmaine Simpson and Kwesi Ochosi in Church-related activities and GRH-related events does not alter that institutional chronology.

It does, however, justify examining whether any formal relationships developed between the initiatives.

The investigation must distinguish the separate historical development of Project Spire from later professional or organisational connections.

The existence of overlapping participants cannot be used to rewrite the original purpose of the Commissioners' reparatory programme.

11.28. Questions requiring written clarification

The Church Commissioners should be asked to provide a clear account of the historical and institutional foundations of Project Spire.

The following questions arise directly from the available evidence.

Question 11.1: What were the original terms of reference for the historical research initiated in 2019?

Question 11.2: Which institutions, researchers and forensic accountants undertook the work?

Question 11.3: What records establish Queen Anne's Bounty's investments in the South Sea Company?

Question 11.4: What amounts were invested, what income was received and what happened to the resulting assets?

Question 11.5: Which benefactions have been positively identified as connected to African chattel enslavement, and which remain uncertain?

Question 11.6: What evidence traces relevant historical funds into the endowment formed in 1948?

Question 11.7: Were attempts made to calculate the present-day value of historical financial benefit?

Question 11.8: How was the original £100 million reparatory commitment calculated or otherwise determined?

Question 11.9: What proportion of the commitment is intended for investment, grants, research and other activities?

Question 11.10: Which Oversight Group recommendations have been adopted, modified or not adopted?

Question 11.11: How will operating expenses be financed, and will those expenses reduce the original £100 million intended for impact?

Question 11.12: What institutional or regulatory approvals have been completed, and which remain outstanding?

Question 11.13: Who presently holds legal responsibility for the proposed fund and its assets?

Question 11.14: What opportunities exist for affected communities and independent grassroots reparations organisations to participate in programme design?

Question 11.15: What evidence establishes that any funding has reached identified beneficiaries?

Question 11.16: What safeguards exist against the possibility of anti-Black racism and Institutional Racism in programme decision-making?

Question 11.17: What complaints, appeal and independent review mechanisms are available?

Question 11.18: What timetable and public reporting arrangements apply to the remaining implementation stages?

These questions concern historical evidence, institutional responsibility and the practical delivery of reparatory justice.

They are not accusations or allegations of wrongdoing.

11.29. Preliminary findings

The investigation establishes that the Church Commissioners initiated historical research in 2019 concerning the origins of their endowment.

The research identified financial connections between Queen Anne's Bounty and African chattel enslavement.

These included investments in the South Sea Company and benefactions associated with the plantation economy.

Queen Anne's Bounty's funds subsequently formed part of the Church Commissioners' endowment following the institutional merger in 1948.

The Commissioners publicly acknowledged these historical connections in 2022 and published fuller research in January 2023.

They announced a £100 million commitment intended to support a programme of investment, research and engagement.

An Oversight Group was subsequently established to advise on the response.

Its recommendations were accepted by the Commissioners' Board and published in 2024.

The proposed Fund for Healing, Repair and Justice remains under development, according to the official published information examined.

These are documented developments.

However, the available evidence does not establish that the full £100 million has been transferred to a separate fund or distributed to affected communities.

Nor does it establish that all questions about historical valuation, consultation, safeguards and financial accountability have been resolved.

11.30. Conclusion: from historical wealth to verified reparatory justice

Project Spire began with an institutional investigation into the historical origins of part of the Church Commissioners' endowment.

The research established financial connections between Queen Anne's Bounty and enterprises associated with African chattel enslavement.

The Church Commissioners publicly acknowledged those findings and developed a proposed reparatory response involving a substantial financial commitment.

These steps are significant and should be recorded accurately.

However, historical acknowledgement and financial commitment are not the same as verified reparatory delivery.

The investigation must therefore continue beyond the original announcement.

It must examine the design of the fund, the adequacy of financial arrangements, the transparency of decision-making, the participation of affected communities and the eventual receipt of benefits.

The proposed £100 million commitment should be examined in relation to the historical evidence, the intended reparatory objectives and the financial mechanisms through which benefits may be delivered.

The investigation must also establish what safeguards exist against anti-Black racism and Institutional Racism, what remedies are available where concerns arise, and how accountability will be maintained over time.

The central conclusion of Section 11 is that Project Spire has a documented historical and institutional foundation acknowledged by the Church Commissioners themselves, but the adequacy and completion of its reparatory response must be judged by transparent governance and independently verifiable delivery rather than announcement alone.

RNL will continue to distinguish promises from allocations, allocations from transfers, and transfers from verified benefits.

The objective remains historical truth, transparent institutional responsibility, professional organisation, community confidence and the peaceful delivery of reparatory justice.

SECTION 11 — HISTORICAL AND INSTITUTIONAL EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-11-001	Queen Anne's Bounty established in 1704	Established institutional history
SPIRE-11-002	Investments in South Sea Company securities	Documented in Commissioners' research
SPIRE-11-003	Benefactions associated with the enslavement and plantation economies	Documented, with varying degrees of certainty
SPIRE-11-004	Queen Anne's Bounty incorporated into Church Commissioners in 1948	Established institutional history
SPIRE-11-005	Historical research initiated in 2019	Official institutional record
SPIRE-11-006	Initial findings published June 2022	Official publication
SPIRE-11-007	Full research report published January 2023	Official publication

SPIRE-11-008	£100 million commitment announced January 2023	Official financial commitment
SPIRE-11-009	Oversight Group recruited and appointed in 2023	Official institutional record
SPIRE-11-010	Recommendations accepted and published in 2023–24	Official institutional record
SPIRE-11-011	Proposed impact investment and grant-making programme	Documented programme design
SPIRE-11-012	Current operational status of fund	Official information states not yet operational
SPIRE-11-013	Complete valuation of historical financial benefit	Requires further examination
SPIRE-11-014	Full allocation and transfer of £100 million	Not established
SPIRE-11-015	Independently verified reparatory receipt by beneficiaries	Not established by the sources reviewed
SPIRE-11-016	Adequacy and effectiveness of institutional safeguards	Further evidence required

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SOURCES AND INDEPENDENT VERIFICATION

Source 11.1 — Church Commissioners, June 2022

Church Commissioners' research identifies historic links to transatlantic chattel slavery.

https://www.churchofengland.org/media/press-releases/church-commissioners-research-identifies-historic-links-transatlantic-chattel

Evidence: Original acknowledgement of Queen Anne's Bounty's historical financial connections.

Source 11.2 — Church Commissioners, January 2023

Church Commissioners publishes full report into historic links to transatlantic chattel slavery and announces new funding commitment of £100 million.

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Evidence: Full research publication and original financial commitment.

Source 11.3 — Church Commissioners' historical research summary

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/what-we-know

Evidence: Queen Anne's Bounty, South Sea Company, benefactions and institutional inheritance.

Source 11.4 — Church Commissioners' original research and related documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Evidence: Historical research reports, Oversight Group material and related institutional documents.

Source 11.5 — Church Commissioners, May 2023

Recruitment of Oversight Group for new impact investment fund.

https://www.churchofengland.org/media/press-releases/church-commissioners-starts-recruitment-oversight-group-new-impact-investment

Evidence: Proposed advisory structure and remit.

Source 11.6 — Church Commissioners, March 2024

Church Commissioners welcomes Oversight Group's report.

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

Evidence: Published institutional response to recommendations.

Source 11.7 — Oversight Group report

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Evidence: Recommendations concerning purpose, governance, investment, grants, operating expenditure and accountability.

Source 11.8 — Church Commissioners, March 2025

From Commitment to Action: Our Continuing Journey.

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

Evidence: Institutional explanation of progress and implementation history.

Source 11.9 — Project Spire FAQs

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Evidence: Historical background, programme design and public explanations.

Source 11.10 — Official implementation status

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Fund implementation phase and statement that it is not yet operational.

Source 11.11 — Fund for Healing, Repair and Justice

https://hrjfund.org/

Evidence: Published fund-development information and continuing work on governance and delivery arrangements.

END OF SECTION 11 — PROJECT SPIRE'S ORIGINAL PURPOSE, HISTORICAL ENSLAVEMENT CONNECTIONS, INSTITUTIONAL RESPONSIBILITY AND THE DEVELOPMENT OF ITS REPARATORY JUSTICE PROGRAMME

NEXT: SECTION 12 OF 24 — THE CHURCH COMMISSIONERS' HISTORICAL RESEARCH: QUEEN ANNE'S BOUNTY, THE SOUTH SEA COMPANY, BENEFACTIONS, WEALTH TRANSFER, HISTORICAL VALUATION AND EVIDENTIAL LIMITATIONS.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 12 OF 24

THE CHURCH COMMISSIONERS' HISTORICAL RESEARCH: QUEEN ANNE'S BOUNTY, THE SOUTH SEA COMPANY, BENEFACTIONS, WEALTH TRANSFER, HISTORICAL VALUATION AND EVIDENTIAL LIMITATIONS

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Substantial primary documentary findings established; valuation, historical asset tracing, institutional responsibility and the relationship between historical financial benefit and proposed reparatory expenditure require further examination.

12.1. Purpose of this section

This section undertakes a detailed examination of the financial and historical evidence upon which the Church Commissioners for England based their acknowledgement of connections with African chattel enslavement and their subsequent development of Project Spire.

The central documentary source is the Church Commissioners' report, *Research into Historic Links to Transatlantic Chattel Slavery*, published in January 2023.

That report identifies historical investments held by Queen Anne's Bounty, financial income arising from those investments, benefactions received from individuals potentially associated with enslavement, and attempts to trace relevant assets into later institutional holdings.

The report is important because it moves the discussion beyond broad historical association.

It identifies financial records, investment transactions, income streams, research methods and limitations.

Reparation Nation Limited considers these matters fundamental to understanding the origins of Project Spire and evaluating the adequacy of its proposed reparatory response.

The investigation must determine what historical wealth has been identified, how confidently its origins can be established, how it was used, whether it can be traced into subsequent assets and how the Church Commissioners determined the amount of their proposed financial commitment.

A distinction must be maintained between the original documentary findings, the Commissioners' interpretation of those findings, the conclusions of independent researchers and RNL's outstanding investigative questions.

Primary research report:

https://data.parliament.uk/DepositedPapers/Files/DEP2025-0405/Research_into_Historic_Links_to_Transatlantic_Chattel_Slavery_Report.pdf

12.2. The institutional origins of Queen Anne's Bounty

Queen Anne's Bounty was established in 1704 to improve the financial position of poorer clergy within the Church of England.

It administered resources intended to supplement clerical incomes through financial support and the acquisition of income-producing assets.

The institution operated during a period when Britain was deeply involved in the expansion of transatlantic African chattel enslavement and the economic networks associated with that system.

The Bounty received funds through several mechanisms, including benefactions and investment income.

These resources could be used to purchase land or otherwise support the Bounty's objectives.

This created an institutional structure through which financial resources might be received, invested, distributed or converted into other forms of wealth.

The relevance to Project Spire is direct.

Queen Anne's Bounty subsequently became one of the predecessor institutions whose assets were incorporated into the Church Commissioners in 1948.

The historical investigation therefore concerns not simply the actions of a remote institution that ceased to exist.

It concerns the documented financial history of a predecessor whose assets and responsibilities formed part of the modern Church Commissioners' institutional inheritance.

12.3. Why the Church Commissioners initiated the research

The Church Commissioners began examining the historical origins of their endowment in 2019.

The initiative arose following questions from the Commissioners' Audit and Risk Committee.

Initial archival examination identified matters warranting closer investigation.

The Commissioners subsequently commissioned forensic accounting research, supported by specialist historical expertise.

The objective was to establish whether Queen Anne's Bounty held assets or received income connected to transatlantic chattel enslavement.

This distinction is important.

The research was not merely an exercise in identifying individuals who expressed historical support for slavery.

It was an examination of the financial records of an institution.

The research sought to identify assets, transactions, income, benefactions and possible continuing financial consequences.

For RNL, this provides a basis for assessing whether the institution's later reparatory commitment corresponds to the financial evidence identified through its own research.

12.4. The researchers and their responsibilities

The forensic accounting assignment was undertaken by Grant Thornton UK LLP.

The work was supported by historical expertise, including Professor Arthur Burns of King's College London and Dr Helen Paul of the University of Southampton.

The published report identifies the use of financial ledgers, benefaction registers, archival documents and asset records.

The involvement of professional accountants and historians is relevant because financial records dating from the eighteenth and nineteenth centuries require specialist interpretation.

Historical transactions may be recorded through terminology and accounting conventions different from those used today.

Names and titles may appear inconsistently.

Some documents may be incomplete or difficult to read.

Others may refer to transactions whose underlying commercial circumstances require additional historical research.

RNL should therefore examine the methodology and supporting records rather than relying exclusively on headline financial values.

The existence of professional research is a significant evidential strength.

However, professional expertise does not remove the possibility of methodological limitations or legitimate scholarly disagreement.

Those matters must be examined through the published work and any relevant responses.

12.5. The four principal forensic accounting objectives

The published research describes four main objectives.

The first was to examine Queen Anne's Bounty ledgers for financial relationships with the South Sea Company.

The second was to investigate what became of assets associated with the South Sea Company that remained in the Bounty's possession at the end of the available ledger period.

The third was to analyse benefaction registers covering the period from 1713 to 1850.

The fourth was to trace a sample of benefactions into subsequent assets.

This methodology is particularly important because it identifies the boundaries of the investigation.

The research did not claim to reconstruct every transaction across the entire three-hundred-year institutional history.

It examined identified records over specified periods and tested particular historical financial connections.

The conclusions must therefore be assessed within those boundaries.

A limitation in the surviving records does not automatically establish that no further historical connection existed.

Equally, the possibility of additional connections does not establish them without evidence.

12.6. The South Sea Company: historical establishment and purpose

The South Sea Company was established in 1711.

It was associated with refinancing British public debt and received commercial privileges connected to Britain's trade with Spanish America.

Those arrangements included involvement in trafficking enslaved African people.

The Church Commissioners' historical report describes the company as a substantial participant in the transatlantic trade in enslaved people.

The company's history is sometimes publicly associated principally with the financial events known as the South Sea Bubble.

However, that financial history does not eliminate its involvement in chattel enslavement.

For this investigation, the relevant question is how Queen Anne's Bounty invested in South Sea Company financial instruments and what income it received.

The institution's investment relationship must be established through the actual assets held, their dates and the payments recorded.

A financial connection may exist even where an investor did not directly operate a slave-trading vessel.

The nature of that connection should be described accurately.

12.7. The human consequences documented in the report

The Church Commissioners' research estimates that the South Sea Company transported approximately 34,000 enslaved African people during at least 96 transatlantic voyages.

The report identifies the company's central involvement in the traffic between the early eighteenth century and 1739.

These figures provide essential historical context.

They concern human beings subjected to coercion, deprivation of liberty, forced transportation and commercial exploitation.

They must not be reduced to mere commercial quantities.

The investigation should nevertheless distinguish the South Sea Company's overall historical activities from the specific financial exposure of Queen Anne's Bounty.

The fact that the Bounty held South Sea Company securities does not establish that it financed or profited from each individual voyage in a directly traceable manner.

The documentary finding concerns the Bounty's investments in and income from instruments associated with the company.

The wider history explains why that financial relationship has reparatory significance.

12.8. The principal investment period: 1723 to 1777

The Commissioners' published research identifies a substantial and prolonged financial relationship.

From 1723 to 1777, Queen Anne's Bounty invested funds not required for land purchases or operating expenses almost exclusively in South Sea Company annuities.

This is one of the most significant findings.

It establishes that the relationship was not simply a small, isolated transaction.

The research identifies a sustained institutional investment pattern.

The distinction between a company's ordinary shares, annuities and other financial instruments is important.

Each instrument may carry different rights, risks and methods of generating income.

The investigation must avoid treating every South Sea Company annuity as though it provided identical exposure to the company's slave-trading operations.

However, the formal financial connection and income associated with those securities remain matters established by the historical research.

RNL should seek the complete investment schedules, including purchase dates, nominal values, returns and disposal dates.

12.9. The historical investment value in 1739

The report identifies that, by 1739, when the South Sea Company ceased trading enslaved people, Queen Anne's Bounty held investments in South Sea Company annuities valued at approximately £204,000 in the money of that period.

The report provides an illustrative equivalent of approximately £443 million in contemporary terms.

This is a significant financial figure.

However, it must be described precisely.

The £204,000 represents the approximate historical value of the relevant investment holdings at a particular date.

The £443 million is an illustrative conversion using a historical monetary comparison method.

It is not an independently traced amount of present-day Church Commissioners assets.

It is not a demonstrated legal debt owed to any particular claimant.

Nor does it establish that the Bounty received £443 million in modern purchasing power as profit.

The distinction between invested principal, income received and present-day valuation must be maintained throughout the investigation.

12.10. Historical income from South Sea Company securities

The Commissioners' research states that approximately 30% of Queen Anne's Bounty's recorded income during the available ledger period from 1708 to 1793 was derived from interest and dividends associated with South Sea Company investments.

This is a substantial finding.

It provides an indication of the importance of those investments to the Bounty's financial operations.

The 30% figure must nevertheless be understood within the methodology and record period from which it was derived.

It does not necessarily represent 30% of the institution's entire income across every year of its existence.

Nor does it establish that 30% of the present Church Commissioners' endowment originates from slavery-related activities.

The denominator, periods of account and treatment of different income categories must be examined.

RNL should seek the calculation worksheets and explanatory methodology used to derive the percentage.

12.11. The reported £1.4 billion modern income equivalent

Grant Thornton's published account of its forensic work states that the South Sea Company investments generated income equivalent to approximately £1.4 billion in today's terms.

This figure is important and should not be omitted from the investigation.

However, it requires careful interpretation.

It is an estimate obtained by converting historical financial income into a modern comparative value.

It is not evidence that £1.4 billion currently exists as a separately identifiable asset in the Church Commissioners' portfolio.

It should not be added automatically to the £443 million investment-equivalent figure.

The two figures describe different financial concepts.

The original amounts, dates, conversion methodology and treatment of cumulative income require examination before comparisons can be made.

Nor should the figure be equated automatically with net profit directly attributable to trafficking enslaved African people.

The relationship between historical financial instruments and the economic activities of the South Sea Company requires careful interpretation.

Independent source:

Grant Thornton — *Investigating the Church's links to the Slave Trade*:

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

12.12. Investment income versus capital appreciation

A further important finding is that the forensic report did not identify capital appreciation on the Bounty's South Sea Company annuities over the period considered.

This must be distinguished from the separate finding that the securities generated interest and dividends.

A financial holding may produce income without increasing in capital value.

Therefore, the absence of capital appreciation does not mean that the investment produced no financial benefit.

Equally, receipt of interest or dividends does not establish that all those payments came directly from a particular slave-trading voyage.

RNL should examine the source and structure of the payment obligations attached to the securities.

The important distinction is between historical investment holdings, income received, capital changes and broader economic association.

Each element should be recorded separately.

This approach will help prevent inaccurate descriptions of either the extent or the nature of the historical financial benefit.

12.13. The period after the South Sea Company's slave-trading activities

The South Sea Company ceased its direct trading of enslaved people in 1739.

Queen Anne's Bounty continued to hold South Sea Company-related annuities after that date.

The Commissioners' report identifies an investment peak in 1777, followed by the gradual reduction and eventual exit from those holdings by 1831.

This introduces an important historical distinction.

The date the company ceased participating directly in trafficking enslaved people is not identical to the date on which the Bounty disposed of its relevant securities.

The later investments and income must therefore be examined in their proper historical and financial context.

The investigation must not describe every payment received after 1739 as a direct payment from an ongoing slave-trading operation.

At the same time, the earlier origins of the company and the financial instruments remain relevant to the institutional historical enquiry.

The proper analysis requires both chronological precision and careful identification of the economic relationship.

12.14. The benefaction registers

A separate major component of the research concerns benefactions.

Queen Anne's Bounty received donations and other contributions from individuals and estates.

The forensic researchers examined benefaction registers covering the period from 1713 to 1850.

Their objective was to identify benefactors whose wealth may have been associated with transatlantic chattel enslavement or related economic activities.

This aspect of the investigation presents methodological difficulties.

The existence of a donation from a named person does not, by itself, establish the source of the money donated.

A benefactor may have received income from several sources.

A donation may have been made by an executor, trustee or representative rather than directly by the individual whose name appears in the record.

The researchers therefore had to distinguish identifiable historical associations from uncertainty concerning the origin of particular funds.

RNL should preserve that distinction.

12.15. Edward Colston and relevant benefactions

The forensic report identifies Edward Colston among the benefactors selected for closer investigation.

Colston's historical involvement in the economic structures of enslavement made him a relevant figure for the research.

The researchers examined a sample including ten benefactions attributed directly to Colston or through his descendants.

The purpose was to investigate whether those benefactions could be traced into assets subsequently held by Queen Anne's Bounty and eventually the Church Commissioners.

The investigation should distinguish three matters.

The first is the historically documented involvement of the benefactor in enslavement-related economic activity.

The second is the documentary evidence of money or property being given to Queen Anne's Bounty.

The third is whether a specific benefaction can be traced into a present-day asset.

Each requires its own evidence.

The existence of the first two does not automatically establish the third.

12.16. The wider benefaction sample

The forensic researchers examined a sample of benefactions from twenty identified individuals or families.

The sample included ten benefactions associated with Edward Colston and fifty-one benefactions involving nineteen additional individuals or families.

These records were examined to determine how funds were used, including land purchases.

The purpose was to test whether relevant assets could be traced into later institutional holdings.

The sampling approach is important.

It demonstrates a targeted asset-tracing exercise rather than an exhaustive reconstruction of every benefaction across the entire period.

RNL should examine how the sample was selected and whether it was intended to be statistically representative.

The research should not be interpreted as proving that all potentially slavery-connected benefactions were individually traced.

Nor should the difficulty of tracing sampled assets be treated as evidence that their historical origins were irrelevant.

12.17. The problem of identifying historical benefactors

The research identifies several difficulties involving historical names and records.

Names could be spelled differently in separate documents.

Individuals could be identified through titles rather than full names.

More than one person might have held the same title over the period.

Some entries could refer to trustees or executors acting on behalf of an estate.

The registers also contained amendments, deletions and inconsistencies.

These difficulties affect the confidence with which a particular benefaction can be associated with a named historical individual.

A responsible investigation should therefore identify the basis for each attribution.

Where documentary identification is strong, that should be stated.

Where multiple interpretations remain possible, uncertainty should be retained.

This is particularly important when producing a public database or reference library that may be consulted by descendants, historians and other researchers.

12.18. The tracing of benefactions into land

The report explains that benefactions were often used to purchase land supporting clergy incomes.

The researchers therefore examined estate records to identify the properties acquired through selected benefactions.

This introduced a second stage of investigation.

The first stage concerned where the benefaction came from.

The second concerned what the institution did with it.

The third concerned whether the resulting asset remained within institutional ownership.

This distinction is essential.

A historical donation may have funded a land purchase.

That land may subsequently have generated income, been sold or been replaced by other investments.

The current existence of the original property is only one part of the wider question of historical financial benefit.

12.19. The limits of the published asset-tracing exercise

The forensic report states that many of the properties examined had subsequently been sold.

Where a sale was identified, the researchers generally did not continue tracing the proceeds beyond that point.

For properties without an identified sale, they checked current records to determine whether the Church Commissioners still held them.

The research concluded that few, if any, of the sampled properties were likely to remain in the Commissioners' contemporary portfolio.

In some cases, the evidence remained inconclusive.

This finding requires careful interpretation.

It does not establish that the original benefactions produced no continuing institutional financial benefit.

It establishes that the researchers could not identify many surviving original properties and that their asset-tracing exercise had a defined stopping point.

The sale of an asset does not mean that the institution received no sale proceeds.

Those proceeds may have been used for other purposes.

However, any continuing financial benefit would need to be demonstrated through further records.

12.20. Wealth transfer through reinvestment

The distinction between the survival of an original asset and the survival of financial benefit is central to the investigation.

An institution may receive money, purchase land, obtain rental income, sell the land and use the proceeds for other activities.

Over time, the original source of the money may become difficult to identify within a larger endowment.

That process can complicate efforts to trace historical wealth.

However, the conceptual possibility of reinvestment is not a substitute for documentary evidence demonstrating what actually occurred.

RNL should therefore ask what happened to the proceeds of sampled property sales and whether any surviving records permit further tracing.

The investigation should not presume that every historical donation generated present-day assets of a particular value.

Equally, it should not confuse the disappearance of an original holding with proof that all financial consequences ended.

The matter requires evidence.

12.21. The 1948 institutional merger

Queen Anne's Bounty and the Ecclesiastical Commissioners were merged into the Church Commissioners in 1948.

This merger is significant because it provides an institutional link between the predecessor fund and the present Church Commissioners.

The historical report identifies Queen Anne's Bounty as part of the origins of the modern endowment.

However, the merger itself does not provide a complete transaction-by-transaction account of the financial value inherited from every historical source.

RNL should therefore distinguish institutional succession from precise asset tracing.

The institutional connection is documented.

The precise proportion of present-day assets attributable to particular eighteenth-century transactions may remain uncertain.

That distinction should not be used either to exaggerate or minimise the historical evidence.

12.22. The question of present-day valuation

Historical monetary conversion is one of the most difficult parts of the investigation.

A sum of money in 1739 can be expressed in present-day terms using different comparison methods.

Possible methods include purchasing-power measures, earnings-based comparisons, relative economic size and investment-return calculations.

These methods answer different questions.

A purchasing-power conversion asks what a historical sum might buy relative to contemporary prices.

An earnings-based comparison examines its relationship to wages or labour costs.

An investment-growth calculation asks what a sum might have become under specified assumptions about returns and reinvestment.

None automatically establishes the amount legally owed in reparations.

Nor does a historical equivalent prove that the same value remains within a present-day institution.

The Church Commissioners' report uses a labour earnings index for its illustrative conversion.

RNL must therefore identify the selected index, reference dates and assumptions before using the resulting modern figures.

12.23. The £443 million and £1.4 billion figures must not be conflated

Two important comparative figures appear in the published research and accompanying professional material.

The first is the approximate £443 million modern equivalent associated with the £204,000 investment holdings recorded for 1739.

The second is Grant Thornton's approximately £1.4 billion modern equivalent for income generated by the relevant investments.

These figures describe different financial categories.

The first concerns the historical investment value at a specified date.

The second concerns historical income over an extended period.

They must not be added together without a justified financial methodology.

They also must not be compared directly with the proposed £100 million reparatory commitment as though all three figures were identical types of valuation.

The investigation should obtain the original calculations and determine whether the figures can legitimately be used for any comparative measure of reparatory adequacy.

Their significance should neither be exaggerated nor concealed.

12.24. Why the original £100 million reparatory commitment requires explanation

The Church Commissioners announced a £100 million commitment in January 2023.

The historical research identifies significant financial relationships involving Queen Anne's Bounty.

However, the investigation has not yet established that the £100 million figure was derived directly from a calculation of historical financial benefit.

It must therefore ask how that figure was determined.

Was it based upon a valuation of historical investments and income?

Was it calculated through an assessment of current institutional resources?

Did the Commissioners consider alternative amounts?

Were affected communities consulted about the proposed scale?

Was the sum selected through a policy and governance process rather than a financial restitution calculation?

These are legitimate questions.

The £100 million commitment should not automatically be described as equivalent to the historical value received.

Nor should it be dismissed as inadequate solely because a historical conversion produces a larger headline figure.

The basis for the comparison must first be established.

12.25. The distinction between financial responsibility and legal liability

The Church Commissioners' acknowledgement of historical connections is important evidence of institutional historical responsibility.

However, institutional acknowledgement and legal liability are different matters.

The legal implications of historical investment relationships may depend upon statutory provisions, charitable obligations, limitation rules, institutional succession and other legal considerations.

A moral or religious decision to undertake reparatory action does not automatically establish that every potential legal claim has been accepted.

Equally, the absence of an established legal obligation would not, by itself, determine whether a reparatory response is morally or historically justified.

RNL should therefore examine the Church Commissioners' own explanation of the legal basis for Project Spire.

The investigation should distinguish institutional responsibility, legal authority to make reparatory commitments and any independently asserted claims for compensation.

No legal conclusion should be presented without an adequate evidential and legal foundation.

12.26. Historical debate and contested interpretations

The historical research has been subject to public criticism.

Some commentators have questioned the financial interpretation of the South Sea Company investment relationship and the conclusions drawn concerning institutional profit from slavery.

The Church Commissioners have defended their research and publicly reaffirmed their findings.

The existence of this debate is relevant to an independent investigation.

RNL should preserve the original arguments, supporting records, criticisms and institutional responses.

This is not an invitation to treat all historical interpretations as equally supported.

Claims should be assessed against the quality and relevance of the underlying evidence.

The commissioners' own report identifies South Sea Company holdings and associated income.

Criticism concerning how those instruments should be interpreted may affect conclusions about the precise nature and amount of financial benefit.

It does not, without further analysis, erase the documented existence of the investments.

Relevant public records:

Grant Thornton's explanation of its investigation:

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

Church of England General Synod proceedings, July 2024:

https://www.churchofengland.org/sites/default/files/2024-11/july-group-sessions-2024.pdf

12.27. The significance of parliamentary scrutiny

Questions concerning the Church Commissioners' historical investments have also been raised in Parliament.

On 22 May 2025, Diane Abbott MP asked about the extent of historical financial connections, the companies involved, the period of profit and whether any resulting wealth remained within the present endowment.

Marsha De Cordova MP, responding as Second Church Estates Commissioner, referred to the forensic research and offered to provide further information.

These questions overlap substantially with RNL's own investigative concerns.

Their inclusion demonstrates that detailed questions about historical financial benefit and asset tracing are legitimate matters of public scrutiny.

However, the parliamentary exchange does not itself answer every question raised.

The investigation should seek any subsequent written response and compare it against the original research.

Parliamentary record:

https://hansard.parliament.uk/commons/2025-05-22/debates/2F7DEF1C-70DD-4E51-9962-CE3DCB5694AC/ChurchAssetsHistoricalLinkToSlavery

12.28. Transparency concerning the underlying research materials

The Church Commissioners' research relied on historical ledgers, benefaction registers and other archival materials.

The report states that digital images of relevant ledgers and registers have been created and made available through Lambeth Palace Library's archival systems.

This provides an important opportunity for independent verification.

RNL should establish how members of the public can access the digitised records remotely.

Where access requires specialist software, institutional permission or an in-person visit, those restrictions should be documented.

The existence of a published research report does not automatically mean that every underlying source is straightforward for ordinary readers to inspect.

A comprehensive reference library should therefore include direct links to records wherever available and clear instructions for accessing material held through archival catalogues.

This would strengthen the investigation's transparency and long-term value.

12.29. The potential value of further forensic examination

The Church Commissioners' published report provides a substantial starting point.

However, it also identifies limitations in the available records and the asset-tracing exercise.

RNL may therefore reasonably ask whether further forensic research is practicable.

Such research might examine the proceeds of historically identified land sales, additional investment ledgers, surviving estate accounts or transactions following the original research period.

It may also examine the relationship between historical income and later endowment accumulation.

Any additional analysis should be undertaken using transparent assumptions and suitably qualified expertise.

RNL should not invent precise financial valuations where the documentary record cannot support them.

However, the presence of evidential gaps should be treated as a reason to identify possible sources, not as a justification for ending enquiry prematurely.

12.30. The role of affected communities in historical interpretation

Historical research concerning African chattel enslavement should not be confined to institutional financial records alone.

Those records may establish the movement of money, but they do not necessarily capture the experiences of enslaved African people and their descendants.

Historical evidence may also exist in records concerning African societies, forced migration, plantations, resistance, family histories and the social consequences of enslavement.

RNL considers it important that affected communities can examine and contribute to the historical understanding of reparatory claims.

However, community testimony and financial accounting perform different evidential functions.

The investigation should neither dismiss lived and inherited historical experience nor treat it as a substitute for specific financial documentation when precise monetary claims are being examined.

The objective is to preserve the fullest relevant historical record.

12.31. The evidential relationship between historical victims and present beneficiaries

One of the most difficult questions concerns the relationship between the historical people subjected to enslavement and the communities whom Project Spire intends to benefit.

The South Sea Company transported enslaved African people across the Atlantic.

The Church Commissioners' research identifies Queen Anne's Bounty's financial association with the company.

However, those facts alone do not identify every present-day person or community entitled to a particular reparatory benefit.

The investigation should therefore examine how Project Spire defines affected communities.

It should determine whether eligibility is based upon historical geography, descent, institutional relationship, community need, economic disadvantage or other criteria.

These are matters for later sections concerning fund design and delivery.

Nevertheless, their historical foundation belongs in this section because the identification of beneficiaries must be connected transparently to the historical harms the programme seeks to address.

12.32. The possibility of anti-Black racism in historical and financial interpretation

RNL seeks evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism affecting Project Spire's decision-making.

This concern extends to the historical research process.

Relevant questions include how research priorities were established, who was consulted, how African historical perspectives were incorporated and whether affected communities could challenge omissions or interpretations.

The existence of professional accounting expertise does not remove the need for institutional safeguards.

Nor does the identification of shortcomings automatically establish discriminatory intent.

RNL's enquiry concerns whether appropriate systems exist for recognising, preventing and correcting racial bias.

The investigation should seek evidence of research review, independent scrutiny, consultation and procedures for handling disputes concerning historical interpretation.

12.33. Preventing conflict through accessible historical evidence

RNL maintains that transparency and professional organisation are essential safeguards for maintaining peace.

Questions concerning the origins of institutional wealth, the value of historical benefit and the adequacy of proposed reparatory commitments may generate deeply held disagreements.

Where substantial financial resources are involved, inaccurate figures or unclear explanations may intensify mistrust.

The possibility of intimidation, threats of violence or violence should therefore be considered seriously as a matter of prevention.

This does not imply that any person involved in Project Spire has threatened violence.

Nor does it presume that affected communities will respond violently to disagreement.

The purpose is to reduce avoidable conflict through accurate records, transparent calculations, accessible explanations and fair opportunities to challenge conclusions.

Responsible historical investigation is therefore one component of peaceful reparatory justice.

12.34. Priority questions concerning the financial research

The following questions arise from the published evidence and require formal written clarification.

Question 12.1: What complete schedules identify Queen Anne's Bounty's South Sea Company investments, including acquisition dates, values, income and disposal dates?

Question 12.2: What financial instruments were held, and how did their rights and payment structures relate to the South Sea Company's activities?

Question 12.3: What methodology produced the approximate £204,000 historical investment value identified for 1739?

Question 12.4: What assumptions produced the illustrative £443 million contemporary equivalent?

Question 12.5: What original calculations support the finding that approximately 30% of recorded income from 1708 to 1793 arose from South Sea Company investments?

Question 12.6: What methodology supports the approximately £1.4 billion contemporary income equivalent described by Grant Thornton?

Question 12.7: Were all relevant historical investment and income records examined, or do material gaps remain?

Question 12.8: How were the sampled benefactors identified, and what evidential standards were applied to determining possible connections with enslavement?

Question 12.9: Which benefactions were traced into specific land purchases?

Question 12.10: Which properties were subsequently sold, and what records survive concerning the proceeds?

Question 12.11: Why was further tracing of sale proceeds generally outside the scope of the original exercise?

Question 12.12: Is further asset tracing possible through surviving historical estate and financial records?

Question 12.13: What evidence identifies the value and composition of Queen Anne's Bounty assets transferred into the Church Commissioners in 1948?

Question 12.14: Has any defensible estimate been made of the proportion of present-day endowment assets attributable to identified historical financial relationships?

Question 12.15: Was the proposed £100 million reparatory commitment calculated by reference to historical financial benefit?

Question 12.16: If not, what process and criteria determined the amount?

Question 12.17: What independent review or peer scrutiny has been undertaken concerning contested interpretations?

Question 12.18: How can ordinary members of the public access the digitised historical financial records?

Question 12.19: What procedures permit affected communities and independent researchers to challenge the completeness or interpretation of the historical findings?

Question 12.20: What safeguards exist against the possibility of anti-Black racism and Institutional Racism affecting the research, interpretation and use of historical financial evidence?

These questions are intended to establish the documentary facts.

They are not accusations or allegations of misconduct.

12.35. Preliminary findings

The Church Commissioners' published research establishes that Queen Anne's Bounty held substantial South Sea Company-related investments.

It identifies a sustained period of investment in South Sea Company annuities.

By 1739, the approximate historical value of those holdings was £204,000, accompanied by an illustrative modern equivalent of approximately £443 million.

The research also identifies a significant share of Queen Anne's Bounty's recorded income as arising from interest and dividends associated with South Sea Company investments.

Grant Thornton separately describes the historical income in terms of an estimated £1.4 billion modern equivalent.

The report identifies benefactions from individuals whose wealth may have been connected to African chattel enslavement.

It also describes an asset-tracing exercise examining selected benefactions and related land purchases.

That exercise identified significant limitations, including historical sales and the decision not generally to continue tracing proceeds beyond them.

The available evidence therefore establishes historical financial connections and meaningful income relationships.

However, the complete present-day value of any surviving financial benefit has not been established by the figures alone.

The evidence also does not establish that the proposed £100 million reparatory commitment represents a calculated equivalent of the historical benefit.

These distinctions remain central to the investigation.

12.36. Conclusion: historical evidence must govern reparatory accountability

The historical research underlying Project Spire provides a substantial documentary foundation for examining the Church Commissioners' institutional relationship with African chattel enslavement.

The findings concern identifiable investments, financial income, benefactions and the subsequent inheritance of institutional assets.

The South Sea Company investment relationship is particularly important because of its duration and the scale of financial involvement recorded.

The benefaction research adds a separate category of historical connection involving donors whose wealth may have derived from enslavement and the plantation economy.

The published forensic examination also identifies limitations concerning historical records, asset tracing and monetary conversion.

Those limitations must be acknowledged without using them to erase established findings.

The investigation must neither exaggerate the evidence nor diminish its significance.

The amounts of approximately £443 million and £1.4 billion require careful financial interpretation and must not be confused with present-day assets or legally established compensation liabilities.

The proposed £100 million Project Spire commitment must be examined independently to establish how it was determined and how it will produce verifiable reparatory outcomes.

RNL will continue to preserve the original evidence, examine competing historical interpretations, seek further documentation and distinguish institutional acknowledgement from completed reparatory delivery.

The central conclusion of Section 12 is that the Church Commissioners' own forensic research identifies substantial historical financial connections between Queen Anne's Bounty and African chattel enslavement, while important questions remain concerning the valuation of historical benefit, the tracing of wealth into later assets and the relationship between that evidence and the proposed £100 million reparatory response.

The purpose of continued investigation is to support historical truth, transparent financial accountability, professional organisation, meaningful community participation and peaceful reparatory justice.

SECTION 12 — HISTORICAL FINANCIAL EVIDENCE REGISTER

Evidence ID	Finding or question	Evidential status
SPIRE-12-001	Queen Anne's Bounty established in 1704	Established institutional history
SPIRE-12-002	South Sea Company established in 1711	Established historical record
SPIRE-12-003	South Sea Company transported approximately 34,000 enslaved people	Published historical research estimate
SPIRE-12-004	Substantial South Sea Company annuity investments, 1723–1777	Documented forensic finding

SPIRE-12-005	Approximately £204,000 in annuity holdings in 1739	Published historical valuation
SPIRE-12-006	Approximately £443 million modern illustrative equivalent	Historical conversion estimate; not present asset tracing
SPIRE-12-007	Approximately 30% of recorded 1708–1793 income associated with South Sea Company investments	Published forensic finding
SPIRE-12-008	Approximately £1.4 billion modern equivalent of historical income	Grant Thornton comparative estimate
SPIRE-12-009	Continued annuity holdings after 1739, exiting by 1831	Documented investment history
SPIRE-12-010	Benefactions potentially associated with enslavement	Documented research findings with uncertainties
SPIRE-12-011	Edward Colston among identified benefactors	Documented
SPIRE-12-012	Selected benefactions traced into land purchases	Documented sample-based exercise
SPIRE-12-013	Many sampled properties subsequently sold	Published asset-tracing result
SPIRE-12-014	Sale proceeds generally not traced beyond disposal	Published methodological limitation
SPIRE-12-015	Queen Anne's Bounty merged into Church Commissioners in 1948	Established institutional succession
SPIRE-12-016	Complete present-day value of traced historical benefit	Not established
SPIRE-12-017	Direct calculation connecting historical benefit with £100 million commitment	Not established
SPIRE-12-018	Further forensic tracing of historical assets	Outstanding investigative possibility

SOURCES AND INDEPENDENT VERIFICATION

Source 12.1 — Church Commissioners, January 2023

Research into Historic Links to Transatlantic Chattel Slavery.

Complete research report:

https://data.parliament.uk/DepositedPapers/Files/DEP2025-0405/Research_into_Historic_Links_to_Transatlantic_Chattel_Slavery_Report.pdf

This is the principal source for the forensic accounting methodology, South Sea Company investments, benefactions, asset tracing and monetary conversion.

Source 12.2 — Grant Thornton

Investigating the Church's links to the Slave Trade.

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

Evidence: Forensic accounting work, £443 million illustrative investment equivalent and approximately £1.4 billion modern income equivalent.

Source 12.3 — Church Commissioners, 16 June 2022

Church Commissioners' research identifies historic links to transatlantic chattel slavery.

https://www.churchofengland.org/media/press-releases/church-commissioners-research-identifies-historic-links-transatlantic-chattel

Evidence: Initial institutional acknowledgement.

Source 12.4 — Church Commissioners, 10 January 2023

Church Commissioners publishes full report into historic links to transatlantic chattel slavery and announces new funding commitment of £100 million.

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Evidence: Research publication and original reparatory commitment.

Source 12.5 — Church Commissioners

What we know.

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/what-we-know

Evidence: Official summary of the historical findings.

Source 12.6 — Church Commissioners, June 2024

Learning from the Past, to Invest in a Better Future.

https://www.churchofengland.org/media/finance-news/learning-past-invest-better-future

Evidence: Gareth Mostyn's account of the research process, institutional reaction and reparatory response.

Source 12.7 — UK Parliament, 22 May 2025

Church Assets: Historical Link to Slavery.

https://hansard.parliament.uk/commons/2025-05-22/debates/2F7DEF1C-70DD-4E51-9962-CE3DCB5694/ChurchAssetsHistoricalLinkToSlavery

Evidence: Parliamentary questions concerning historic profit, asset tracing and institutional wealth.

Source 12.8 — Church of England General Synod proceedings, July 2024

https://www.churchofengland.org/sites/default/files/2024-11/july-group-sessions-2024.pdf

Evidence: Published institutional response to questions challenging aspects of the research.

Source 12.9 — Lambeth Palace Library archival materials

Relevant records include Queen Anne's Bounty ledgers, benefaction registers and associated research documentation.

Access should be established through the Library's official archival catalogue and the Church Commissioners' related documents collection.

Source 12.10 — King's College London

Arthur Burns, *Queen Anne's Bounty: An Introduction*, 2023.

https://kclpure.kcl.ac.uk/portal/en/publications/queen-annes-bounty-an-introduction/

Evidence: Scholarly contribution to the historical background of the Commissioners' research.

END OF SECTION 12 — THE CHURCH COMMISSIONERS' HISTORICAL RESEARCH: QUEEN ANNE'S BOUNTY, THE SOUTH SEA COMPANY, BENEFACTIONS, WEALTH TRANSFER, HISTORICAL VALUATION AND EVIDENTIAL LIMITATIONS

NEXT: SECTION 13 OF 24 — THE £100 MILLION REPARATORY COMMITMENT: ORIGIN, CALCULATION, PURPOSE, AUTHORISATION, STRUCTURE AND THE DISTINCTION BETWEEN INVESTMENT AND COMPENSATION.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 13 OF 24

THE £100 MILLION REPARATORY COMMITMENT: ORIGIN, CALCULATION, PURPOSE, AUTHORISATION, STRUCTURE AND THE DISTINCTION BETWEEN INVESTMENT AND COMPENSATION

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Financial commitment and proposed institutional approach documented; calculation, complete authorisation records, asset transfers, expenditure, beneficiary eligibility and verified reparatory delivery remain under examination.

13.1. Purpose of this section

This section examines the Church Commissioners for England's £100 million commitment associated with Project Spire and the proposed Fund for Healing, Repair and Justice.

Its principal purpose is to establish precisely what the commitment means, how it originated, how the amount was determined, which institution authorised it, what financial mechanisms are proposed and how those mechanisms relate to the delivery of reparatory justice.

The original £100 million announcement is one of the most prominent features of Project Spire.

It has particular significance because it represents a substantial financial commitment arising from the Church Commissioners' acknowledgement of historical connections between Queen Anne's Bounty and African chattel enslavement.

However, an announced amount cannot be treated as equivalent to money received by affected communities.

The programme's proposed financial structure includes investment activity intended to generate continuing social and economic benefits.

It also contemplates grants, further historical research and engagement.

These activities must be distinguished from direct financial compensation to individuals.

RNL's investigation will examine both the legitimacy of the stated objectives and the practical financial consequences.

The underlying question is not simply whether £100 million was announced.

It is **what financial value has been committed, controlled, invested, allocated, transferred and ultimately delivered, to whom, under what authority, and with what verifiable reparatory consequences**.

13.2. The origin of the £100 million commitment

On 10 January 2023, the Church Commissioners announced the publication of their historical research findings and a commitment of £100 million over nine years commencing in 2023.

The announcement followed research into the origins of the Commissioners' endowment, including Queen Anne's Bounty's investments in South Sea Company securities and benefactions associated with historical enslavement.

The Commissioners presented the commitment as part of their response to those findings.

The programme was intended to include an impact investment fund, future grant-making, research and engagement.

The original announcement therefore provides documentary evidence of an institutional commitment.

It does not establish that a separate reparations fund already existed in January 2023.

Nor does it establish that the entire amount had been transferred or distributed.

RNL must preserve the original announcement as the starting point for tracking the financial commitment through subsequent stages of implementation.

Primary source:

Church Commissioners, 10 January 2023:

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

13.3. What the historical evidence establishes about the financial context

Section 12 examined the historical financial evidence underlying Project Spire.

That research identified substantial holdings of South Sea Company-related securities, associated investment income and benefactions potentially connected with African chattel enslavement.

The published material included illustrative present-day comparisons of historical investment values and income.

Those comparisons provide important context for assessing the scale of the institutional response.

However, a historical financial comparison is not automatically equivalent to the amount of reparations legally owed, a sum currently held in a traceable account or the amount that should be distributed under a particular reparatory programme.

The Commissioners' £100 million commitment must therefore be examined as an institutional decision in its own right.

The central question is whether that decision resulted from a documented calculation of historical benefit or from another financial, moral, charitable or policy process.

The existence of substantial historical connections makes the question important.

It does not, by itself, provide the answer.

13.4. Was £100 million calculated from historical financial benefit?

The available official material explains the institutional commitment but does not provide a complete publicly identifiable calculation showing how the specific amount of £100 million was derived from the historic financial transactions examined in Section 12.

That is a significant evidential gap.

The investigation should establish whether the Commissioners prepared any valuation exercise comparing the historical benefit with possible reparatory responses.

It should also determine whether the amount was selected after assessing the resources available within the endowment, the perceived scale of institutional responsibility or other charitable considerations.

Relevant documents may include Board papers, investment committee advice, financial modelling, legal advice and records of consultation.

Some material may be subject to lawful confidentiality protections.

Where disclosure is limited, the Commissioners should be invited to provide a sufficiently detailed public explanation of the decision-making process.

The objective is not to assume that the amount was arbitrarily selected.

It is to establish the actual basis on which it was authorised.

13.5. The Church Commissioners' stated financial context

The Church Commissioners' published FAQs describe the £100 million commitment in relation to the institution's wider financial activities.

The Commissioners state that the commitment represents approximately 1% of the endowment and approximately 3% of their planned distributions over the relevant period.

They also explain that the commitment will be financed from the endowment rather than from individual parish donations.

These statements are important because they describe how the Commissioners publicly justified the commitment within their existing charitable responsibilities.

However, proportional comparisons do not themselves establish how the reparatory sum was calculated.

A figure representing a particular percentage of institutional assets may be financially significant without corresponding to a valuation of historical harm or benefit.

The investigation must therefore distinguish affordability, institutional proportionality and reparatory adequacy.

Each requires a different analysis.

Primary source:

Church Commissioners — Frequently Asked Questions:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

13.6. The original nine-year commitment period

The January 2023 announcement described the £100 million commitment as being delivered over nine years commencing in 2023.

This established an original planning horizon.

However, the term *delivered* requires careful interpretation.

It may refer to institutional expenditure, allocation to an investment vehicle, deployment through investments or other stages of programme implementation.

It does not necessarily mean direct receipt by affected individuals or communities during every year of the period.

The investigation should obtain the original annual funding schedule.

It should identify whether the Commissioners intended equal annual allocations, a phased series of transfers or another financial mechanism.

It should also establish whether the original timetable has been formally amended.

A revised timetable should not be silently substituted for the original commitment.

The historical record must preserve both the initial intention and any subsequent change.

13.7. The Church Commissioners' Board of Governors

The Church Commissioners' Board of Governors holds important institutional responsibility for the programme.

The original financial commitment was publicly described as a decision of the Commissioners' Board.

Subsequent public statements identify the Board's acceptance of the independent Oversight Group's report in November 2023.

The investigation must distinguish the Board's general institutional authority from the authority of individual programme employees, contractors, advisers or external event participants.

This is particularly important because earlier sections established overlapping professional involvement between Project Spire-related work and the GRH launch.

Such involvement does not establish financial authority over the £100 million commitment.

The Commissioners should identify the relevant governing bodies, decision-making procedures and formal delegations.

The objective is to determine who is authorised to commit, invest, allocate or transfer the money.

13.8. The legal basis for authorising the commitment

The Church Commissioners are a charitable institution whose endowment is held and administered under legal obligations.

The proposed use of resources for reparatory purposes has therefore raised questions concerning charitable authority and regulatory approval.

RNL should establish the legal basis relied upon when the Commissioners approved the programme.

This includes identifying whether the commitment was authorised entirely through existing charitable powers or whether further approvals are necessary for particular aspects of implementation.

The investigation must distinguish the original Board decision from subsequent regulatory processes.

An institutional decision to commit funding does not automatically complete every step necessary to establish a new fund or transfer assets into it.

The relevant legal authorities and the Charity Commission should be asked to clarify the status of material approvals where that information is available.

The investigation should not describe a legal obstacle as established unless it is supported by an authoritative record.

13.9. The role of the independent Oversight Group

The independent Oversight Group was established to advise on the structure and purpose of the reparatory response.

Its membership included individuals with experience in historical research, finance, investment, community engagement and reparations.

The Group's recommendations were formally accepted by the Commissioners' Board in November 2023 and published in March 2024.

The Group therefore played an important advisory role.

However, advisory responsibility must be distinguished from final institutional authority.

A recommendation can influence financial policy without constituting a completed authorisation to transfer funds.

The investigation should examine which recommendations were formally accepted, which require further implementation and which have subsequently changed.

It should also obtain the Group's terms of reference and determine whether its responsibilities continue.

13.10. The Oversight Group's assessment that £100 million was insufficient

The Oversight Group's published report stated that the original £100 million commitment was insufficient relative to the scale of historical harm and the Church Commissioners' institutional resources.

It encouraged a substantially larger ambition.

The Group proposed developing the initiative towards £1 billion or more through the participation of other institutions and investment growth.

This recommendation is particularly important because it establishes that questions about the scale of the original commitment arose within the Commissioners' own advisory process.

RNL therefore does not need to invent a dispute about whether £100 million is sufficient.

The published Oversight Group already addressed that question.

However, the recommendation should be distinguished from a binding financial commitment by the Church Commissioners.

The Commissioners' own publicly stated commitment remained £100 million.

The proposed £1 billion ambition was a target for future growth and participation, not money already secured or distributed.

13.11. The distinction between £100 million and £1 billion

The two amounts must not be conflated.

The £100 million represents the Church Commissioners' announced financial commitment.

The £1 billion figure represents a wider ambition for the initiative's eventual scale.

That ambition may depend upon attracting additional institutions, co-investment, reinvestment of returns and future decisions.

The existence of the ambition does not establish that outside funding has been secured.

It also does not establish that the investment fund has achieved that valuation.

The investigation should require separate reporting of confirmed capital, conditional commitments, expressions of interest, investment returns and speculative future targets.

A financial target should not be described as money available to beneficiaries.

The distinction is necessary to protect public understanding.

13.12. The proposed impact investment mechanism

The Church Commissioners' original programme envisaged an impact investment fund intended to support positive social and economic outcomes for communities affected by the legacy of African chattel enslavement.

Impact investing generally involves allocating capital to activities intended to generate measurable social or environmental benefits alongside financial returns.

For Project Spire, the stated aspiration is to develop a fund capable of growing over time while providing lasting benefits.

However, the precise investment policies require examination.

The investigation must identify the intended asset classes, geographic priorities, beneficiary communities, governance arrangements, financial-return expectations and impact measurements.

It should also establish whether affected communities have any ownership, voting or oversight rights concerning the underlying investments.

The existence of a socially beneficial investment objective does not automatically establish reparatory delivery.

The intended benefit must be documented and, where possible, independently verified.

13.13. Investment capital is not compensation

A central distinction concerns the legal and practical nature of investment capital.

If £100 million is invested in businesses or financial instruments, the resulting assets may remain owned by the investment fund.

The investment may generate income, create employment or provide access to capital.

However, those benefits differ from a transfer of ownership or compensation to a person harmed by historical injustice.

The Church Commissioners expressly state that their response is not intended as direct individual compensation.

This is a major feature of the programme.

RNL must therefore assess the initiative against its stated investment and grant-making objectives rather than inaccurately describing it as a direct compensation scheme.

At the same time, it is legitimate to ask why this model was chosen and how affected communities participated in that decision.

An institution's preferred model does not eliminate the possibility of public disagreement about what reparatory justice should involve.

13.14. The distinction between repayable capital and non-repayable grants

An investment may involve a repayable loan, an equity interest or another financial arrangement through which the investing institution expects a financial return.

A grant normally involves a transfer intended to support an approved activity without the same expectation of repayment.

These mechanisms therefore have different implications for recipients.

A loan may require repayment and may expose the borrower to financial risk.

An equity investment may involve shared ownership, investor rights or future profits.

A grant may provide resources without creating a repayment obligation, subject to its conditions.

The investigation should determine which mechanisms Project Spire intends to use.

It should also establish how the programme will prevent reparatory claims from being reduced to ordinary commercial lending without meaningful reparatory benefit.

The appropriate assessment depends upon the actual financial terms.

13.15. How investment returns are intended to support grants

The Commissioners' FAQs explain that successful investments may allow the fund to grow and enable grant-making.

This creates an important financial dependency.

If grants are expected to be financed from investment returns, the timing and scale of grants may depend partly upon investment performance.

The investigation should therefore determine whether the programme intends to make grants immediately, after reaching a specified capital threshold, from annual investment income or through another arrangement.

It should also establish whether grant-making can continue during periods of poor financial performance.

A programme that depends upon future investment growth may offer a different delivery timetable from one that allocates part of its initial capital directly to grants.

Both approaches have potential advantages and limitations.

The investigation must examine the actual arrangements rather than assume a particular model.

13.16. Who bears the financial risks?

Investment involves financial risk.

The value of an asset may rise or fall.

An investment may generate returns, produce no income or result in a loss.

This is particularly important for a reparatory programme because losses may reduce the resources available for future benefits.

The investigation should establish who bears those risks.

If the fund owns the underlying investments, its assets may be exposed to market losses.

If affected community organisations borrow money, they may bear repayment obligations.

If investment capital is committed to enterprises, the terms may affect ownership and control.

The fund should therefore publish appropriate information about investment risk, governance and safeguards.

A clear description of risk is necessary to prevent the amount invested from being confused with a guaranteed amount delivered.

13.17. The priority of Black-led businesses and affected communities

The Oversight Group recommended investment in Black-led businesses and activities addressing education, economic empowerment, health outcomes, access to land and food, and other issues associated with the continuing consequences of enslavement.

These priorities are significant because they seek to connect investment activity with communities affected by historical injustice.

However, the investigation must determine how relevant terms will be defined and applied.

For example, *Black-led* may refer to ownership, executive leadership, community governance or other criteria.

These categories should not be assumed to be identical.

Similarly, the expression *communities affected by the legacy of African chattel enslavement* requires a transparent approach to eligibility.

The investigation should examine how the fund proposes to identify relevant communities and distinguish historical relationship, present-day need and financial eligibility.

13.18. The importance of community ownership and control

The Oversight Group recommended that the programme should ultimately be owned and run by Black communities.

This is a substantial governance recommendation.

It goes beyond consultation alone.

A community may be consulted without controlling decisions.

An organisation may receive grants without possessing ownership rights over the fund.

A programme may appoint Black advisers while leaving final authority with another institution.

These are distinct arrangements.

RNL should therefore establish what the Oversight Group intended by Black ownership and control.

The investigation should determine whether the final structure is intended to transfer legal ownership, trustee appointments, decision-making authority or another form of governance responsibility.

The programme's actual arrangements must be assessed against the published recommendation.

13.19. The question of who represents affected communities

The proposed use of Black leadership and community participation creates important questions about representation.

No individual or organisation automatically represents all people of African descent or all communities affected by enslavement.

The investigation should therefore examine how representatives are selected, whom they are accountable to and whether affected communities can challenge their decisions.

It should also determine how independent grassroots reparations organisations can participate without being required to accept an existing institution's preferred political, cultural or religious position.

The objective is not to impose a single model of representation.

It is to establish whether the proposed governance arrangements are transparent, inclusive and accountable.

The distinction between identity, participation, membership and authority must remain clear.

13.20. The position of independent grassroots reparations organisations

The proposed grant-making and investment programme may be of particular interest to independent grassroots Black/Afrikan reparations organisations.

Some may have contributed decades of unpaid or underfunded work towards historical research, community mobilisation and public understanding.

Others may operate projects concerning education, health, land, cultural heritage or economic empowerment.

However, the existence of a reparations fund does not automatically establish their eligibility for financial support.

The investigation must establish whether a programme of funding applications is available, what criteria will apply and whether organisations will receive adequate information before making decisions.

It should also ask whether smaller organisations will face disproportionate administrative requirements.

These questions concern access, fairness and practical delivery.

13.21. The possibility of exclusion through financial eligibility rules

Funding arrangements may create barriers even where no deliberate exclusion is intended.

An institution may require applicants to possess particular legal structures, audited accounts, reserves, insurance or experience managing large grants.

Such requirements may serve legitimate financial-control purposes.

However, they may also place smaller or longstanding informal community organisations at a disadvantage.

The investigation should therefore assess whether Project Spire's eventual eligibility criteria are proportionate to the funding offered.

It should establish whether alternative arrangements are available for organisations that make valuable community contributions but lack substantial administrative resources.

The relevant concern is not merely whether an application process exists.

It is whether the process is practically accessible to the intended beneficiaries.

13.22. The issue of research and administrative expenditure

The original commitment included investment, research and engagement.

Subsequent programme development has involved research, consultation, governance work and administrative preparation.

Such expenditure may be necessary to establish a lawful and effective reparatory programme.

However, it must be accounted for separately from direct reparatory delivery.

RNL should establish which expenditure is funded within the £100 million commitment and which is financed separately by the Church Commissioners.

The Oversight Group specifically recommended that the initial £100 million be preserved for impact and that relevant operating costs should be met separately during the initial phase.

The investigation should determine whether this recommendation has been adopted and implemented.

A commitment of £100 million for reparatory activity can have a materially different meaning if a significant portion is consumed by administration.

Transparent classification of expenditure is therefore essential.

13.23. The Oversight Group's recommendation concerning operating costs

The Oversight Group's position on operating costs is particularly important.

Its report recommended that the full £100 million should be allocated towards reparatory impact rather than reduced by initial operating expenditure.

The recommended approach was for the Church Commissioners to meet relevant operating expenses separately, at least during the initial stage.

This creates a specific benchmark for evaluating subsequent programme accounts.

The investigation should establish the original decision taken by the Commissioners in response to this recommendation.

It should then determine how costs have actually been charged.

If operating costs have been paid separately, that should be recorded as a documented implementation measure.

If any costs have reduced the committed amount, the institution should explain the basis and authority for doing so.

No adverse conclusion should be reached without examining the accounts.

13.24. The possible involvement of additional funders

The proposed £1 billion ambition depends partly upon potential participation by institutions beyond the Church Commissioners.

The Commissioners' FAQs expressly contemplate co-investment from other organisations with comparable histories.

This creates additional questions about governance and institutional independence.

A fund receiving capital from several institutions may be subject to differing financial expectations, legal obligations and reputational interests.

The investigation should establish whether prospective contributors will possess governance rights or influence over investment policy.

It should also determine whether their contributions are intended as reparatory commitments, commercial investments or a combination of the two.

These distinctions are important.

A commercial co-investment seeking ordinary returns is not automatically a donation or reparations payment.

The fund must clearly describe the legal and financial nature of each contribution.

13.25. The meaning of a perpetual investment model

The Commissioners' public material describes an ambition to develop an investment fund capable of continuing over generations.

A perpetual model generally seeks to maintain and grow capital while using some income or returns to support designated purposes.

Such an approach may provide long-term benefits.

However, it may also raise questions concerning how much value reaches present-day communities.

A programme that preserves most capital for future investment may deliver less immediate financial assistance than a programme making substantial direct grants.

The investigation should therefore establish how the fund balances present needs with future obligations.

It should also examine whether affected communities have been consulted about that balance.

There is no reason to assume that all affected communities share identical preferences.

A transparent programme should explain why its chosen allocation between present and future benefits is considered appropriate.

13.26. The difference between impact claims and verified outcomes

A fund may describe an investment as socially beneficial.

However, a description of intended impact is not the same as independent evidence that the intended benefit occurred.

RNL should therefore seek the criteria used to assess investment impact.

Relevant measures may include actual employment created, ownership retained by affected communities, access to essential services, improved housing or land access, financial returns to beneficiaries and grant-funded outcomes.

These measures should be specific enough to permit independent examination.

The fund should also report unsuccessful investments or projects rather than publishing only favourable examples.

An investment may be undertaken in good faith and nevertheless fail to produce the expected benefits.

Transparent reporting should recognise that possibility.

The central requirement is that claims of reparatory success should be supported by evidence.

13.27. The importance of distinguishing announcement from financial delivery

RNL's financial methodology requires separation of different stages.

The first stage is a public announcement.

The second is a formal financial commitment.

The third is allocation of resources to a particular purpose.

The fourth is actual movement of money or assets.

The fifth is receipt by an identified person, organisation or investment vehicle.

The sixth is independently verified benefit to the intended community.

These stages may occur at different times.

A commitment may remain unallocated.

An allocation may remain untransferred.

A transfer to an investment vehicle may not constitute a grant to an affected community.

A grant may be received without its intended outcomes being achieved.

The investigation must record each stage separately.

This is essential to ensuring that the £100 million figure does not become a substitute for evidence of delivery.

13.28. The present implementation status

The Church Commissioners' official enquiry page states that the proposed Fund for Healing, Repair and Justice remains in its implementation phase, including establishment of the required regulatory framework.

The same page states that the fund is not yet operational.

The FAQs indicate that grant applications are not yet available and that further information will be published once arrangements have been established.

These statements provide an important current qualification to the original £100 million announcement.

They do not establish that no related research, consultation or preparatory expenditure has occurred.

Nor do they conclusively establish the status of every separate financial workstream.

The investigation should therefore obtain a dated implementation statement identifying the progress of governance, regulatory applications, capital commitments, investment operations and grant-making.

The distinction between preparatory activity and operational delivery must remain clear.

13.29. The possible impact of delay

The original announcement was made in January 2023.

The Oversight Group subsequently recommended accelerating the initial nine-year timetable.

As of 18 October 2026, the official information examined continues to describe the fund as not yet operational.

This raises legitimate questions concerning progress and delay.

The investigation should establish what milestones were originally proposed and whether those milestones have been met.

It should seek explanations for outstanding regulatory, governance or operational requirements.

The existence of delay does not itself establish incompetence or wrongdoing.

Complex charitable and financial arrangements may require substantial preparation.

However, public accountability requires transparent information about what has been completed, what remains outstanding and when the institution reasonably expects further progress.

13.30. The relationship between the £100 million commitment and Project Spire research roles

Earlier sections identified Charmaine Simpson's Church Commissioners research and engagement role and Kwesi Ochosi's involvement in Project Spire-related archival work.

These records justify enquiry into the financing and supervision of relevant research activities.

However, the existence of a research appointment does not establish authority over the £100 million commitment.

The investigation must distinguish expenditure on professional research from authority to approve investments or grants.

It should establish which budgets supported the relevant work.

It should also determine whether any such expenditure formed part of the original £100 million commitment or was financed separately.

The purpose is accurate accounting, not the creation of an assumption of misconduct from the existence of paid or commissioned research.

13.31. The relationship between Project Spire and the Global Reparations Hub

The documented overlap of individuals associated with Project Spire-related work and the Global Reparations Hub launch raises questions about possible institutional relationships.

However, the evidence does not establish that the GRH received Project Spire funding.

It does not establish that the GRH has authority over the £100 million commitment.

It does not establish that the Church Commissioners authorised or financed the GRH launch.

These matters require separate documentary verification.

The Church Commissioners should therefore be asked whether any financial, contractual, advisory or governance relationship exists between Project Spire and the GRH.

If no such relationship exists, that should be confirmed.

If a relationship exists, its precise terms and institutional authority should be identified.

RNL's two investigations must remain separate unless documented facts justify specific cross-references.

13.32. The adequacy of the proposed reparatory model

The question of adequacy cannot be answered solely by identifying the nominal amount committed.

A £100 million programme may deliver substantial benefits under an effective investment and grant-making structure.

Conversely, an announced amount may produce limited benefits if implementation is delayed, governance is unclear or the intended communities do not receive meaningful value.

The investigation should therefore assess the programme across several dimensions.

These include the historical basis for the commitment, the amount of capital actually deployed, the participation of affected communities, the accessibility of grants, the terms of investments, the distribution of financial risks and the verification of benefits.

The Oversight Group's recommendation for a substantially larger ambition is relevant evidence of concern about scale.

However, an independent assessment of adequacy requires a clear methodology and actual financial records.

13.33. Safeguards against anti-Black racism and Institutional Racism

RNL seeks evidence that Project Spire's governance and financial decision-making are protected against the possibility of anti-Black racism, racial bias and Institutional Racism.

The concern is particularly important because the programme is intended to address historical harm arising from the exploitation of African people.

Relevant safeguards should be examined across appointments, consultation, investment selection, grant-making, beneficiary eligibility, complaints and independent review.

The existence of a Black-led advisory group does not automatically establish that every institutional process is protected from racial bias.

Nor does asking these questions amount to an allegation that discrimination has occurred.

The investigation must determine what safeguards exist, how they operate and how affected communities can challenge decisions.

A programme concerned with reparatory justice should be able to provide clear written evidence of the institutional protections on which participants may rely.

13.34. Financial transparency as a foundation for peace

The proposed £100 million commitment creates substantial expectations.

Where communities have experienced profound historical injustice, unanswered questions about access to financial resources may generate frustration and mistrust.

RNL considers that transparency, professional organisation and timely communication are essential safeguards for maintaining peace.

The possibility that serious unresolved disputes could contribute to intimidation, threats of violence or violence should be considered as a preventative institutional concern.

This does not mean that violence is expected or inevitable.

Nor does it suggest that the Church Commissioners, Project Spire personnel or affected communities have threatened violence.

The objective is to prevent unnecessary escalation through accessible information, fair procedures and evidence-based resolution of disputes.

Clear financial records are part of that preventative framework.

13.35. The need for an independent financial ledger

RNL should maintain a permanent Project Spire financial ledger distinguishing the original commitment from subsequent activity.

The ledger should record each relevant announcement, authorisation, budget, financial allocation, investment, grant, transfer, expenditure item and independently verified outcome.

Each entry should identify its date, source, responsible institution, financial amount, currency, purpose and evidential status.

Where financial data are unavailable, the ledger should record the information as outstanding rather than inserting estimates.

Where institutional reports are subsequently revised, the original figures and corrections should be preserved.

This approach is consistent with RNL's broader requirement to distinguish promises from delivery.

It also permits a transparent assessment of the programme over time.

The complete ledger should eventually support ordinary readers, financial researchers and affected communities seeking to understand what has occurred.

13.36. Questions concerning origin and calculation

The Church Commissioners should provide written clarification on the following matters.

Question 13.1: Who proposed the original £100 million figure, and when?

Question 13.2: Which committee or governing body formally authorised the commitment?

Question 13.3: What documents record the original decision and its financial rationale?

Question 13.4: Was the amount derived from a calculation of historical financial benefit identified in the forensic research?

Question 13.5: If not, which financial, legal, charitable or policy considerations determined the amount?

Question 13.6: Were alternative amounts considered?

Question 13.7: What consultation with affected communities took place before the original amount was selected?

Question 13.8: What proportion of the Church Commissioners' endowment did the commitment represent at the date of approval?

Question 13.9: Was the commitment approved as a fixed nominal amount or subject to later adjustment for inflation or other considerations?

Question 13.10: Has the Board subsequently reconsidered the amount in response to the Oversight Group's recommendations?

These questions concern the basis and transparency of the original institutional decision.

They are not allegations that the commitment was improperly calculated.

13.37. Questions concerning authorisation and financial structure

Question 13.11: What legal powers support the allocation of Church Commissioners' endowment resources to Project Spire?

Question 13.12: Which regulatory approvals are required, and which have been obtained?

Question 13.13: Has a separate legal fund entity been established?

Question 13.14: If so, what is its registered identity, governing document and trustee structure?

Question 13.15: Who currently owns and controls the financial assets associated with the commitment?

Question 13.16: Has any part of the £100 million been formally transferred to a separate entity or investment vehicle?

Question 13.17: What annual financial schedule was originally approved for the nine-year period?

Question 13.18: Has that schedule been revised?

Question 13.19: What arrangements protect the committed amount from being reduced by initial operating expenditure?

Question 13.20: What financial audit and reporting procedures apply?

These questions seek to establish the actual financial and legal structure.

13.38. Questions concerning investment and grant-making

Question 13.21: What types of financial investment does Project Spire intend to undertake?

Question 13.22: How will eligible Black-led businesses and affected communities be identified?

Question 13.23: What rights will recipients possess concerning ownership, governance and financial returns?

Question 13.24: What financial risks will be borne by the fund and by recipients?

Question 13.25: What proportion of initial capital is intended for investment and what proportion for direct grants?

Question 13.26: Will grants be available before significant investment returns have accumulated?

Question 13.27: What criteria will apply to independent grassroots reparations organisations?

Question 13.28: What safeguards will protect smaller organisations from disproportionate application requirements?

Question 13.29: How will conflicts of interest be managed in funding decisions?

Question 13.30: How will investment impact and reparatory delivery be independently verified?

13.39. Questions concerning implementation and financial accountability

Question 13.31: What amount of the original £100 million has been formally allocated as at 18 October 2026?

Question 13.32: What amount has actually been transferred to an investment vehicle or other legally identified recipient?

Question 13.33: What amount has been spent on research, engagement, administration and governance preparation?

Question 13.34: Which expenditure was charged within the original £100 million commitment?

Question 13.35: What amount, if any, has been received by affected community organisations as non-repayable grants?

Question 13.36: What amount has been invested in identifiable businesses or projects?

Question 13.37: Which investments have generated verified social or economic benefits?

Question 13.38: What financial losses, risks or unsuccessful projects have been recorded?

Question 13.39: What verified commitments have been received from additional institutions towards the £1 billion ambition?

Question 13.40: What implementation milestones remain outstanding, and what revised timetable has been approved?

These questions are necessary to distinguish a public commitment from actual reparatory delivery.

13.40. Questions concerning safeguards and public accountability

Question 13.41: What safeguards exist against the possibility of anti-Black racism and Institutional Racism in investment and grant-making decisions?

Question 13.42: How can affected communities challenge eligibility or allocation decisions?

Question 13.43: What independent complaints or appeals procedures will be available?

Question 13.44: Will beneficiary-selection criteria and reasons for decisions be published?

Question 13.45: What public information will be available concerning management fees, administration, consultants and other programme expenditure?

Question 13.46: How will the programme disclose and manage potential conflicts involving professional, organisational or financial relationships?

Question 13.47: What mechanisms will enable grassroots organisations to participate in governance without surrendering their independence?

Question 13.48: What written procedures address serious grievances and the prevention of intimidation, threats of violence or other conflict?

Question 13.49: What evidence establishes any formal relationship between Project Spire and the Global Reparations Hub?

Question 13.50: Will the Church Commissioners provide a comprehensive written financial reconciliation of the commitment from January 2023 to the latest available reporting date?

These questions should form part of RNL's permanent investigative reference record.

They may be grouped into shorter correspondence where necessary for clarity, but their substantive purpose should not be abandoned merely because a shorter presentation is preferred.

13.41. Preliminary evidential assessment

The investigation establishes that the Church Commissioners announced a £100 million commitment in January 2023 as part of their response to historical financial connections with African chattel enslavement.

The commitment was intended to operate over nine years and support investment, research and engagement.

The independent Oversight Group subsequently recommended a substantially greater long-term ambition, including a target of £1 billion or more.

The Commissioners' public material distinguishes their £100 million commitment from that wider ambition.

The proposed financial model centres upon impact investment intended to generate continuing benefits and support future grants.

The Commissioners expressly state that their response is not a programme of direct individual compensation.

The Oversight Group also recommended that the full £100 million should be preserved for impact rather than reduced by initial operating costs.

The official information examined as at 18 October 2026 describes the proposed fund as not yet operational.

These findings establish the programme's publicly stated purpose and important elements of its proposed structure.

However, the documents examined do not provide a complete transaction-by-transaction reconciliation showing how much of the commitment has been formally allocated, invested, transferred or received by ultimate beneficiaries.

That remains a central outstanding requirement.

13.42. Conclusion: the £100 million must be followed from commitment to verified delivery

The £100 million commitment is a significant element of the Church Commissioners' proposed reparatory response.

Its historical background is documented.

Its original announcement is documented.

Its intended emphasis upon impact investment, research and engagement is documented.

The Oversight Group's recommendations concerning a larger ambition, Black community leadership, grant-making and financial structure are documented.

However, these documents do not eliminate the need for rigorous financial accountability.

The amount must be followed through each stage of implementation.

RNL must establish who authorised it, how it was calculated, where it is held, what has been allocated, what has been invested, what has been transferred and what benefits have reached affected communities.

The distinction between investment capital and direct compensation must remain central.

An investment may create benefits without transferring ownership of the underlying capital to those affected by historical injustice.

A grant may provide direct financial resources, but only where it has actually been awarded and received.

A promised benefit must not be confused with an independently verified outcome.

The wider £1 billion ambition must also remain separate from the Commissioners' original commitment until additional funding and investment growth have been established through documentary evidence.

The central conclusion of Section 13 is that the £100 million commitment is an established institutional undertaking, but its calculation, detailed authorisation,

complete financial structure and actual reparatory delivery require further documentary examination.

RNL will continue to pursue that examination independently, professionally and without arbitrary restrictions on investigative scope.

The objective is not simply to determine whether the Church Commissioners have announced reparatory intentions.

It is to establish whether those intentions are translated into transparent, accountable and independently verifiable reparatory justice.

SECTION 13 — FINANCIAL EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-13-001	Original £100 million commitment announced in January 2023	Official institutional record
SPIRE-13-002	Original delivery period of nine years from 2023	Official announcement
SPIRE-13-003	Funding intended from Church Commissioners' endowment	Official explanation
SPIRE-13-004	Commitment described as approximately 1% of endowment	Official contextual statement
SPIRE-13-005	Original impact investment, research and engagement purposes	Official programme description
SPIRE-13-006	Oversight Group appointed in 2023	Official record
SPIRE-13-007	Oversight Group recommends £1 billion-plus ambition	Published recommendations
SPIRE-13-008	Commissioners' own commitment remains £100 million	Official FAQ
SPIRE-13-009	Programme not intended as direct individual compensation	Official FAQ

SPIRE-13-010	Proposed grants supported through fund activity	Official programme explanation
SPIRE-13-011	Recommendation to preserve full initial capital for impact	Oversight Group recommendation
SPIRE-13-012	Recommendation for eventual Black community ownership and leadership	Oversight Group report
SPIRE-13-013	Proposed fund not yet operational	Official implementation statement
SPIRE-13-014	Complete financial rationale for choosing £100 million	Further clarification required
SPIRE-13-015	Formal regulatory approvals and current legal structure	Further verification required
SPIRE-13-016	Exact capital allocated and transferred	Complete reconciliation outstanding
SPIRE-13-017	Expenditure charged within or outside the commitment	Complete reconciliation outstanding
SPIRE-13-018	Grants and reparatory benefits actually received	Independent verification outstanding
SPIRE-13-019	Secured external funding towards £1 billion ambition	Verification required
SPIRE-13-020	Financial relationship between Project Spire and GRH	Not established

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SOURCES AND INDEPENDENT VERIFICATION

Source 13.1 — Church Commissioners, 10 January 2023

Full historical research and announcement of the £100 million commitment.

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Purpose: Original financial commitment, timetable and programme objectives.

Source 13.2 — Church Commissioners, 10 May 2023

Recruitment of Oversight Group for the proposed impact investment fund.

https://www.churchofengland.org/media/press-releases/church-commissioners-starts-recruitment-oversight-group-new-impact-investment

Purpose: Original scope of the advisory process.

Source 13.3 — Church Commissioners, 24 July 2023

Appointment of the Oversight Group.

https://www.churchofengland.org/media/press-releases/church-commissioners-announce-members-oversight-group-advise-response-historic

Purpose: Historical membership and advisory responsibilities.

Source 13.4 — Church Commissioners, 4 March 2024

Response to Oversight Group recommendations.

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

Purpose: Fund structure, recommended £1 billion-plus ambition, Black leadership, investment and grant-making.

Source 13.5 — Oversight Group report

Fund for Healing, Repair and Justice: Recommendations to the Church Commissioners.

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Purpose: Original recommendations concerning capital, costs, governance, grant-making, investment, consultation and reparatory objectives.

Source 13.6 — Church Commissioners FAQs

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Purpose: Clarification of the £100 million commitment, £1 billion ambition, investment model, funding source, compensation distinction and grant applications.

Source 13.7 — Church Commissioners, March 2025

From Commitment to Action: Our Continuing Journey.

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

Purpose: Implementation workstreams, governance development, investment planning and grant-making preparation.

Source 13.8 — Official implementation status

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Purpose: Current description of the implementation phase and statement that the fund is not yet operational.

Source 13.9 — Church Commissioners' full research documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Purpose: Historical evidence, Oversight Group terms of reference and original institutional documents.

Source 13.10 — Fund for Healing, Repair and Justice

https://hrjfund.org/

Purpose: Public information concerning the fund's development and proposed institutional structure.

END OF SECTION 13 — THE £100 MILLION REPARATORY COMMITMENT: ORIGIN, CALCULATION, PURPOSE, AUTHORISATION, STRUCTURE AND THE DISTINCTION BETWEEN INVESTMENT AND COMPENSATION

NEXT: SECTION 14 OF 24 — FINANCIAL SCALE AND ADEQUACY: THE £100 MILLION COMMITMENT, THE £1 BILLION AMBITION, THE CHURCH COMMISSIONERS' ENDOWMENT, HISTORICAL FINANCIAL BENEFIT AND THE MEASUREMENT OF REPARATORY JUSTICE.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 14 OF 24

FINANCIAL SCALE AND ADEQUACY: THE £100 MILLION COMMITMENT, THE £1 BILLION AMBITION, THE CHURCH COMMISSIONERS' ENDOWMENT, HISTORICAL FINANCIAL BENEFIT AND THE MEASUREMENT OF REPARATORY JUSTICE

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Institutional financial figures and stated commitments documented. The adequacy of the response, financial deployment, valuation methodology and independently verified reparatory outcomes remain under investigation.

14.1. Purpose of this section

This section examines the financial scale of Project Spire and the proposed Fund for Healing, Repair and Justice.

It considers the Church Commissioners' original £100 million commitment, the Oversight Group's recommendation for a much larger programme, the size of the Commissioners' endowment, the historical financial evidence concerning African chattel enslavement and the criteria by which a reparatory response should be assessed.

The primary purpose is to distinguish financial capacity from financial commitment, financial commitment from actual deployment and financial deployment from independently verified reparatory outcomes.

These distinctions are essential because the public presentation of a large financial figure may create expectations that are not equivalent to the programme's legal or operational position.

RNL also seeks to examine whether the amount committed was determined through a transparent assessment of historical benefit, institutional financial capacity, reparatory objectives or another process.

The investigation will not assume that a particular amount is sufficient merely because the institution considers it significant.

Equally, it will not declare the commitment inadequate without identifying the criteria and evidence supporting that assessment.

Financial adequacy must be considered in relation to the historical responsibility acknowledged, the intended beneficiaries, the mechanism of delivery, the time required and the extent of independently verified benefit.

14.2. The five principal financial figures

The investigation must maintain a clear distinction between five frequently discussed financial measures.

Financial measure	Amount	Meaning
Church Commissioners' original commitment	£100 million	Institutional commitment to the reparatory response
Wider ambition supported by the Oversight Group	£1 billion or more	Proposed future scale, not an additional Commissioners' commitment
Commissioners' endowment at end of 2024	£11.1 billion	Historical reporting-date valuation
Commissioners' endowment at end of 2025	£11.6 billion	More recent published reporting-date valuation
Illustrative modern equivalents of historical South Sea Company investment and income	Approximately £443 million and £1.4 billion	Historical financial comparison estimates, not verified modern assets or compensation awards

These amounts describe fundamentally different matters.

They must not be added together or compared without explaining their nature, date and calculation method.

The £100 million is a stated commitment.

The £1 billion is an ambition.

The endowment figures represent institutional asset valuations.

The historical equivalents seek to illustrate the financial significance of past transactions.

None of these amounts, by itself, establishes what has been received by affected communities.

14.3. The latest documented endowment valuation

On 25 May 2026, the Church Commissioners published their financial results for 2025.

They reported that the endowment had reached £11.6 billion at 31 December 2025.

The report identified an 8% investment return during 2025.

It also described the endowment's role in providing continuing financial support for the Church of England.

This valuation is important because it supplies a more recent benchmark than the £11.1 billion figure quoted in some earlier publications.

However, an endowment valuation is a reporting-date measure.

It does not establish the amount of immediately available cash.

The portfolio may contain investments with different liquidity, risk and legal restrictions.

The investigation must therefore distinguish the total value of investments from unrestricted financial resources available for immediate distribution.

The £11.6 billion figure provides an institutional-scale benchmark, not a complete assessment of the Commissioners' legal or practical capacity to allocate additional money.

Primary source:

Church Commissioners — Financial results for 2025, published 25 May 2026:

https://www.churchofengland.org/media/finance-news/church-commissioners-england-endowment-fund-delivers-8-return-2025

14.4. The £100 million commitment relative to the endowment

The Church Commissioners' official FAQs describe their £100 million commitment as equivalent to approximately 1% of the endowment.

That statement provides a useful indication of proportional scale.

However, the percentage alone does not determine adequacy.

A contribution may represent a relatively small proportion of a very large institution's assets while still amounting to substantial financial resources in absolute terms.

Conversely, a large nominal commitment may prove inadequate if it does not produce meaningful benefits for the people and communities it is intended to assist.

The investigation should therefore examine how the Commissioners considered proportionality.

It should determine whether the Board assessed alternative levels of commitment and how it balanced reparatory objectives with its wider charitable responsibilities.

The financial reasoning must be assessed against the evidence rather than presumed.

14.5. The Commissioners' other financial obligations

The Church Commissioners manage an endowment intended to support the Church of England over the long term.

Their financial obligations include ongoing distributions for ministry and other institutional purposes.

The original £100 million commitment was announced alongside plans to distribute approximately £3.6 billion in support of the Church between 2023 and 2031.

The Commissioners described the reparatory commitment as approximately 3% of those planned distributions.

This comparison helps explain the institution's stated approach to financial proportionality.

However, ordinary Church expenditure and Project Spire expenditure have different purposes.

They should not be conflated.

The investigation should establish whether particular obligations are legally restricted, contractually committed or subject to discretionary review.

Only then can financial capacity and alternative allocations be properly assessed.

14.6. The Church Commissioners' explanation for selecting £100 million

The Commissioners have stated that their Board considered £100 million an appropriate commitment.

Their explanation refers to the need for a meaningful reparatory response while maintaining financial support for the Church's wider mission and ministry.

They also indicate that they considered responses adopted by other organisations.

This provides an identifiable institutional rationale.

However, the public explanation does not fully demonstrate whether the amount was calculated through a detailed valuation of historical financial benefit.

Nor does it provide a complete comparison of alternative sums considered by the Board.

These remain appropriate subjects for documentary enquiry.

The investigation should seek a clear explanation of the decision-making process, including relevant criteria and any financial modelling that can lawfully be disclosed.

14.7. The Oversight Group's assessment of insufficiency

The independent Oversight Group reached an important conclusion concerning the original amount.

Its March 2024 report regarded £100 million as insufficient in light of the Church Commissioners' financial resources and the historical gravity of African chattel enslavement.

This assessment should be clearly recorded.

It demonstrates that questions about the programme's scale arose within the Commissioners' own advisory process.

However, the Group's assessment is not identical to a final legal or financial determination of what the Commissioners must pay.

It is an advisory judgement concerning reparatory ambition and adequacy.

The investigation should examine the reasons offered by the Group and whether the Church Commissioners provided a substantive response to each material recommendation.

A professional assessment should distinguish the advisory criticism from RNL's eventual independently supported conclusions.

14.8. The proposal for a £1 billion-plus initiative

The Oversight Group recommended developing the initiative towards a scale of £1 billion or more.

The proposal contemplated further institutional participation and the potential growth of investment capital.

Its significance is that it identified the need for a larger, more ambitious reparatory programme.

However, the proposal did not increase the Church Commissioners' own commitment from £100 million to £1 billion.

The Commissioners expressly clarified that their contribution remained unchanged.

Their stated intention was to encourage additional participants and develop a fund capable of increasing its scale.

The investigation must therefore avoid presenting the £1 billion ambition as money already committed, collected, invested or distributed.

Such a description would materially distort the financial position.

14.9. What would be required to establish £1 billion in actual resources?

A future fund of £1 billion could arise through several different processes.

Additional institutions might make legally enforceable commitments.

Existing investors might contribute new capital.

The fund might generate and retain investment returns.

Other assets might be transferred.

These possibilities have different financial meanings.

A signed investment agreement differs from a non-binding expression of support.

An expected investment return differs from a realised gain.

An increase in the market value of investments differs from a cash contribution.

The investigation must therefore identify the precise sources of any additional capital.

No amount should be described as secured unless documentary evidence supports that status.

The proposed £1 billion target should remain recorded separately from actual assets.

14.10. The difference between institutional capacity and reparatory entitlement

The size of the Church Commissioners' endowment is relevant to financial capacity.

However, it does not automatically determine what sum a particular affected person or organisation is legally entitled to receive.

Entitlement may depend upon the purpose of the programme, applicable law, eligibility criteria and any independently established claim.

Institutional financial capacity and reparatory entitlement are therefore separate questions.

Nevertheless, the size of the endowment is relevant when considering whether a voluntary institutional response is proportionate to acknowledged historical responsibility.

The investigation should examine both dimensions.

It should not substitute the endowment valuation for a calculation of reparatory liability.

Nor should institutional commitments to other purposes automatically end the enquiry into whether a greater reparatory response is practicable.

14.11. The significance of the historical financial evidence

Section 12 examined the historical investment evidence associated with Queen Anne's Bounty.

The published research identified substantial South Sea Company-related holdings and income.

Illustrative modern comparisons included approximately £443 million in relation to holdings recorded for 1739.

Grant Thornton also described an approximately £1.4 billion modern equivalent for income generated by relevant investments.

These figures warrant scrutiny.

However, they must not be treated as interchangeable with the Commissioners' present endowment or their proposed financial commitment.

They describe historical financial activity using specified conversion methods.

The investigation must examine the original values, dates, assumptions and meaning of each comparison.

Only then can an informed discussion of historical financial scale take place.

14.12. Why historical monetary equivalents require careful treatment

Different methods of converting historical money into contemporary terms can produce substantially different results.

A purchasing-power comparison may describe the changing cost of goods and services.

A wages-based comparison may describe the relative command over labour.

A relative economic-share measure may reflect the size of a historical sum within the wider economy.

An assumed investment-growth calculation may attempt to estimate how an amount might have accumulated over time.

These measures do not answer the same question.

The selection of a method must therefore be justified.

The investigation should not choose whichever historical conversion produces the largest amount without explaining its purpose.

Equally, it should not dismiss large historical comparisons merely because they do not represent directly traceable contemporary assets.

The relevant measure depends upon the question being asked.

14.13. The £443 million figure

The historical research identified approximately £204,000 in South Sea Company-related investment holdings in 1739.

It provided an illustrative contemporary equivalent of approximately £443 million.

The significance of this figure is that it conveys the substantial historical scale of the Bounty's investment holdings.

However, it is not a valuation of a surviving modern investment account.

It is not a demonstrated sum currently available for distribution.

Nor does it establish the amount of net profit directly derived from enslaved labour.

The investigation should examine the original calculation, the type of securities held and the economic context.

These are necessary steps before using the figure in any assessment of reparatory adequacy.

14.14. The £1.4 billion historical income comparison

Grant Thornton's account identifies approximately £1.4 billion as a modern equivalent of historical income associated with the South Sea Company investments.

This is a different financial concept from the value of securities held at a particular date.

Income received over time cannot be treated as identical to investment principal.

Nor should the comparative value be automatically added to the £443 million figure.

A valid combined analysis would require a detailed methodology accounting for dates, overlapping transactions and the purpose of the calculation.

The investigation should obtain the original worksheets or a clear published methodological explanation.

Without that information, the figures should remain separate.

14.15. The limitations of tracing historical financial benefit

The original research examined selected benefactions and attempted to trace associated property assets.

The investigators reported that many of the relevant properties had been sold.

Their tracing exercise generally did not continue through subsequent sale proceeds.

This limits what can be concluded about the survival of particular historical assets.

However, the sale of an original property does not logically establish that its proceeds produced no further institutional benefit.

Those proceeds may have been spent, reinvested or otherwise used.

The correct answer depends upon the available records.

The investigation should therefore examine whether additional tracing is possible.

It must also recognise that incomplete historical records may prevent a complete reconstruction.

Such limitations should be recorded as limitations, not replaced with assumptions.

14.16. Can the £100 million be compared directly with historical benefit?

A direct comparison is possible only if the investigator defines precisely what is being compared.

For example, the proposed £100 million commitment is a nominal institutional amount associated with a specific contemporary programme.

The historical equivalents are estimates constructed using particular monetary indices.

One measure may concern assets at a historical date.

Another may concern cumulative income over decades.

Without a common methodology, a simple comparison of headline figures may mislead readers.

The investigation should therefore develop a comparison framework that distinguishes historical principal, historical income, present institutional wealth and intended reparatory capital.

It should then explain what conclusions can and cannot be supported.

The existence of complex measurement questions should not prevent scrutiny.

It requires greater precision.

14.17. Financial adequacy cannot be measured by money alone

Reparatory justice may involve financial transfers, institutional acknowledgement, education, access to land, cultural restoration, community empowerment and structural changes.

The Church Commissioners' programme includes investment, research and engagement.

It is therefore appropriate to examine whether the initiative produces different forms of reparatory value.

However, non-financial benefits should not automatically be treated as substitutes for financial repair.

Historical acknowledgement may be meaningful without providing economic resources.

Education may support long-term change without compensating identifiable losses.

Investment may create opportunities while retaining capital ownership elsewhere.

The investigation should assess these dimensions separately before considering their combined effectiveness.

14.18. The distinction between charitable benefit and reparatory justice

A charitable activity may benefit a community without being directly connected to a recognised historical wrong.

Reparatory justice involves a more specific relationship between harm, responsibility and the proposed remedy.

This distinction is important to Project Spire.

An investment in an enterprise may generate employment or commercial returns.

However, a claim that it constitutes reparatory justice should be supported by an explanation of how the investment addresses the consequences of African chattel enslavement.

The investigation should identify the programme's reparatory criteria.

It should establish whether the intended beneficiaries participate in defining the harms to be addressed.

It should also determine whether reparatory outcomes are measured differently from ordinary investment outcomes.

Without such distinctions, the programme's effectiveness may become difficult to assess.

14.19. Measuring benefit to affected communities

The investigation should examine whether Project Spire has developed clear measures of benefit.

A financial investment might support enterprises owned or controlled by affected communities.

A grant might finance historical research, health initiatives, cultural projects or other community activities.

The relevant outcomes should be identifiable.

For example, the programme might measure actual grants received, ownership acquired, jobs created, services delivered, land access improved or additional resources controlled by community institutions.

However, none of these outcomes should be presented as achieved merely because they are conceivable.

The investigation must obtain evidence of actual activity and delivery.

The fund should report intended outcomes and verified outcomes separately.

14.20. The importance of identifying the ultimate recipient

One of the principal difficulties in financial accountability is identifying who ultimately receives value.

Money may be transferred from the Church Commissioners to an investment vehicle.

The investment vehicle may purchase an interest in a commercial enterprise.

The enterprise may then undertake activities expected to benefit a community.

These are several distinct transactions.

The ultimate reparatory beneficiary may not be the same person or organisation as the immediate recipient of the investment capital.

RNL should therefore distinguish financial intermediaries from final beneficiaries.

The investigation should seek evidence of how value moves through the structure and what benefits are actually realised.

A transfer to a fund should not automatically be counted as a transfer to an affected community.

14.21. Ownership, control and long-term economic benefit

The ownership of assets is an important consideration.

A fund may invest in an enterprise while retaining a substantial ownership stake.

Such an arrangement may support economic activity without transferring control to the communities whose interests it seeks to advance.

Conversely, a programme may enable community enterprises to acquire productive assets, improve financial stability or increase ownership.

The investigation should therefore examine both financial benefit and control.

It should ask whether beneficiaries gain ownership rights, decision-making authority, income or other durable forms of economic power.

This is particularly relevant to the Oversight Group's recommendation that the programme should ultimately be Black community-owned and led.

A governance aspiration must be distinguished from an implemented transfer of authority.

14.22. The question of immediate versus long-term benefit

The Commissioners' proposed investment approach emphasises continuing positive impact over time.

The ambition to preserve and grow capital may support future generations.

However, affected communities also face present-day needs.

The investigation should therefore examine how Project Spire balances immediate grants or assistance with long-term investment.

A programme intended to operate over generations may reasonably adopt a different financial approach from a one-time compensation scheme.

Nevertheless, the balance should be explained and supported by consultation with affected communities.

It should not be assumed that future investment growth automatically provides an adequate response to present needs.

The investigation should identify when beneficiaries may reasonably expect actual benefits.

14.23. The question of inflation and delayed deployment

The original commitment was announced in January 2023.

Where a nominal amount remains unchanged over several years, its purchasing power may change.

The investigation should therefore examine whether the £100 million commitment is fixed in nominal terms or subject to any inflation adjustment.

It should also distinguish the effects of inflation from investment returns that may occur after capital is deployed.

A delay in establishing the fund can affect when communities receive benefits.

However, the financial consequences of delay cannot be established without information concerning capital allocation, investment performance, inflation and implementation costs.

RNL should request a documented analysis rather than produce an unsupported estimate.

14.24. Operating expenditure and the integrity of the commitment

The Oversight Group recommended protecting the original £100 million for reparatory impact, with initial operating costs met separately by the Church Commissioners.

This recommendation is important because professional services, governance preparation, legal work, research and administration may involve substantial expenditure.

Such expenditure can be necessary.

However, the financial treatment of those costs must be transparent.

The investigation should determine whether they have been charged against the £100 million or funded from separate institutional budgets.

It should also establish what amounts have been spent and whether relevant services were procured through appropriate procedures.

A programme's publicly announced capital may be materially affected if operating costs are deducted from it.

The original recommendation provides a clear benchmark for assessing the Commissioners' implementation decisions.

14.25. Project Spire-related research expenditure

Published parliamentary and institutional material indicates that expenditure has occurred in connection with historical research and programme development.

Such expenditure must be recorded separately from reparatory grants and investments.

The investigation should seek a complete schedule identifying relevant contracts, research commissions, staff expenditure, professional fees and programme-development costs.

The purpose is not to presume that such expenditure was improper.

Historical research and lawful programme establishment may require qualified professionals.

The appropriate questions concern authorisation, value for money, transparency and the connection between expenditure and programme objectives.

RNL should avoid treating the cost of producing research as money already delivered in reparations unless the programme clearly identifies the activity as a reparatory benefit and explains the basis for that classification.

14.26. Community involvement in defining adequacy

The adequacy of a reparatory response cannot be assessed exclusively through the preferences of the institution providing resources.

Affected communities may have different views about compensation, investment, collective benefit, cultural restoration and governance.

Some may prioritise direct material assistance.

Others may favour long-term institutional investment or community ownership.

The investigation should therefore examine whether the Church Commissioners sought sufficiently broad and meaningful participation in determining the form and scale of their proposed response.

It should identify which organisations and communities were consulted.

It should also determine whether alternative proposals were considered and how disagreements were recorded.

Consultation should not be confused with unanimous consent.

Nor should participation by selected advisers automatically be treated as authorisation to represent every affected person.

14.27. The position of independent grassroots reparations organisations

Independent grassroots reparations organisations may have played important roles in preserving historical knowledge and advancing public discussion of reparatory justice.

The proposed fund may therefore attract interest from organisations seeking financial or institutional support.

However, eligibility cannot be assumed.

The investigation should determine whether Project Spire's eventual arrangements will permit applications from small organisations, unincorporated associations or groups with limited financial resources.

It should also examine whether application requirements are proportionate.

A nominally open programme may be difficult for some grassroots organisations to access if it requires administrative resources beyond their capacity.

The investigation should seek evidence of measures intended to prevent unnecessary exclusion while maintaining legitimate financial safeguards.

14.28. Institutional obligations and competing priorities

The Church Commissioners have stated that their financial decisions must take account of continuing commitments to the Church of England.

This is a relevant institutional consideration.

However, the existence of competing priorities does not automatically establish that the selected reparatory amount is adequate.

The investigation should examine how the Commissioners evaluated different options and the consequences of each.

It should determine whether additional financial commitments were considered and what reasons were given for accepting or rejecting them.

The purpose is not to disregard the Commissioners' legal responsibilities.

It is to understand how those responsibilities were interpreted and applied when determining the scale of Project Spire.

Where legal restrictions are cited, the institution should identify the relevant rules.

14.29. Transparency concerning the proposed £1 billion fund

The Oversight Group's larger ambition introduces additional questions about external participation.

If other institutions contribute resources, the programme may become more complex.

Different contributors may possess separate historical responsibilities and financial objectives.

The investigation should therefore seek clarity about whether contributions are donations, investments, loans or other arrangements.

It should also establish whether contributors receive rights concerning governance, investment policy or financial returns.

A larger fund is not necessarily more reparatory merely because its nominal asset value increases.

The nature of the contributions and the resulting benefits matter.

The financial reports should distinguish the Church Commissioners' own contribution from all additional sources.

14.30. The danger of counting the same financial value more than once

Complex financial structures can create a risk of double counting.

For example, a capital commitment may be recorded when announced, again when transferred to a fund and again when invested.

Those entries concern successive stages of the same resources.

They do not represent three independent contributions.

Similarly, investment income that is reinvested should not automatically be counted as a separate reparatory grant.

A grant funded from investment returns should be identified as such.

RNL's financial ledger should distinguish transactions and eliminate inappropriate duplication.

This is essential if the eventual report is to provide a reliable account of reparatory delivery.

14.31. Safeguards against anti-Black racism and Institutional Racism

RNL seeks documentary evidence that Project Spire's financial decision-making includes safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism.

The investigation must consider whether eligibility, investment priorities, appointments, consultation and grant-making are subject to appropriate protections.

The question is particularly important where the fund is intended to benefit communities affected by the historical exploitation of African people.

Relevant evidence may include equality policies, independent complaints procedures, transparent decision criteria, conflict-of-interest requirements and methods for reviewing decisions.

The existence of a fund described as reparatory does not automatically establish that its operation is protected against every form of institutional bias.

Nor does asking these questions constitute a finding that discrimination has occurred.

The objective is evidence of effective safeguards.

14.32. Financial transparency and the prevention of violence

RNL maintains that transparency, professional organisation and effective communication are preventative foundations for peace.

Reparatory justice involves historical suffering, contested interpretations of responsibility and potentially substantial financial resources.

Where funding amounts are widely publicised but access, authority and actual delivery remain unclear, misunderstandings may arise.

Such misunderstandings can contribute to distrust and serious disputes.

The possibility of intimidation, threats of violence or violence should therefore be considered within responsible preventative planning.

This is not a prediction that violence will occur.

Nor does it attribute violent intentions to the Church Commissioners, Project Spire personnel or affected communities.

The investigation advocates lawful, peaceful and evidence-based methods.

Its preventative approach is to establish the facts early and provide fair procedures for addressing grievances.

14.33. An independently verifiable financial adequacy framework

RNL should assess Project Spire through several distinct tests.

The first concerns **historical responsibility**: what financial connections have been documented, and what limitations remain?

The second concerns **institutional capacity**: what financial resources and legal powers are available?

The third concerns **proportionality**: how was the size of the commitment selected, and were reasonable alternatives considered?

The fourth concerns **programme design**: how are the intended remedies connected with the historical harm?

The fifth concerns **participation**: how have affected communities influenced decisions?

The sixth concerns **financial delivery**: what resources have actually been allocated, invested, transferred or paid?

The seventh concerns **verified outcomes**: what demonstrable benefits have reached intended beneficiaries?

The eighth concerns **governance and safeguards**: can decisions be scrutinised, challenged and corrected?

An assessment limited to one of these dimensions would be incomplete.

14.34. Priority questions concerning financial scale

Question 14.1: What exact endowment valuation did the Commissioners use when approving the £100 million commitment in January 2023?

Question 14.2: What financial forecasts supported the decision?

Question 14.3: What alternative reparatory amounts were considered?

Question 14.4: Why was £100 million selected rather than a greater or smaller amount?

Question 14.5: What weight was given to the historical financial evidence?

Question 14.6: What weight was given to the Commissioners' wider charitable obligations?

Question 14.7: Was the figure intended to represent a proportion of historical financial benefit or institutional capacity?

Question 14.8: Has the Board reconsidered the commitment following the Oversight Group's conclusion that it was insufficient?

Question 14.9: Has the institution considered an inflation adjustment?

Question 14.10: Will the Commissioners publish the financial reasoning supporting their decision?

14.35. Priority questions concerning the £1 billion ambition

Question 14.11: What formal decision was made concerning the Oversight Group's proposed £1 billion-plus ambition?

Question 14.12: What contributions beyond the original £100 million have been legally committed?

Question 14.13: Which institutions have made those commitments, if any?

Question 14.14: Are potential external contributions intended as investments, grants, donations or another form of capital?

Question 14.15: What financial-return or governance rights will external contributors receive?

Question 14.16: What assumptions about investment growth are used to support the wider ambition?

Question 14.17: What timetable is proposed for achieving that ambition?

Question 14.18: How will the institution distinguish secured capital from projected future resources?

Question 14.19: What proportion of any enlarged fund is intended to reach affected communities as grants or other direct benefits?

Question 14.20: What arrangements prevent the enlargement of the investment fund from being mistaken for enlargement of direct reparatory delivery?

14.36. Priority questions concerning adequacy and beneficiaries

Question 14.21: What definition of reparatory adequacy has Project Spire adopted?

Question 14.22: How were affected communities involved in developing that definition?

Question 14.23: How does the programme distinguish ordinary investment benefit from specifically reparatory benefit?

Question 14.24: What historical or other criteria will identify eligible communities?

Question 14.25: Will affected individuals receive any direct financial compensation?

Question 14.26: If not, what reasons support that decision?

Question 14.27: What direct grant-making arrangements are proposed?

Question 14.28: How will independent grassroots organisations gain access?

Question 14.29: What measures will prevent administrative requirements from unfairly excluding smaller organisations?

Question 14.30: How will beneficiaries participate in reviewing the programme's adequacy?

14.37. Priority questions concerning financial delivery

Question 14.31: What amount of the £100 million has been formally allocated to identifiable purposes?

Question 14.32: What amount has actually been transferred?

Question 14.33: What amount has been invested?

Question 14.34: What amount has been paid as non-repayable grants?

Question 14.35: What amount has been spent on administration, research, consultancy and programme development?

Question 14.36: Which of those costs were charged within the £100 million commitment?

Question 14.37: What investment returns have been realised, if any?

Question 14.38: What financial losses have occurred, if any?

Question 14.39: What independently verified benefits have reached intended communities?

Question 14.40: Will the Commissioners publish an annual reconciliation distinguishing commitments, allocations, expenditure, investment assets and verified reparatory outcomes?

14.38. Questions concerning safeguards and accountability

Question 14.41: What safeguards exist against the possibility of anti-Black racism and Institutional Racism affecting financial decisions?

Question 14.42: Who independently reviews beneficiary-selection criteria?

Question 14.43: How are conflicts of interest disclosed and managed?

Question 14.44: What rights do affected communities possess to challenge funding decisions?

Question 14.45: Will unsuccessful applicants receive written reasons?

Question 14.46: What financial information will be publicly accessible?

Question 14.47: Who audits the proposed fund and any related entities?

Question 14.48: What safeguards prevent double counting of financial commitments and outcomes?

Question 14.49: How will the programme respond to serious complaints and prevent avoidable escalation of disputes?

Question 14.50: Will the Church Commissioners publish a complete explanation of how they consider the reparatory response proportionate to their acknowledged historical responsibility?

14.39. Preliminary findings

The Church Commissioners announced a £100 million commitment in January 2023.

The original programme envisaged investment, research and engagement over nine years.

The Commissioners have publicly described the commitment as approximately 1% of their endowment and approximately 3% of their planned distributions over the corresponding period.

The Oversight Group subsequently expressed the view that £100 million was insufficient.

It recommended a substantially larger ambition of £1 billion or more and accelerated implementation.

The Commissioners stated that their own financial commitment remained £100 million.

Their published financial results show an endowment valued at £11.6 billion at the end of 2025.

The original historical research identified significant investment connections with the South Sea Company and income associated with those holdings.

Illustrative modern financial comparisons provide important context but are not themselves direct calculations of the Commissioners' present legal liability.

The proposed fund is primarily intended to operate through impact investment and eventual grant-making, rather than direct compensation to individual descendants.

Official programme information continues to describe the fund as not yet operational.

These are the principal findings established through the reviewed institutional material.

However, a complete reconciliation of actual Project Spire allocations, investments, expenditure, transfers and verified beneficiary receipts has not yet been obtained.

The adequacy of the response therefore remains a substantive matter for further assessment.

14.40. Conclusion: financial scale must be judged against responsibility and delivery

The Church Commissioners' £100 million commitment is significant in nominal terms.

However, its adequacy cannot be determined from the headline amount alone.

The Commissioners possess a substantial endowment, valued at £11.6 billion at the end of 2025.

Their historical research identified financial connections with African chattel enslavement.

The independent Oversight Group concluded that the original amount was insufficient and proposed developing a much larger initiative.

The Church Commissioners nevertheless maintained their own commitment at £100 million while expressing support for attracting additional capital and increasing future impact.

These positions must be recorded accurately.

The investigation must determine whether the selected amount was derived from a defensible assessment of historical benefit or another process.

It must also examine how the proposed fund will create reparatory value, who will control the resources, which communities will benefit and what safeguards will protect decision-making.

The £1 billion ambition must not be treated as an existing fund balance without documentary evidence.

The historical £443 million and £1.4 billion comparative figures must not be treated as directly traceable modern assets or automatically established compensation amounts.

The £100 million commitment must not be treated as money already delivered to affected communities.

The central conclusion of Section 14 is that Project Spire's financial adequacy remains an open investigative question requiring a transparent examination of historical responsibility, institutional capacity, proportionality, programme design, community participation and independently verified reparatory delivery.

RNL will not substitute financial announcements for financial evidence.

It will not confuse the growth of an investment portfolio with the receipt of reparatory benefits.

It will not equate participation in consultation with control over resources.

Its continuing task is to establish what reparatory value has actually moved, to whom, when, under what authority and with what demonstrable consequences.

The purpose remains historical truth, professional organisation, transparent financial accountability, fair institutional safeguards, community confidence and the peaceful advancement of reparatory justice.

SECTION 14 — FINANCIAL SCALE AND ADEQUACY EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-14-001	Original £100 million Church Commissioners commitment	Official institutional commitment
SPIRE-14-002	Original nine-year programme from 2023	Official announcement
SPIRE-14-003	Approximately 1% endowment comparison	Commissioners' published explanation
SPIRE-14-004	Approximately 3% planned-distribution comparison	Commissioners' published explanation
SPIRE-14-005	Endowment valuation of £11.1 billion at end of 2024	Historical financial report
SPIRE-14-006	Endowment valuation of £11.6 billion at end of 2025	Published May 2026 results
SPIRE-14-007	8% investment return reported for 2025	Official financial results
SPIRE-14-008	Oversight Group considers £100 million insufficient	Published advisory assessment
SPIRE-14-009	£1 billion-plus programme ambition	Published recommendation
SPIRE-14-010	Commissioners' contribution remains £100 million	Official clarification
SPIRE-14-011	Approximately £443 million historical investment equivalent	Illustrative historical financial measure
SPIRE-14-012	Approximately £1.4 billion historical income equivalent	Illustrative historical financial measure
SPIRE-14-013	Proposed impact investment and grant-making model	Official programme description
SPIRE-14-014	Direct individual compensation not intended	Official Commissioners' explanation

SPIRE-14-015	Fund described as not yet operational	Official implementation statement
SPIRE-14-016	Calculation supporting selection of £100 million	Complete methodology not obtained
SPIRE-14-017	Legally secured external commitments towards £1 billion	Verification outstanding
SPIRE-14-018	Actual fund allocations and capital transfers	Complete reconciliation outstanding
SPIRE-14-019	Grants and investments reaching ultimate beneficiaries	Independent verification outstanding
SPIRE-14-020	Overall financial adequacy of reparatory response	Assessment remains open

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SOURCES AND INDEPENDENT VERIFICATION

Source 14.1 — Church Commissioners, 25 May 2026

Church Commissioners for England endowment fund delivers 8% return in 2025.

https://www.churchofengland.org/media/finance-news/church-commissioners-england-endowment-fund-delivers-8-return-2025

Evidence: Endowment valuation of £11.6 billion at the end of 2025 and reported investment performance.

Source 14.2 — Church Commissioners, January 2023

Church Commissioners publishes full report into historic links to transatlantic chattel slavery and announces new funding commitment of £100 million.

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Evidence: Original commitment, nine-year period, investment, research and engagement purposes.

Source 14.3 — Church Commissioners, March 2024

Church Commissioners warmly welcomes Oversight Group's report.

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

Evidence: Oversight Group's view concerning insufficiency, larger ambition and implementation recommendations.

Source 14.4 — Oversight Group's report

Fund for Healing, Repair and Justice: Recommendations to the Church Commissioners.

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Evidence: Recommendations concerning fund size, Black leadership, grants, impact investments, operating costs and programme governance.

Source 14.5 — Church Commissioners: Frequently Asked Questions

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Evidence: Original commitment, relation to endowment and distributions, £1 billion ambition, investment model and individual compensation distinction.

Source 14.6 — Church Commissioners, June 2024

Learning from the past, to invest in a better future.

https://www.churchofengland.org/media/finance-news/learning-past-invest-better-future

Evidence: Institutional explanation of financial proportionality, historical responsibility and the decision to retain the £100 million commitment.

Source 14.7 — Church Commissioners: Annual Reports

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

Evidence: Annual financial statements, endowment performance and charitable distributions.

Source 14.8 — Historical financial research

Research into Historic Links to Transatlantic Chattel Slavery.

https://data.parliament.uk/DepositedPapers/Files/DEP2025-0405/Research_into_Historic_Links_to_Transatlantic_Chattel_Slavery_Report.pdf

Evidence: Historical South Sea Company investments, benefactions, financial estimates and methodology.

Source 14.9 — Grant Thornton

Investigating the Church's links to slavery.

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

Evidence: Independent forensic accounting description and historical financial comparisons.

Source 14.10 — Official implementation status

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Implementation phase and statement that the fund is not yet operational.

Source 14.11 — Fund for Healing, Repair and Justice

https://hrjfund.org/

Evidence: Public information concerning fund development and proposed governance arrangements.

END OF SECTION 14 — FINANCIAL SCALE AND ADEQUACY: THE £100 MILLION COMMITMENT, THE £1 BILLION AMBITION, THE CHURCH COMMISSIONERS' ENDOWMENT, HISTORICAL FINANCIAL BENEFIT AND THE MEASUREMENT OF REPARATORY JUSTICE

NEXT: SECTION 15 OF 24 — LEGAL AND REGULATORY AUTHORITY: THE CHURCH COMMISSIONERS' CHARITABLE OBLIGATIONS, CHARITY COMMISSION APPROVALS, GOVERNANCE POWERS, REPARATORY EXPENDITURE AND THE STATUS OF THE PROPOSED FUND.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 15 OF 24

LEGAL AND REGULATORY AUTHORITY: THE CHURCH COMMISSIONERS' CHARITABLE OBLIGATIONS, CHARITY COMMISSION APPROVALS, GOVERNANCE POWERS, REPARATORY EXPENDITURE AND THE STATUS OF THE PROPOSED FUND

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
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15.1. Purpose of this section

This section examines the legal and regulatory arrangements governing the Church Commissioners for England's proposed £100 million Fund for Healing, Repair and Justice, associated with Project Spire.

The investigation has already established that the Commissioners' historical research identified financial connections between Queen Anne's Bounty and African chattel enslavement.

It has also established that the Commissioners announced a £100 million commitment in January 2023 and subsequently developed proposals involving impact investment, grant-making, research and engagement.

However, a decision to commit charitable resources does not automatically establish that every proposed transaction has received the legal or regulatory authorisation necessary for implementation.

The present section therefore considers the powers of the Church Commissioners, the responsibilities of their trustees, the involvement of the Charity Commission for England and Wales, the proposed establishment of a new charity, the statutory

mechanism for authorising payments based on moral obligation and the status of the necessary approvals.

It also examines the existence of legal and parliamentary opposition, the distinction between legitimate scrutiny and established illegality, and the relationship between legal authorisation and reparatory justice.

The central question is not simply whether the Church Commissioners believe that Project Spire is morally justified.

It is whether the proposed institutional and financial arrangements have a properly documented legal foundation and how that foundation is being translated into authorised, transparent and independently accountable activity.

15.2. The Church Commissioners as a charitable institution

The Church Commissioners are responsible for managing a substantial endowment intended to support the Church of England's mission and ministry.

The institution operates under a legal and charitable governance framework.

Its assets are not the personal property of individual bishops, officers, trustees or employees.

Those responsible for the institution must administer its resources in accordance with applicable law and the purposes for which the assets are held.

This distinction is essential to understanding Project Spire.

The Commissioners may identify a compelling moral responsibility arising from the historical origins of part of their endowment.

However, implementing that responsibility through the use of charitable property requires consideration of the institution's legal powers.

The legal framework therefore forms part of the investigation's central subject.

The purpose is not to suggest that reparatory activity is inherently unlawful.

It is to establish which powers, approvals and safeguards apply to the particular response proposed by the Commissioners.

15.3. Charitable purposes and trustee responsibilities

Charity trustees are required to act within the powers and purposes of their organisation.

They must exercise appropriate care, consider relevant matters, manage conflicts of interest and account for the use of charitable resources.

Trustees must also distinguish between activities that directly further the charity's purposes and activities requiring separate legal justification or regulatory permission.

The Church Commissioners' response to historical enslavement raises questions about how reparatory investment and grant-making relate to their existing charitable obligations.

The relevant questions concern the purposes of the proposed expenditure, the authority to undertake it and the process through which trustees reach decisions.

It would be improper to presume that the historical connection alone automatically authorises every form of proposed payment.

Equally, it would be improper to conclude that the payment must be unlawful merely because it involves communities beyond the Church Commissioners' traditional beneficiaries.

The precise legal mechanism requires examination.

15.4. The Commissioners' own assessment of legal obligations

A parliamentary answer published on 19 November 2025 provides a significant statement of the Church Commissioners' position.

Marsha De Cordova MP, responding on behalf of the Commissioners, confirmed that the Board of Governors had assessed its legal obligations in relation to Project Spire.

She stated that the assessment had taken account of relevant considerations, including the Charity Commission's guidance on trustee decision-making, known as CC27.

The response also recognised that implementation would require registration of a new charity and appropriate regulatory authorisations.

The Board had authorised the first step.

This is an important documentary finding.

It confirms that the Commissioners acknowledged the existence of legal and regulatory requirements rather than treating the £100 million announcement as sufficient authority for immediate transfer.

However, the parliamentary answer does not reproduce the underlying legal advice or complete Board assessment.

RNL should therefore seek the fullest lawful explanation of the reasoning and the procedural steps that were approved.

Primary source:

UK Parliament, written answer of 19 November 2025, Question 88600:

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88600

15.5. The distinction between legal assessment and regulatory approval

The Commissioners' assessment of their own legal obligations is relevant evidence of trustee consideration.

However, an internal assessment is not necessarily equivalent to an external regulatory authorisation.

A governing body may conclude that a proposed course of action is justified while recognising that a regulator must approve a particular transaction.

This distinction is central to Project Spire.

RNL must identify the legal steps proposed by the Commissioners, which of those steps have been completed and which remain outstanding.

The investigation should also distinguish regulatory conversations from a formal application, a submitted application from an approved application, and an approval from the subsequent implementation of an authorised transaction.

These stages must not be described interchangeably.

A public statement expressing confidence in the programme's legality cannot substitute for an authorisation that the law requires.

15.6. The Charity Commission for England and Wales

The Charity Commission is the relevant charity regulator for the proposed arrangements.

Its responsibilities include registration of charities and the exercise of statutory powers concerning certain dealings with charitable property.

However, the Commission's regulatory role must be distinguished from the Commissioners' responsibility for deciding whether and how to pursue Project Spire.

The regulator does not automatically design the programme, select beneficiaries or manage the investment portfolio.

Its role concerns the statutory and regulatory functions within its authority.

The investigation should establish what applications have been made, what decisions have been issued and what conditions may apply.

Where applications remain pending, that status should be recorded precisely.

Where authorisation is granted, the original decision and any conditions should be examined.

Where authorisation is refused or challenged, the relevant reasoning should be preserved.

15.7. Sections 105 and 106 of the Charities Act 2011

The Charities Act 2011 contains statutory provisions relevant to the proposed arrangements.

Section 105 concerns the Charity Commission's power to authorise certain dealings with charitable property where appropriate statutory conditions are satisfied.

Section 106 concerns the power to authorise ex gratia payments.

An ex gratia payment is distinct from a payment made in satisfaction of an established legal debt.

It may involve a charitable institution wishing to make a payment because it considers that a moral obligation exists even though the payment is not legally enforceable against it.

The distinction is particularly important to Project Spire.

The Church Commissioners have identified a proposed reliance upon moral obligation.

However, the investigation must establish the precise statutory route adopted, the relevant legal requirements and whether the necessary authority has actually been obtained.

Primary legislation:

Charities Act 2011:

https://www.legislation.gov.uk/ukpga/2011/25/contents

15.8. The proposed section 106 authorisation

In a parliamentary answer of 3 July 2025, Marsha De Cordova stated that the Commissioners intended, subject to trustee approval, to apply to the Charity Commission for authority to make an ex gratia payment under section 106 of the Charities Act 2011 on the basis of moral obligation.

This is a decisive documentary statement.

It identifies the legal mechanism the Commissioners were considering for transferring resources in pursuit of their reparatory response.

The proposed moral-obligation basis is important because it distinguishes the Commissioners' institutional decision from an admission of a legally enforceable compensation debt to particular claimants.

However, the existence of a proposed application does not establish that the Charity Commission subsequently granted authorisation.

The investigation must therefore establish the later application history and current legal status.

Primary source:

Hansard, 3 July 2025 — Project Spire:

https://hansard.parliament.uk/commons/2025-07-03/debates/84AE96E4-930F-4402-921C-B2890FC34507/ProjectSpire

15.9. Why the moral-obligation mechanism matters

The Church Commissioners' historical research identified institutional financial connections with African chattel enslavement.

The Commissioners subsequently expressed sorrow and committed themselves to an institutional response.

Their proposed use of an ex gratia mechanism reflects the distinction between a moral response and a payment required by an established legal judgment.

That distinction must be preserved.

A moral obligation may be important even where direct legal liability has not been established.

However, identifying a moral obligation does not remove trustee duties.

The Commissioners must still act within the applicable legal framework.

The investigation should therefore establish how the Board assessed the moral obligation, what evidence it considered and how that assessment informed the proposed amount and recipient structure.

The objective is to examine the legal reasoning without confusing moral responsibility with a court-determined liability.

15.10. Parliamentary confirmation that an application had not yet been made

A written parliamentary answer published on 6 May 2025 confirmed that the Commissioners had not, at that time, applied for authorisation of an ex gratia payment under sections 105 or 106.

The response stated that discussions had been held with the Charity Commission concerning a possible section 106 application.

This establishes an important historical distinction.

Informal regulatory discussions were under way, but the formal application had not yet been submitted.

The investigation should preserve this status as of the date of the answer.

It must not present that historical position as proof that no application was made at any later date.

Subsequent parliamentary statements and regulator records must be examined separately.

Primary source:

UK Parliament, written answer of 6 May 2025:

https://questions-statements.parliament.uk/written-questions/detail/2025-04-22/47118/

15.11. April 2026: application still being prepared

A parliamentary exchange on 16 April 2026 provides a later update.

Marsha De Cordova stated that the Church Commissioners had been holding informal discussions with the Charity Commission.

She also stated that an application was being prepared but had not yet been submitted.

This is particularly important because it demonstrates that the regulatory process remained incomplete more than three years after the original £100 million commitment.

However, delay alone does not establish that the institution acted improperly.

The process may involve complex questions concerning charitable powers, the structure of a new charity and the legal treatment of the proposed payment.

The investigation should therefore ask what work was undertaken during this period, what issues required resolution and what revised timetable was adopted.

Primary source:

Hansard, 16 April 2026 — Project Spire:

https://hansard.parliament.uk/Commons/2026-04-16/debates/29535D83-5236-4702-8832-B722A8D7E6F0/ProjectSpire

15.12. Registration of a new charity

The Commissioners have publicly described plans to establish a new charity to administer the Fund for Healing, Repair and Justice.

This step must be distinguished from authorisation to transfer the £100 million.

Registration of a new charity may establish a legal body capable of holding assets and pursuing specified charitable purposes.

It does not necessarily authorise another charity to transfer money into that body where separate regulatory approval is required.

The investigation must therefore identify the proposed new charity's legal form, governing document, purposes, trustees and regulatory registration status.

It should also establish whether the name used publicly corresponds to a registered legal entity.

No proposed fund should be described as a fully operational registered charity without confirmation from the Charity Commission's register.

15.13. The sequence of proposed legal steps

The parliamentary record describes a sequence involving the establishment of a new charity and subsequent authorisation of the proposed financial transfer.

In October 2025, the Commissioners confirmed that their Board had authorised an application to register the proposed Fund for Healing, Repair and Justice.

The response explained that, subject to that application, the Board would subsequently consider an application to authorise an ex gratia payment under section 106.

This sequence is important because it identifies two distinct approvals.

The first concerns the proposed recipient charity.

The second concerns the Commissioners' authority to transfer resources.

The investigation must establish whether the sequence has since been modified and whether each relevant step has been completed.

Primary source:

UK Parliament, written answer of 20 October 2025:

https://questions-statements.parliament.uk/written-questions/detail/2025-10-15/82378

15.14. The status of the £100 million during the authorisation process

A parliamentary answer published on 1 September 2025 made an important financial statement.

It explained that the £100 million remained within the Church Commissioners' general fund pending regulatory authorisation.

The response also stated that the Commissioners would not deploy the committed amount before the required authorisation was obtained.

This is highly relevant to RNL's financial accountability methodology.

It confirms that the original announcement did not itself cause the committed sum to be transferred to a new charity.

It also reinforces the need to distinguish programme-development expenditure from deployment of the £100 million.

However, the September 2025 statement is a historical account.

The investigation must establish whether subsequent authorisations, transfers or other material changes occurred before 18 October 2026.

Primary source:

UK Parliament, written answer of 1 September 2025, Question 69330:

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

15.15. The legal distinction between preparatory expenditure and fund deployment

The Commissioners have acknowledged expenditure associated with historical research, programme development and regulatory preparation.

Such expenditure may fall within existing charitable responsibilities even where the proposed separate fund remains subject to authorisation.

However, the legal basis and financial treatment of that expenditure must be examined.

RNL should establish which budgets were used, which officers authorised the spending and whether the expenditure was treated as preparatory work rather than an ex gratia transfer.

A payment for historical research is not automatically equivalent to a reparatory grant.

Similarly, expenditure on legal advice or programme design does not itself demonstrate that funds have been received by affected communities.

The investigation must therefore preserve separate records for programme-development expenditure and the proposed £100 million capital commitment.

15.16. The dispute concerning reported research expenditure

Parliamentary questions in 2025 raised claims that substantial sums had already been spent on Project Spire.

In response, the Commissioners disputed a suggested £5 million expenditure figure.

They stated that expenditure had been confined to proportionate research, consideration of the institutional response and preparatory regulatory work.

This is an important example of a contested financial claim.

The investigation should not adopt the £5 million figure merely because it appeared in a parliamentary question.

Nor should it regard the Commissioners' response as a complete audited breakdown of expenditure.

The appropriate next step is to obtain the actual amounts spent, their dates, purposes and financial classifications.

The investigation should reconcile published accounts with the Commissioners' parliamentary statements.

Primary sources:

UK Parliament, response concerning expenditure, July 2025:

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

Further clarification, September 2025:

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

15.17. Legal advice and the limits of disclosure

A parliamentary answer published in November 2025 stated that legal advice obtained by the Church Commissioners was subject to legal professional privilege.

This is relevant because RNL may not be entitled to inspect every confidential legal communication.

However, the existence of privilege does not eliminate the possibility of providing public explanations of legal powers, procedural decisions and regulatory status.

The investigation should therefore distinguish privileged legal advice from documents that can properly be disclosed.

It may be reasonable to request the statutory provisions relied upon, the decisions made by the Board, the relevant applications and any regulatory orders.

RNL should not automatically treat an institution's refusal to disclose privileged advice as evidence of wrongdoing.

The objective is the fullest lawful transparency.

Primary source:

UK Parliament, written answer of 24 November 2025:

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88597/

15.18. The distinction between reparations and the Commissioners' own terminology

A November 2025 parliamentary answer expressly distinguished the Commissioners' proposed programme from direct slavery compensation.

It stated that Project Spire should not simply be described as a programme of slavery reparations.

The Commissioners presented the Fund for Healing, Repair and Justice as an act of reparative justice intended to contribute to healing and repair.

This distinction must be recorded accurately.

RNL may independently examine whether the programme satisfies appropriate standards of reparatory justice.

However, it should not misrepresent the legal or financial model as one promising direct compensation to individual descendants.

The Commissioners' chosen terminology is relevant to understanding the programme's intended function and legal structure.

The investigation should also examine whether that terminology affects the identification of beneficiaries, the assessment of historical responsibility and the expectations of affected communities.

15.19. The relationship between charitable purpose and reparative justice

The moral and institutional objectives of Project Spire may be substantial.

However, translating those objectives into authorised charitable activity requires a lawful structure.

The Commissioners have described their response as connected to institutional repentance, healing, justice and the continuing effects of historical enslavement.

The legal question concerns how those purposes relate to the Commissioners' existing charitable obligations and any newly established charity.

The investigation should obtain the proposed charitable objects of the new Fund for Healing, Repair and Justice.

Those objects will be important because they may determine what activities the fund is legally permitted to finance.

The terms of the new charity may also affect whether grants, investments and other payments can be made to particular communities or organisations.

The investigation must therefore examine the actual governing document rather than rely exclusively on general descriptions of reparatory intention.

15.20. Parliamentary scrutiny of Project Spire

Members of Parliament have repeatedly questioned the legal and financial basis of Project Spire.

Some have challenged whether the Church Commissioners are entitled to use endowment resources for the proposed fund.

Others have questioned the relationship between the programme and financial support for local parishes.

These are matters of legitimate public and parliamentary scrutiny.

The Commissioners have responded that they intend to proceed within their legal powers and that Project Spire funding comes from the endowment rather than parish collections.

The existence of parliamentary disagreement does not prove either that the programme is lawful or that it is unlawful.

The relevant legal questions must be assessed through the statutory framework, regulatory decisions and, where applicable, judicial determinations.

RNL should preserve both the questions and the responses in its permanent reference library.

15.21. The Commissioners' explanation concerning parish finances

In parliamentary responses, the Commissioners have stated that Project Spire is funded from their endowment and not from individual parish collections.

They have also distinguished the proposed reparatory programme from separate funding arrangements for church buildings and ministry.

These statements are important because public criticism has included concern about the needs of struggling local parishes.

However, the fact that funds do not come directly from parish collections does not settle every question about the allocation of endowment income.

The broader question concerns the Commissioners' lawful responsibilities and how they balance competing institutional purposes.

The investigation should therefore examine the relevant financial and charitable obligations rather than rely upon simplified claims that Project Spire either does or does not affect the wider Church's resources.

Primary source:

Hansard, 3 September 2026 — Project Spire:

https://hansard.parliament.uk/commons/2026-09-03/debates/E367569C-A049-4CE6-9295-33F474B61875/ProjectSpire

15.22. The September 2026 parliamentary commitment to proceed

In September 2026, Marsha De Cordova stated that the Church Commissioners intended to proceed with Project Spire.

This confirms the institution's publicly stated intention at that time.

However, an intention to proceed is not the same as confirmation that every regulatory condition has been satisfied.

The distinction is particularly important where earlier statements identified the need for charity registration and ex gratia authorisation.

The investigation should therefore seek a current statement setting out the exact legal steps completed since the April 2026 parliamentary answer.

The Commissioners should identify which approvals have been granted, which applications remain pending and what conditions must be satisfied before deployment of the committed resources.

15.23. October 2026: reported prospective legal challenge

Public reporting in October 2026 describes an attempt to challenge the proposed fund through legal and regulatory procedures.

The reports identify opponents who question whether the Church Commissioners possess the legal authority to make the proposed reparatory payment.

The challenge is significant because it may affect the timetable for obtaining authorisation or establishing the new fund.

However, a reported intention to pursue litigation must not be confused with a court judgment.

Nor should an application seeking permission for a challenge be described as a completed determination of illegality.

The investigation must establish the procedural status of any legal action.

It should identify whether a formal application has been submitted, which body is considering it, whether permission has been granted and whether any judicial decision exists.

Until those facts are established, the programme should be described as subject to legal and regulatory challenge rather than declared unlawful.

Contemporary reporting:

The Guardian, 13 October 2026:

https://www.theguardian.com/world/2026/oct/13/church-of-england-slavery-compensation-fund

Additional reporting concerning proposed proceedings appears in The Times, October 2026.

15.24. The difference between an objection and a legal finding

Public opposition may arise for several reasons.

Some critics may disagree with the historical interpretation underlying Project Spire.

Others may accept the historical findings but disagree with the proposed financial response.

Others may question the legal authority to transfer charitable resources.

These positions should not be treated as identical.

The investigation must distinguish historical disagreement, moral disagreement, financial disagreement and legal challenge.

Each may require a different form of evidence.

A historian's criticism does not automatically establish that the proposed payment is unlawful.

A legal objection does not establish that the original historical research is false.

A financial argument concerning alternative uses of resources does not by itself establish that reparatory investment is impermissible.

RNL will examine the relevant arguments according to their actual content and evidential foundation.

15.25. The need for a complete regulatory chronology

The publicly identified regulatory history includes informal discussions, a proposed registration application, a potential subsequent section 106 application and continuing implementation work.

However, the available records do not yet provide a complete and definitive regulatory chronology through 18 October 2026.

The investigation must therefore obtain or verify the dates of relevant applications, decisions, correspondence and orders.

It should distinguish an application that has been authorised internally from an application submitted to the regulator.

It should distinguish registration of a new charity from authority to transfer money to that charity.

It should also establish whether any proposed transaction is subject to additional restrictions or conditions.

An accurate chronology is necessary to assess delay, legal compliance and programme readiness.

15.26. Governance of the proposed recipient charity

The establishment of a new charity raises questions concerning the governance arrangements for the Fund for Healing, Repair and Justice.

The investigation must establish its proposed charitable objects, trustee appointment procedures, financial policies and relationship with the Church Commissioners.

It should determine whether the Church Commissioners intend to retain control of the fund or transfer governance responsibility to a different body.

This is particularly relevant to the Oversight Group's recommendation concerning eventual Black community ownership and leadership.

The legal form of the fund may affect the practical meaning of those commitments.

The investigation should therefore distinguish advisory participation, trustee membership, executive management and ownership or control of financial assets.

No one form of community participation should automatically be treated as equivalent to another.

15.27. Conflicts of interest and the trustees' duties

The proposed arrangements may involve multiple institutions, advisers, investment managers, researchers and community representatives.

This makes conflict-of-interest procedures important.

The investigation should establish how trustees and other relevant decision-makers identify and manage competing responsibilities.

It should determine whether external professional roles require declaration, whether interested persons are excluded from particular decisions and how any decisions are recorded.

These questions are relevant to the documented overlapping activities examined in earlier sections.

However, the existence of an overlapping professional role does not establish an improper conflict.

The investigation must identify whether a relevant interest existed, whether it affected an actual decision and how the applicable procedures operated.

The purpose is transparent governance rather than suspicion based upon association alone.

15.28. Legal authority over research and engagement expenditure

Project Spire has involved historical research and engagement work.

The Church Commissioners have stated that preparatory expenditure was undertaken in connection with understanding the origins of their funds, maintaining public trust and exploring regulatory authorisation.

The legal basis for such expenditure may differ from the basis required for a separate ex gratia transfer.

The investigation should therefore seek clarification of the powers under which research and programme-development activities were authorised.

It should also determine whether relevant expenditure was approved through ordinary budgetary procedures.

The existence of professional research contracts or staff appointments does not establish that the proposed £100 million fund was already operational.

The two categories must remain separate in financial and legal reporting.

15.29. Legal authority over investments and grants

The proposed fund is expected to undertake impact investments and grant-making.

The legal powers necessary for those activities will depend upon the final charitable structure and governing documents.

The investigation should identify which body will approve investment policy, which officers will execute transactions and what restrictions will govern the selection of recipients.

A power to hold investments is not necessarily identical to a power to make unrestricted grants.

Similarly, permission to create a new charity does not automatically establish authority to conduct every proposed activity.

The investigation should therefore examine the complete governing and regulatory framework.

It should establish how relevant decisions can be reviewed and challenged.

The eventual financial activities must be assessed against the powers actually granted.

15.30. The importance of regulatory conditions

A regulator may grant authority subject to conditions.

Such conditions may concern the transaction authorised, the amount involved, procedures to be followed or other statutory requirements.

The investigation should therefore seek the full text of any authorisation rather than relying solely on an announcement that approval has been obtained.

The legal effect of an order depends upon its actual terms.

A decision granting limited authority must not be described as unrestricted approval of all future activity.

Similarly, approval of one stage of implementation must not be treated as confirmation that all later stages have been completed.

The investigation must preserve the exact scope of each regulatory decision.

15.31. The possibility of judicial review or charity proceedings

Public reports concerning a possible legal challenge raise questions about the available legal procedures.

Depending upon the decision or conduct being challenged, proceedings may involve different statutory routes, permission requirements and judicial remedies.

The investigation should not use the term *judicial review* indiscriminately.

A challenge to a regulatory decision, an application concerning charity administration and other forms of litigation may have different procedural requirements.

The correct legal characterisation must be established from filed documents.

Where proceedings are commenced, RNL should preserve the claim, the response, relevant procedural orders and any eventual judgment.

A court filing is not equivalent to a successful claim.

Permission to pursue proceedings is not equivalent to a final decision on the merits.

These distinctions are necessary for accurate public reporting.

15.32. The legal status of the proposed fund as at 18 October 2026

The Church Commissioners' official public enquiry page continues to state that the Fund for Healing, Repair and Justice is in the implementation phase and is not yet operational.

That statement is significant.

It establishes the institution's publicly reported operational position.

However, it does not provide a complete public list of every individual regulatory step completed.

The investigation should therefore avoid asserting that no application or approval exists merely because the fund is not yet operational.

Equally, the original commitment must not be described as a completed transfer.

The precise legal status requires current confirmation from the relevant institutions and, where available, the Charity Commission register.

Official source:

Church Commissioners — Tell us what you think:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

15.33. The implications of regulatory delay

The original commitment was announced in January 2023.

The parliamentary record shows that the programme continued to require regulatory work in April 2026.

The official institutional page still describes the fund as not operational.

This raises questions concerning the time taken to establish the programme.

Delay may affect public expectations, the real value of financial commitments and the timing of potential benefits.

However, delay cannot automatically be attributed to negligence or deliberate obstruction.

Legal and regulatory arrangements may involve complex questions requiring careful consideration.

The investigation should establish which matters caused delay, who was responsible for resolving them and what timetable was communicated.

The objective is to identify the actual reasons and consequences rather than presume them.

15.34. The relevance of the Oversight Group's recommendation to accelerate delivery

The Oversight Group recommended accelerating the programme beyond the original nine-year timetable.

Its recommendation reflected concern about the urgency and scale of the reparatory response.

The continuing implementation period therefore raises questions about how the Commissioners addressed that recommendation.

The investigation should determine whether an accelerated timetable was adopted.

If it was not, the reasons should be explained.

If the timetable was subsequently revised, the original and revised milestones should be published.

A recommendation to accelerate is not proof that a legally viable earlier launch date existed.

Nevertheless, it establishes that speed of implementation was considered a significant matter by the Commissioners' own advisers.

15.35. The rights and interests of potential beneficiaries

The proposed fund may eventually provide grants, investments or other forms of financial assistance.

However, until the necessary legal and operational arrangements exist, potential beneficiaries should not be led to believe that an application process is open or that specific funds are available.

The Commissioners' public information currently states that grant applications are not yet available.

The investigation should therefore examine the accuracy of all external communications concerning eligibility and access.

It should determine whether any organisations have been invited to submit proposals or participate in preparatory processes, and whether the status of those activities was clearly explained.

An expression of interest should not be confused with a grant award.

Participation in consultation should not be confused with approval for funding.

Clear communication is essential to preventing misunderstandings.

15.36. The role of affected communities in legal and governance design

The legal structure of the proposed fund may affect who controls decisions and who benefits from the resources.

For that reason, affected communities have a legitimate interest in understanding the proposed governance arrangements.

The investigation should establish whether grassroots Black/Afrikan reparations organisations were consulted concerning the new charity's objects, trustee appointments and decision-making structure.

It should also determine whether the eventual legal arrangement reflects the Oversight Group's recommendation concerning Black community ownership and leadership.

Consultation does not automatically establish consent.

Representation does not automatically establish legal authority.

The investigation must distinguish those concepts.

The purpose is to understand whether affected communities have meaningful opportunities to participate in decisions concerning a programme intended to address historical harm affecting them.

15.37. Safeguards against anti-Black racism and Institutional Racism

RNL seeks written evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism affecting Project Spire's legal, regulatory and governance arrangements.

The fact that Project Spire arises from an acknowledgement of historic enslavement does not automatically establish that all contemporary decision-making systems are adequately protected from racial bias.

Relevant questions concern trustee selection, consultation, professional appointments, investment policy, grant-making and complaints.

The investigation should examine whether affected communities can obtain reasons for decisions and access independent review procedures.

These questions concern institutional safeguards.

They do not amount to an allegation that the Charity Commission, Church Commissioners or named individuals have acted with racist intent.

The purpose is to establish which protections exist, how they operate and whether they can be independently scrutinised.

15.38. The possibility of Institutional Racism within legal decision-making

RNL specifically seeks recognition of the possibility that institutional decision-making can be affected by racial bias even where no individual decision-maker openly expresses discriminatory intentions.

The investigation therefore asks whether the relevant institutions acknowledge that possibility and what safeguards they apply.

This is especially important where the proposed response concerns the historical exploitation of African people.

The institutions should be able to explain whether equality-impact assessments, independent reviews, community participation arrangements or other mechanisms have been considered.

RNL has made no finding that such bias has affected Project Spire's legal approvals.

The enquiry concerns risk prevention and evidence of safeguards.

The existence of legal and regulatory procedures should not automatically be treated as sufficient proof that every possible institutional bias has been addressed.

15.39. Transparency, legal certainty and conflict prevention

The prolonged development of a substantial reparatory commitment can generate uncertainty.

Potential beneficiaries may be unsure whether funds are available.

Critics may question whether the proposed use of resources is lawful.

Institutions may disagree about the appropriate form of reparatory justice.

These circumstances make transparent legal and regulatory communication especially important.

RNL maintains that professional organisation, truthful information and clear accountability are preventative foundations for peace.

The possibility of intimidation, threats of violence or violence arising from serious unresolved disputes should be considered within responsible risk management.

This is not a prediction that violence will occur.

Nor does the investigation attribute violent intentions to supporters or opponents of Project Spire.

The objective is to address disputes early through lawful processes, accessible records, respectful communication and fair opportunities for challenge.

15.40. The importance of preserving both supporting and opposing evidence

A comprehensive investigation must preserve the arguments of the Church Commissioners and the evidence relied upon by their critics.

It should include official institutional statements, parliamentary exchanges, regulatory documents and any relevant court papers.

Where historical research is contested, the underlying evidence should be examined.

Where legal authority is contested, the statutory provisions and regulatory decisions should be identified.

Where financial implications are disputed, the original accounts and calculations should be obtained.

The investigation must not selectively record only material supporting one institutional position.

Nor should it treat public controversy as a substitute for legal analysis.

The objective is a permanent reference library capable of supporting independent scrutiny over time.

15.41. Priority questions concerning statutory authority

Question 15.1: What statutory powers do the Church Commissioners rely upon in proposing to establish the Fund for Healing, Repair and Justice?

Question 15.2: What legal powers were relied upon when the original £100 million commitment was approved?

Question 15.3: What specific statutory provisions are considered necessary for implementing the proposed transfer?

Question 15.4: Is section 106 of the Charities Act 2011 still the principal authorisation route?

Question 15.5: If a different or additional statutory mechanism is now proposed, what is it and why was it selected?

Question 15.6: How did the Board assess its trustee obligations under the applicable charitable framework?

Question 15.7: What formal decisions recorded the Board's conclusions?

Question 15.8: What aspects of the legal reasoning can be disclosed without waiving legal professional privilege?

Question 15.9: Has any independent legal opinion been published concerning the proposed payment?

Question 15.10: What legal distinction do the Commissioners draw between reparative justice, direct compensation and an ex gratia payment?

15.42. Priority questions concerning the Charity Commission

Question 15.11: On what dates did the Commissioners first approach the Charity Commission concerning Project Spire?

Question 15.12: What formal applications have been submitted?

Question 15.13: Has an application to register the new Fund for Healing, Repair and Justice been submitted?

Question 15.14: Has that application been accepted, approved, deferred or rejected?

Question 15.15: Has an application for ex gratia authorisation under section 106 been submitted?

Question 15.16: Has the Charity Commission issued a decision on that application?

Question 15.17: If authorisation has been granted, what conditions apply?

Question 15.18: If authorisation remains outstanding, what steps must still be completed?

Question 15.19: Have any formal regulatory objections been submitted by third parties?

Question 15.20: Will the Commissioners publish a dated regulatory chronology?

15.43. Priority questions concerning fund governance

Question 15.21: What legal entity is intended to receive and administer the £100 million?

Question 15.22: What are its proposed charitable objects?

Question 15.23: Who will appoint its trustees or directors?

Question 15.24: What powers will the Church Commissioners retain after any transfer?

Question 15.25: How will affected Black/Afrikan communities participate in governance?

Question 15.26: How will conflicts of interest be managed?

Question 15.27: What independent audit arrangements will apply?

Question 15.28: What procedures will permit beneficiaries to challenge decisions?

Question 15.29: What public reporting requirements will govern investments and grants?

Question 15.30: How will the governance structure implement the Oversight Group's recommendations concerning Black community leadership and control?

15.44. Priority questions concerning legal challenges

Question 15.31: Have any formal proceedings been commenced challenging Project Spire or related regulatory decisions?

Question 15.32: If so, which court or regulatory body is considering them?

Question 15.33: What is the precise legal basis of the challenge?

Question 15.34: Has permission to proceed been requested or granted?

Question 15.35: Have any interim restrictions or other orders been made?

Question 15.36: What response has been filed by the Church Commissioners or the relevant regulator?

Question 15.37: Does any pending challenge legally prevent further implementation?

Question 15.38: What public records are available concerning the proceedings?

Question 15.39: What timetable is anticipated for relevant decisions?

Question 15.40: How will affected communities be informed of material developments without misleading statements concerning the outcome?

15.45. Priority questions concerning expenditure and delivery

Question 15.41: What preparatory expenditure has occurred since Project Spire commenced?

Question 15.42: Under what legal powers was that expenditure authorised?

Question 15.43: What proportion relates to historical research, legal advice, consultancy, engagement and governance preparation?

Question 15.44: Was any expenditure deducted from the original £100 million commitment?

Question 15.45: Has any part of the committed amount been transferred to a separate entity?

Question 15.46: What documents establish that any such transfer was legally authorised?

Question 15.47: What amount, if any, has been invested through the proposed fund?

Question 15.48: What amount, if any, has been received by ultimate reparatory beneficiaries?

Question 15.49: What independent audit evidence supports any claimed delivery?

Question 15.50: Will the Commissioners provide a complete reconciliation distinguishing preparatory expenditure, authorised transfers and verified reparatory outcomes?

15.46. Priority questions concerning safeguards and institutional accountability

Question 15.51: What evidence exists of safeguards against anti-Black racism and Institutional Racism in the legal and regulatory decision-making processes?

Question 15.52: Have equality-impact or comparable risk assessments been undertaken?

Question 15.53: What independent review procedures apply to trustee appointments and beneficiary decisions?

Question 15.54: What mechanisms exist for raising concerns about conflicts of interest?

Question 15.55: Can affected communities obtain written explanations of decisions affecting them?

Question 15.56: What complaints and appeals arrangements will operate once the fund becomes operational?

Question 15.57: What steps have been taken to explain the delay to potential beneficiaries?

Question 15.58: How will the institutions distinguish community consultation from consent or authorisation?

Question 15.59: What measures exist to prevent serious disputes, intimidation and threats of violence through transparent and peaceful processes?

Question 15.60: Will the Church Commissioners provide a comprehensive written statement identifying the programme's current legal authority, regulatory status and expected implementation timetable?

15.47. Preliminary legal and regulatory findings

The parliamentary record establishes that the Church Commissioners' Board considered its legal obligations in relation to Project Spire.

The Commissioners identified section 106 of the Charities Act 2011 as the proposed route for authorising an ex gratia payment based upon moral obligation.

The institution also proposed registering a new charity called the Fund for Healing, Repair and Justice.

The two processes were described as separate steps.

In September 2025, the Commissioners stated that the £100 million remained within their general fund pending regulatory authorisation.

In April 2026, they stated that the relevant application was still being prepared and had not yet been submitted.

In September 2026, the Commissioners publicly reaffirmed their intention to proceed with Project Spire.

Their official public information continues to describe the proposed fund as not yet operational.

Contemporary reporting in October 2026 identifies organised opposition and a potential legal challenge concerning the proposed use of charitable assets.

However, the investigation has not established a final judicial determination that Project Spire is unlawful.

Nor has it obtained a complete, current register of all relevant applications, approvals and decisions through 18 October 2026.

The legal and regulatory position therefore requires further verification.

15.48. The distinction between lawful authorisation and reparatory adequacy

Legal authorisation is necessary for the proposed financial arrangements to proceed lawfully.

However, lawful authorisation does not automatically establish that the reparatory response is adequate.

A fund may operate within its legal powers while still raising legitimate questions about historical valuation, community participation, beneficiary eligibility and practical delivery.

Conversely, a morally compelling reparatory objective does not eliminate legal obligations governing charitable resources.

These are separate dimensions of accountability.

RNL must examine both.

The investigation should not use concerns about legal authority to dismiss the historical suffering to which Project Spire seeks to respond.

Nor should historical responsibility be treated as a substitute for the legal processes required to administer charitable funds.

The objective is an institutionally sound programme capable of delivering reparatory justice lawfully, transparently and effectively.

15.49. Conclusion: legal authority must be documented before financial delivery can be treated as authorised

Project Spire rests upon a significant institutional commitment arising from historical research into African chattel enslavement.

However, the programme's legal and regulatory framework has been a subject of sustained parliamentary scrutiny and public dispute.

The Church Commissioners have identified the need to establish a new charity and obtain appropriate authorisation concerning the proposed ex gratia transfer.

Their parliamentary answers distinguish preparatory work from deployment of the committed £100 million.

The official public position continues to describe the fund as not yet operational.

These facts must be preserved.

The investigation must obtain a complete record of statutory powers, trustee decisions, regulatory applications, authorisations, conditions and any relevant litigation.

It must also establish how the eventual legal structure will protect affected communities, provide transparent financial reporting and implement safeguards against possible anti-Black racism and Institutional Racism.

Legal controversy must not be presented as proof of illegality.

Institutional confidence must not be presented as proof that every approval has already been obtained.

The legal framework must be established through the actual documents and decisions.

The central conclusion of Section 15 is that the Church Commissioners have publicly identified a proposed legal route for Project Spire, including new charity registration and ex gratia authorisation, but the complete current status of those processes and the lawful deployment of the £100 million require further documentary verification.

RNL's objective remains a legally sound, transparent, professionally organised and independently accountable reparatory process that protects community confidence and advances peaceful reparatory justice.

SECTION 15 — LEGAL AND REGULATORY EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-15-001	Church Commissioners' charitable governance obligations	Established legal framework
SPIRE-15-002	Board assessment of legal obligations and CC27 guidance	Confirmed by parliamentary answer
SPIRE-15-003	Proposed reliance upon section 106 of Charities Act 2011	Confirmed parliamentary position
SPIRE-15-004	Proposed new charity registration	Confirmed institutional intention
SPIRE-15-005	New charity registration and ex gratia authorisation treated as separate steps	Confirmed parliamentary sequence
SPIRE-15-006	No application submitted as at April 2026 parliamentary answer	Dated official statement
SPIRE-15-007	£100 million retained in general fund pending authorisation in September 2025	Dated official financial statement
SPIRE-15-008	Church Commissioners intend to proceed as at September 2026	Parliamentary statement
SPIRE-15-009	Proposed fund described as not operational	Official public status

SPIRE-15-010	Legal advice subject to professional privilege	Confirmed parliamentary position
SPIRE-15-011	Preparatory research and regulatory expenditure acknowledged	Official parliamentary statements
SPIRE-15-012	Reported £5 million expenditure disputed by Commissioners	Contested figure
SPIRE-15-013	Legal opposition and proposed court challenge in October 2026	Contemporary reporting
SPIRE-15-014	Completed charity registration	Current confirmation required
SPIRE-15-015	Completed ex gratia authorisation	Current confirmation required
SPIRE-15-016	Final governing document and trustee appointments	Verification required
SPIRE-15-017	Authorised transfer of £100 million	Not established from sources examined
SPIRE-15-018	Current status of legal proceedings	Procedural verification required
SPIRE-15-019	Safeguards against anti-Black racism and Institutional Racism	Documentary examination outstanding
SPIRE-15-020	Verified reparatory delivery under authorised arrangements	Not established

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SOURCES AND INDEPENDENT VERIFICATION

Source 15.1 — Charities Act 2011

https://www.legislation.gov.uk/ukpga/2011/25/contents

Purpose: Statutory framework, including sections 105 and 106.

Source 15.2 — Charity Commission guidance CC27

https://www.gov.uk/government/publications/its-your-decision-charity-trustees-and-decision-making

Purpose: Trustee decision-making duties and good practice.

Source 15.3 — UK Parliament, 6 May 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-04-22/47118/

Purpose: Confirmation that the Commissioners had held discussions but not yet made an ex gratia authorisation application at that date.

Source 15.4 — Hansard, 3 July 2025

https://hansard.parliament.uk/commons/2025-07-03/debates/84AE96E4-930F-4402-921C-B2890FC34507/ProjectSpire

Purpose: Proposed use of section 106 and parliamentary scrutiny of legal authority.

Source 15.5 — UK Parliament, 1 September 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

Purpose: Confirmation that £100 million remained in the general fund pending regulatory authorisation.

Source 15.6 — UK Parliament, 20 October 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-10-15/82378

Purpose: Board authorisation of a new charity registration application and proposed subsequent ex gratia application.

Source 15.7 — UK Parliament, 19 November 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88600

Purpose: Trustee legal assessment, CC27 and recognition of required approvals.

Source 15.8 — UK Parliament, 24 November 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88597/

Purpose: Legal professional privilege, new charity application and explanation of reparative justice terminology.

Source 15.9 — Hansard, 16 April 2026

https://hansard.parliament.uk/Commons/2026-04-16/debates/29535D83-5236-4702-8832-B722A8D7E6F0/ProjectSpire

Purpose: Informal Charity Commission discussions and application preparation.

Source 15.10 — Hansard, 3 September 2026

https://hansard.parliament.uk/commons/2026-09-03/debates/E367569C-A049-4CE6-9295-33F474B61875/ProjectSpire

Purpose: Commissioners' continuing intention to proceed and statements concerning funding sources.

Source 15.11 — Church Commissioners' response, 19 January 2026

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Purpose: Institutional response to parliamentary concerns and explanation of proposed financial and legal arrangements.

Source 15.12 — Church Commissioners' official implementation status

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Purpose: Current statement that the fund remains in implementation and is not yet operational.

Source 15.13 — Church Commissioners' FAQs

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Purpose: Investment, grants, programme structure and legal preparation.

Source 15.14 — The Guardian, 13 October 2026

https://www.theguardian.com/world/2026/oct/13/church-of-england-slavery-compensation-fund

Purpose: Contemporary reporting on opposition, legal concerns and the possible challenge. This is secondary reporting, not a judicial determination.

Source 15.15 — Charity Commission register

https://register-of-charities.charitycommission.gov.uk/

Purpose: Independent verification of any registered fund entity, governing details and charity status.

END OF SECTION 15 — LEGAL AND REGULATORY AUTHORITY: THE CHURCH COMMISSIONERS' CHARITABLE OBLIGATIONS, CHARITY COMMISSION APPROVALS, GOVERNANCE POWERS, REPARATORY EXPENDITURE AND THE STATUS OF THE PROPOSED FUND

NEXT: SECTION 16 OF 24 — GOVERNANCE AND DECISION-MAKING: THE CHURCH COMMISSIONERS' BOARD, PROJECT SPIRE OVERSIGHT GROUP, PROPOSED FUND TRUSTEES, BLACK COMMUNITY LEADERSHIP, DELEGATED AUTHORITY AND CONFLICTS OF INTEREST.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 16 OF 24

GOVERNANCE AND DECISION-MAKING: THE CHURCH COMMISSIONERS' BOARD, PROJECT SPIRE OVERSIGHT GROUP, PROPOSED FUND TRUSTEES, BLACK COMMUNITY LEADERSHIP, DELEGATED AUTHORITY AND CONFLICTS OF INTEREST

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Existing institutional and advisory structures documented. The final governance arrangements, appointments, delegated powers, community representation and operational safeguards require further verification.

16.1. Purpose of this section

This section examines the governance and decision-making arrangements associated with Project Spire and the proposed Fund for Healing, Repair and Justice.

The preceding sections established the historical origins of the programme, its proposed £100 million financial commitment, the distinction between investment and reparatory delivery, and the legal and regulatory processes involved in establishing the fund.

The present section addresses a further fundamental question:

Who possesses the authority to decide what happens to the money, who may benefit from it, and who is accountable for those decisions?

This question cannot be answered adequately by identifying a list of prominent individuals or institutions.

Governance concerns the legal and practical arrangements through which decisions are proposed, considered, authorised, implemented, scrutinised and corrected.

It also concerns the relationship between the Church Commissioners' existing Board of Governors, the independent Oversight Group, programme workstreams, professional staff, external advisers, proposed trustees and the affected Black/Afrikan communities.

The investigation must distinguish a person who participates in consultation from a person who can authorise expenditure.

It must distinguish an adviser from a trustee.

It must distinguish an employee or contractor from a legal decision-maker.

It must distinguish representation from actual control.

It must also establish whether conflicts of interest are identified and managed, whether institutional safeguards operate effectively, and whether persons affected by decisions possess meaningful opportunities to challenge them.

The purpose is to construct an accurate, evidence-based account of authority and accountability.

16.2. Why governance is central to reparatory justice

A reparatory programme may acknowledge historical harm and make substantial financial commitments while still leaving important questions unanswered concerning authority.

For example, a fund may appoint Black advisers without giving them control over financial decisions.

It may consult community organisations without granting them representation in governance.

It may offer grants without allowing beneficiaries to participate in determining priorities.

It may appoint an independent trustee board while retaining substantial powers within the institution providing the money.

These arrangements have different meanings.

None should be assumed to be inherently legitimate or illegitimate without examining the actual structure.

However, the differences must be made visible.

Reparatory justice concerns not only the distribution of resources but also questions of power, participation, institutional responsibility and the capacity of affected communities to influence their own futures.

The investigation should therefore examine both formal governance and practical decision-making.

A document stating that a fund will be Black-led is relevant evidence of an intention.

It is not proof that Black communities currently possess authority over the fund.

16.3. The Church Commissioners' Board of Governors

The Church Commissioners' Board of Governors is the principal institutional decision-making body identified in the official Project Spire records.

The Commissioners' announcement of January 2023 established the original £100 million commitment.

In November 2023, the Board formally accepted the independent Oversight Group's report and recommendations.

The subsequent public announcement in March 2024 described the Board's intention to use those recommendations to shape the Fund for Healing, Repair and Justice.

These are significant governance decisions.

However, accepting recommendations is not necessarily equivalent to transferring final authority over the programme.

The investigation must establish which decisions remain reserved to the Board and which responsibilities have been delegated.

It should identify the relevant committees, officers and procedures through which implementation decisions are made.

Primary source:

Church Commissioners — Response to Oversight Group report, 4 March 2024:

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

16.4. The Board's legal responsibilities

The Church Commissioners are responsible for administering their charitable resources within the applicable legal framework.

The Board's responsibilities include considering the institution's purposes, financial obligations and the legal authority for proposed transactions.

Parliamentary records confirm that the Board assessed its obligations in relation to Project Spire and considered the Charity Commission's trustee decision-making guidance.

This is important because it establishes that the programme has been considered through an institutional governance process.

However, an internal assessment does not establish that every proposed financial transfer has received external regulatory approval.

The Board's legal responsibility must therefore be distinguished from the regulator's role.

The investigation should obtain the fullest available documentary explanation of how decisions were made.

The objective is to establish the lawful decision-making structure, not to presume that a particular decision was improper.

Primary source:

UK Parliament, written answer, 19 November 2025:

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88600

16.5. Authority to make the original £100 million commitment

The original £100 million announcement was a decision of the Church Commissioners.

The investigation must identify the formal resolutions and financial assessments supporting that decision.

It should establish which body approved the amount, the date of approval and the conditions attached.

It should also determine whether the commitment was approved as a fixed sum, a phased financial undertaking or another form of institutional allocation.

These distinctions matter because the announcement of a commitment does not automatically establish that money has been transferred.

The Board may authorise a proposed programme while recognising that additional legal and regulatory steps are necessary before implementation.

RNL should therefore distinguish the authority to announce a commitment from the authority to execute a specific financial transaction.

The exact documentary record should be requested.

16.6. The independent Oversight Group

The Church Commissioners established an independent Oversight Group in 2023 to advise on their response to historical connections with African chattel enslavement.

The Group was Black-led and included a majority of members drawn from communities affected by the legacies of enslavement.

It undertook consultation and developed recommendations concerning the proposed fund.

The original membership was publicly announced in July 2023.

The Group subsequently produced a detailed report, which the Commissioners' Board accepted in November 2023 and published in March 2024.

These are documented historical facts.

However, the title *Oversight Group* must not be misunderstood.

The publicly described original function was advisory.

The investigation must establish whether the Group subsequently acquired additional delegated powers or whether it continues primarily to provide advice.

An advisory group is not automatically a trustee board.

Nor does its existence establish that affected communities possess final authority over financial decisions.

16.7. The Oversight Group's terms of reference

The Church Commissioners make the Oversight Group's terms of reference available through their official related-documents collection.

Those terms are an important source for establishing the Group's original responsibilities.

The investigation should examine the formal remit, appointment arrangements, reporting requirements, decision-making procedures and limits of authority.

It should also establish whether the terms were amended during implementation.

This is particularly relevant because the programme has developed over several years.

A document establishing the Group's responsibilities in 2023 may not fully describe arrangements in October 2026.

The investigation should therefore preserve the original terms and request confirmation of any subsequent changes.

Primary source collection:

Church Commissioners — Related documents:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

16.8. The Oversight Group's original leadership

The original Oversight Group was chaired by the Right Reverend Dr Rosemarie Mallett, Bishop of Croydon.

Geetha Tharmaratnam was identified as Vice-Chair.

Their appointments were part of the Commissioners' published governance history.

The involvement of a Church bishop and a finance professional provided leadership across institutional, ethical and financial dimensions.

However, their original appointments do not establish that they currently control the proposed fund.

The investigation must identify whether they continue in their original roles, whether any appointments have changed and whether either has acquired responsibilities within a separate fund entity.

Historical membership should not be confused with current financial authority.

The relevant evidence includes updated terms of reference, appointment documents and governing records.

16.9. Expertise and representation within the original Group

The Oversight Group included people with backgrounds in finance, historical research, theology, law, community development and reparations advocacy.

This range of expertise was relevant to a programme involving both historical responsibility and complex financial arrangements.

However, professional expertise and community representation serve different functions.

An individual may possess investment expertise without being selected to represent an affected community.

Another person may have longstanding campaigning experience without being authorised to speak for every organisation or individual affected by enslavement.

The investigation must therefore establish how membership was determined.

It should examine whether appointments reflected specific professional expertise, community participation, institutional nomination or other selection criteria.

The distinction matters because the presence of Black members does not automatically establish representative authority from all Black/Afrikan communities.

16.10. The original consultation process

The Oversight Group reported undertaking research and consultation involving members of the global African diaspora.

The Church Commissioners' March 2024 announcement stated that the Group sought to centre the voices of communities affected by African chattel enslavement.

This is important evidence of a consultation process.

However, it does not establish that every relevant grassroots organisation was approached or that the process was universally considered satisfactory.

The investigation should examine the consultation methodology.

Relevant matters include how participants were identified, where consultations took place, which organisations contributed, what questions were asked and how responses influenced the recommendations.

Where consultation data are available, they should be preserved in the evidence library.

The Church Commissioners' related-documents page includes questionnaire findings and other Oversight Group material.

These documents may provide a stronger foundation for evaluating consultation than broad statements about participation.

16.11. Consultation does not equal representation

Consultation and representation must remain distinct.

A person may respond to a questionnaire without authorising the institution to speak on their behalf.

An organisation may attend a meeting without endorsing every subsequent decision.

A participant may support the principle of reparatory justice while disagreeing with a particular financial or governance model.

The investigation should therefore examine whether the Commissioners clearly distinguish consultation from consent.

It should also determine whether any participants were presented publicly as representatives of broader communities and, if so, on what authority.

These questions are important because the legitimacy of reparatory governance may depend partly upon the accuracy of claims concerning community participation.

RNL will not presume that a single advisory group represents all descendants of enslaved African people.

16.12. The recommendation for Black-led governance

The Oversight Group's recommendations placed substantial emphasis upon Black leadership.

The proposed fund was intended to respond to historical harms affecting African people and their descendants.

The Group recommended that those affected should be central to the future programme.

This represented more than a proposal to consult Black people occasionally.

It addressed the governance and direction of the reparatory initiative.

However, the term *Black-led* must be defined in relation to actual decision-making powers.

A programme may describe itself as Black-led because its chair or chief executive is Black.

That does not necessarily establish that affected communities control trustee appointments, investments, grants or changes to the fund's purposes.

The investigation should therefore seek the formal definition adopted by the Church Commissioners and any proposed recipient charity.

16.13. Black leadership versus Black community ownership

Leadership and ownership are not identical.

An individual may lead an organisation while the underlying assets remain legally controlled by a different institution.

A fund may employ Black executives while another body retains authority to appoint or remove its trustees.

It may appoint a Black-majority board while reserving important decisions to a founding institution.

These are different governance arrangements.

The Oversight Group recommended eventual Black community ownership and leadership.

The investigation must establish precisely how the Commissioners intend to implement that recommendation.

Relevant questions concern legal ownership of assets, trustee appointment rights, removal powers, reserved powers, investment control and the authority to amend governing documents.

The term *ownership* should not be used as a substitute for these concrete arrangements.

16.14. The proposed Fund for Healing, Repair and Justice

The Commissioners have described plans to establish a new charitable entity for the Fund for Healing, Repair and Justice.

The creation of that entity would introduce a separate governance structure.

However, the official information examined on 18 October 2026 continues to describe the fund as not yet operational.

The investigation must therefore avoid presenting proposed trustees or governing arrangements as fully established unless current regulatory records confirm them.

The appropriate questions concern the intended legal form, charitable objects, registration status and trustee structure.

The proposed governing document should be examined directly.

It may determine who holds assets, who makes decisions, which purposes are permitted and how changes may be authorised.

16.15. Appointment of proposed fund trustees

The method for appointing trustees is fundamental.

Trustees may exercise powers concerning investment policy, grant-making, risk management and financial reporting.

The investigation should therefore establish who will appoint the initial trustees.

It should determine whether the Church Commissioners intend to make all appointments or whether affected communities, independent organisations or other bodies will possess formal appointment rights.

It should also examine the criteria for selection.

Those criteria may include professional competence, experience of reparatory justice, financial expertise, community experience and independence.

A transparent process should explain how those qualities are assessed.

The investigation must not assume that trustees have been appointed merely because the fund's proposed governance has been discussed publicly.

16.16. Independence of the proposed trustee board

The term *independent* can have several meanings.

An independent trustee may not be employed by the founding institution.

A trustee board may possess legal powers separate from the founding institution.

However, its independence may be limited if another body retains substantial authority over appointments, financial policy or amendments to the governing document.

The investigation must therefore examine independence practically.

It should ask whether the Church Commissioners will retain reserved powers.

It should identify whether the proposed fund may alter its investment strategy without permission from the Commissioners.

It should also establish who can approve significant changes in programme purpose.

The objective is to determine the actual balance of authority.

A public description of independence is not a substitute for the legal documentation defining it.

16.17. Delegated authority within the Church Commissioners

Project Spire has involved professional staff, research personnel, advisory groups and implementation workstreams.

These participants may have differing levels of delegated authority.

A programme director may coordinate activity without possessing authority to approve substantial financial transfers.

A research coordinator may commission work within a budget while having no responsibility for investment decisions.

An external adviser may offer recommendations without possessing any formal decision-making powers.

The investigation should therefore seek the organisational chart and delegation schedule applicable to Project Spire.

The documents should identify which decisions are reserved to the Board, which may be made by committees and which may be undertaken by authorised officers.

This is necessary to prevent professional visibility from being mistaken for institutional control.

16.18. The Governance Workstream

The Church Commissioners' March 2025 implementation report identifies a Governance Workstream.

The report states that this workstream had begun foundational planning for a possible charitable entity.

This is a documented step in the programme's development.

However, establishing a workstream does not itself create a new legal institution.

The investigation should identify the workstream's remit, membership, reporting lines and outputs.

It should also establish whether affected communities participated in developing the proposed governance arrangements.

Where recommendations were submitted to the Commissioners' Board, their status should be recorded.

The purpose is to identify how the proposed fund's structure developed from advisory recommendations into formal institutional decisions.

Primary source:

Church Commissioners — *From Commitment to Action: Our Continuing Journey*, 26 March 2025:

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

16.19. The Impact Investment Workstream

The same March 2025 report identifies an Impact Investment Workstream.

Its purpose included exploring a perpetual investment model intended to support communities affected by historical enslavement.

Investment decisions may involve significant financial risks and long-term consequences.

The investigation should therefore establish who developed the proposed investment strategy and what authority the workstream possessed.

It should also identify how investment proposals are reviewed before any capital is committed.

Relevant governance questions concern conflicts of interest, independent due diligence, investment manager selection and the rights of affected communities.

The existence of an investment workstream does not establish that investment capital has already been deployed.

Its proposals and completed transactions must be recorded separately.

16.20. The Grant-Making Workstream

The March 2025 implementation report also identifies a Grant-Making Workstream.

It was developing processes for targeted funding to grassroots initiatives.

This is particularly relevant to community access.

Grant-making governance will determine which organisations may apply, what criteria must be satisfied and who ultimately decides which applications succeed.

The investigation must establish whether a separate grants committee is proposed.

It should identify how that committee would be appointed and whether its decisions could be challenged.

The programme should also explain how applications from smaller organisations will be assessed.

A fund intended to support affected communities should be capable of demonstrating that its procedures are accessible, fair and proportionate.

However, the existence of a Grant-Making Workstream does not establish that grants are currently available.

16.21. The Theology Workstream

The implementation report identifies a Theology Workstream considering repentance, reconciliation and the Church's ethical responsibilities.

This reflects the religious and institutional context within which the Commissioners developed their proposed response.

Theological reasoning may contribute to the institution's understanding of moral responsibility.

However, it must be distinguished from legal authorisation and financial decision-making.

A theological recommendation does not automatically provide statutory authority to transfer charitable assets.

Similarly, the existence of a religious framework does not establish that all affected communities share the same beliefs.

The investigation should therefore examine how theological recommendations influence governance without confusing religious interpretation with legal power.

The fund should also explain how its benefits and consultation arrangements will operate for affected people who do not share the Church's religious commitments.

16.22. Research, Engagement and Communications functions

The March 2025 report describes research, engagement and communications activities supporting the programme.

Earlier sections identified the publicly documented Church Commissioners research and engagement role of Charmaine Simpson and archival activities involving Kwesi Ochosi.

These findings justify questions concerning programme responsibilities and institutional boundaries.

However, the existence of research and engagement responsibilities does not establish authority over the proposed fund.

The investigation should identify the functions carried out by relevant personnel, their reporting arrangements and the procedures governing external activities.

It should also examine how findings from research and consultation are transmitted to the bodies authorised to make decisions.

The movement of information is relevant to accountability.

It should not be confused with the movement of financial authority.

16.23. The documented overlap with the Global Reparations Hub

The previous sections established that Charmaine Simpson and Kwesi Ochosi participated in activities relevant to Project Spire and the GRH launch.

These documentary connections create legitimate questions concerning professional capacities and institutional relationships.

However, the existence of overlapping roles does not establish that Project Spire and the GRH share governance.

Nor does it establish that the Church Commissioners authorised the GRH launch, controlled its finances or delegated decisions to its organisers.

The investigation must therefore seek confirmation of any formal relationship.

It should also establish whether the Church Commissioners' conflict-of-interest policies apply to external reparations activities undertaken by relevant personnel.

The two investigations remain separate.

Their evidence should be cross-referenced only where a documented connection justifies doing so.

16.24. The need for a formal governance map

RNL should construct a governance map showing the relationships between the relevant institutions and decision-making bodies.

The map should identify the Church Commissioners' Board of Governors, the independent Oversight Group, implementation workstreams, authorised officers and proposed fund trustees.

It should also distinguish the Charity Commission's regulatory role.

Any external professional or organisational relationships should be recorded separately.

Each connection should be supported by a primary document.

For example, a formally delegated power should be supported by a Board resolution, governing document or approved delegation schedule.

An advisory relationship should be supported by terms of reference or a formal appointment.

The governance map should not use a line connecting two institutions merely because they share a person or participated in the same public event.

Such a line could incorrectly imply formal control.

16.25. Authority over financial commitments

Financial authority must be examined separately from general programme responsibility.

The Board approved the original £100 million commitment.

However, the implementation of that commitment may require additional decisions, regulatory authorisations and financial procedures.

The investigation should establish who can approve expenditure from relevant budgets.

It should also distinguish research expenditure from the proposed ex gratia transfer and subsequent investment or grant-making.

A professional role within Project Spire does not automatically confer authority over the £100 million.

The relevant financial powers should be confirmed through institutional records.

RNL will not infer control over money from an individual's job title, public appearance or association with a reparations organisation.

16.26. Authority over investment selection

If the proposed fund becomes operational, investment selection may involve trustees, professional investment managers and advisory committees.

The precise arrangements are not yet established by the public records examined.

The investigation should therefore seek the proposed investment governance framework.

It should identify who sets the investment policy, who carries out due diligence and who authorises individual transactions.

It should also establish whether investment managers may receive fees linked to the amount of capital managed or the returns achieved.

These arrangements may create potential conflicts requiring safeguards.

No improper conduct should be presumed.

The objective is to establish transparent procedures appropriate to a reparatory investment programme.

16.27. Authority over grants and beneficiaries

Grant-making presents a different set of governance questions.

The selection of recipients may involve judgments concerning historical connection, community need, organisational capability and the programme's priorities.

The investigation should therefore establish who determines eligibility and who makes final award decisions.

It should also determine whether applicants receive written reasons where their proposals are rejected.

An appeals or independent review process may be important for maintaining confidence.

The fund should distinguish advisers who assess applications from decision-makers who approve grants.

It should also publish appropriate conflict-of-interest procedures.

These arrangements will be particularly important to independent grassroots Black/Afrikan organisations seeking fair access.

16.28. Conflicts of interest: the general principle

A conflict of interest may arise when an individual's obligations or interests could affect their impartiality in performing a particular duty.

Potential conflicts may involve financial relationships, professional appointments, organisational affiliations, family connections or other relevant interests.

However, the existence of multiple professional roles does not automatically establish an improper conflict.

The investigation must identify whether a relevant interest existed in relation to an identifiable decision.

It should then determine what disclosure and management procedures applied.

A conflict may be properly managed through declaration, recusal, independent review or other safeguards.

The purpose of these procedures is not necessarily to prevent every professional association.

It is to ensure that decisions are made lawfully, fairly and transparently.

16.29. Conflicts arising from professional appointments

Project Spire has employed or engaged people with expertise in historical research, engagement and other fields.

Some individuals may also hold positions in external organisations.

These arrangements can provide valuable experience.

However, the investigation should establish whether external interests are declared and whether appropriate restrictions apply.

For example, a person involved in developing beneficiary criteria might have an external association with an organisation that could later seek funding.

Such circumstances may require consideration of conflicts.

The existence of the association alone does not establish that an improper decision occurred.

The investigation must therefore distinguish a potential conflict from an actual conflict and from proven misconduct.

Each category requires different evidence.

16.30. Conflicts involving investment managers and advisers

A proposed reparatory investment fund may engage professional investment managers, consultants and other advisers.

Those persons may receive fees, hold investments or possess relationships with potential counterparties.

Appropriate governance requires transparent procedures for identifying such interests.

The investigation should establish whether procurement, appointment and investment decisions are subject to independent scrutiny.

It should also determine whether advisers may recommend transactions from which they or associated organisations could benefit financially.

Where such arrangements exist, the applicable safeguards should be identified.

No financial conflict should be alleged without supporting evidence.

The purpose is to establish that the proposed institutional structure is capable of preventing inappropriate influence.

16.31. Community representation and conflicts of interest

Community representation may introduce legitimate questions concerning overlapping loyalties.

A representative of a grassroots organisation may participate in fund governance while their organisation has an interest in future grant opportunities.

That does not automatically make participation inappropriate.

Indeed, excluding all community representatives with practical experience could undermine the fund's stated objectives.

The appropriate response is to develop transparent procedures that permit meaningful participation while managing specific conflicts.

For example, a representative might contribute to general programme design while withdrawing from a decision concerning their own organisation.

The investigation should establish whether Project Spire proposes such arrangements.

Community experience should be recognised without abandoning financial accountability.

16.32. The distinction between independence and absence of accountability

An independent fund should not be beyond scrutiny.

Independence from the Church Commissioners may be desirable in certain aspects of governance.

However, the fund must still have identifiable trustees, governing documents, financial accounts and regulatory obligations.

The investigation should therefore examine how independence will be balanced with accountability.

It should determine whether the fund will publish annual accounts, investment policies, grant awards and measurable outcomes.

It should also identify who can investigate complaints.

The objective is not to replace institutional control with an absence of control.

It is to establish legitimate, transparent and reviewable decision-making arrangements.

16.33. Institutional safeguards against anti-Black racism

RNL seeks evidence of safeguards against the possibility of anti-Black racism and Institutional Racism within Project Spire's governance.

The programme is intended to address historical harm arising from the enslavement and exploitation of African people.

It is therefore particularly important that its decision-making arrangements be capable of preventing discriminatory outcomes.

Relevant safeguards may include transparent appointment criteria, independent recruitment procedures, meaningful consultation, written reasons for decisions and accessible complaints processes.

The existence of a Black-led Oversight Group does not automatically establish that every aspect of the programme is protected from racial bias.

Nor does asking about safeguards constitute an accusation that discrimination has occurred.

The investigation seeks written evidence of the systems in place.

16.34. The possibility of Institutional Racism in governance decisions

RNL specifically seeks recognition that Institutional Racism may be a possibility within decision-making processes where safeguards are absent or ineffective.

An institution may possess equality policies while still requiring examination of how those policies operate in practice.

The investigation should therefore ask whether the Commissioners have assessed the risk of unequal treatment in consultation, appointments, investment selection and grant-making.

It should also establish whether affected persons can obtain independent review where they consider that a decision has been influenced by racial bias.

These are preventative governance questions.

RNL makes no accusation against a named individual.

No conclusion has been reached that anti-Black racism or Institutional Racism has affected Project Spire decisions.

The purpose is to establish the presence and effectiveness of safeguards.

16.35. The importance of written institutional communication

A governance structure should provide accessible and reliable channels through which questions may be submitted and answered.

The Church Commissioners' official enquiry page invites questions concerning the proposed fund and indicates an aim to respond within 30 working days.

This is a documented communication arrangement.

However, an invitation to submit questions is not itself proof that every enquiry receives a complete or timely response.

The investigation should distinguish published service standards from actual performance.

It should also determine whether complex financial or governance questions are directed to appropriately authorised officers.

RNL's own approach is to maintain a written documentary record.

Written responses allow institutional statements to be preserved, compared and assessed without relying upon informal recollections.

16.36. A right of reply for institutions and individuals

The governance investigation identifies several institutions and individuals whose roles require clarification.

They should have a fair opportunity to explain their responsibilities.

A published biography may provide only a summary of a professional position.

An advisory appointment may change over time.

A proposed governance arrangement may be revised before legal registration.

These possibilities should remain open.

Where an institution provides documentary clarification, RNL should incorporate that clarification.

Where a response corrects an error, the correction should be recorded transparently.

Where a question remains unanswered, that position should be documented without treating silence as automatic evidence of wrongdoing.

Professional fairness is necessary to the credibility of the investigation.

16.37. Governance as a safeguard for peace

RNL maintains that transparency, competent organisation and accountable decision-making are essential preventative foundations for peace.

Reparatory justice involves historical suffering, community expectations and potentially substantial financial resources.

Disputes concerning who controls the money, who represents affected communities and who may receive benefits can become serious where governance is unclear.

The possibility of intimidation, threats of violence or physical violence must therefore be recognised as a matter for responsible prevention.

This is not a prediction that violence will occur.

It is not an accusation that any participant has threatened violence.

The investigation seeks to reduce the possibility of escalation through early clarification, fair procedures, reliable information and lawful, peaceful engagement.

Governance should help prevent disputes before they become entrenched.

16.38. The need for an independent governance audit

RNL should seek enough documentary material to construct an independently reviewable governance audit.

The audit should identify each relevant institution, governing body, committee and delegated officer.

It should record the origin, scope and duration of each authority.

It should also identify appointments, selection procedures, conflicts-of-interest policies, financial approval limits and complaints mechanisms.

Where relevant records are unavailable, that limitation should be stated.

Where the fund remains in development, proposed arrangements should not be presented as final.

The purpose is to establish an institutional reference library that can be updated as Project Spire develops.

This will allow future researchers to compare original promises with implemented governance arrangements.

16.39. Priority questions concerning the Church Commissioners' Board

Question 16.1: Which Church Commissioners governing body holds final responsibility for Project Spire?

Question 16.2: What formal resolutions authorised the original £100 million commitment?

Question 16.3: Which decisions concerning Project Spire remain reserved to the Board of Governors?

Question 16.4: Which responsibilities have been delegated to committees or officers?

Question 16.5: What financial approval limits apply to those delegated responsibilities?

Question 16.6: Who is accountable for the programme's regulatory applications?

Question 16.7: What internal governance reports are prepared for the Board?

Question 16.8: What public information is available concerning those decisions?

Question 16.9: What procedures permit decisions to be reviewed or corrected?

Question 16.10: How does the Board assess compliance with its charitable obligations?

16.40. Priority questions concerning the Oversight Group

Question 16.11: What were the original terms of reference of the Oversight Group?

Question 16.12: What authority did the Group possess beyond providing recommendations?

Question 16.13: Who selected and appointed its members?

Question 16.14: What criteria governed appointments?

Question 16.15: What consultation process informed its recommendations?

Question 16.16: Which recommendations were formally accepted by the Commissioners' Board?

Question 16.17: Which recommendations have been implemented?

Question 16.18: Which recommendations remain outstanding or have been modified?

Question 16.19: What is the Group's present status?

Question 16.20: Do its members have any continuing governance or financial authority concerning the proposed fund?

16.41. Priority questions concerning the proposed fund

Question 16.21: Has the Fund for Healing, Repair and Justice been registered as a separate charity?

Question 16.22: If so, what is its registration number and governing document?

Question 16.23: What charitable objects govern the use of its resources?

Question 16.24: Who appoints its trustees?

Question 16.25: What powers will the Church Commissioners retain?

Question 16.26: How will Black community ownership and leadership be implemented?

Question 16.27: What rights will affected communities possess in relation to governance?

Question 16.28: Can trustees be removed by an institution other than the fund itself?

Question 16.29: Who may amend the fund's governing document?

Question 16.30: What independent audit and regulatory reporting requirements will apply?

16.42. Priority questions concerning delegated authority

Question 16.31: Who leads the Governance Workstream?

Question 16.32: Who leads the Impact Investment Workstream?

Question 16.33: Who leads the Grant-Making Workstream?

Question 16.34: Who leads the Theology Workstream?

Question 16.35: What responsibilities are assigned to research, engagement and communications personnel?

Question 16.36: What written delegation schedules define those responsibilities?

Question 16.37: Who authorises external professional appointments?

Question 16.38: Who can approve expenditure on research and programme development?

Question 16.39: Who will approve investments and grants once the fund becomes operational?

Question 16.40: How are decisions reported to the responsible trustees?

16.43. Priority questions concerning conflicts of interest

Question 16.41: What conflict-of-interest policies apply to Project Spire?

Question 16.42: Are external professional and organisational roles subject to declaration requirements?

Question 16.43: How are relevant interests recorded?

Question 16.44: When must a person withdraw from a decision?

Question 16.45: Are conflict-of-interest registers independently reviewed?

Question 16.46: What safeguards apply where advisers or trustees have relationships with potential beneficiaries?

Question 16.47: What safeguards apply to investment managers and consultants?

Question 16.48: How are procurement decisions protected from inappropriate influence?

Question 16.49: What procedures permit members of the public to report possible conflicts?

Question 16.50: What information concerning conflicts can be disclosed publicly without compromising legitimate confidentiality?

16.44. Priority questions concerning the documented personnel overlap

Question 16.51: What were Charmaine Simpson's precise responsibilities within Project Spire-related work?

Question 16.52: What were Kwesi Ochosi's precise responsibilities within relevant archival research activities?

Question 16.53: Which institutions commissioned or supervised those roles?

Question 16.54: Did either person possess delegated authority concerning investment or grant-making decisions?

Question 16.55: Were external reparations activities subject to applicable institutional policies?

Question 16.56: Did the Church Commissioners possess any formal governance relationship with the Global Reparations Hub?

Question 16.57: Did any Project Spire committee authorise or support GRH-related activities?

Question 16.58: Were any relevant conflicts of interest identified and managed?

Question 16.59: What public clarification can be provided concerning the boundaries between the organisations?

Question 16.60: Will the Commissioners confirm the institutional capacities in which relevant personnel acted?

16.45. Priority questions concerning community participation and safeguards

Question 16.61: What definition of *Black-led* governance has Project Spire adopted?

Question 16.62: What definition of community ownership has been adopted?

Question 16.63: How are affected communities identified?

Question 16.64: What procedures govern the selection of community representatives?

Question 16.65: How can independent grassroots organisations participate without surrendering their organisational independence?

Question 16.66: How will disagreements among affected communities be managed?

Question 16.67: What safeguards exist against the possibility of anti-Black racism and Institutional Racism?

Question 16.68: What independent complaints and appeals arrangements will be available?

Question 16.69: What preventative procedures exist for addressing serious disputes and avoiding intimidation or threats of violence?

Question 16.70: Will the fund publish a complete governance and accountability framework before receiving or deploying the committed capital?

16.46. Preliminary findings

The available records establish that the Church Commissioners' Board approved the original £100 million commitment and accepted the Oversight Group's report.

The Oversight Group was established as an independent advisory body and developed recommendations concerning the proposed reparatory fund.

The Group's recommendations included a larger financial ambition, increased speed of implementation, Black leadership, community engagement, impact investment and grant-making.

The Commissioners' March 2025 implementation report identifies distinct workstreams for governance, impact investment, grants and theology, supported by research, engagement and communications activities.

These records establish an identifiable programme-development structure.

However, the publicly available information examined does not provide a complete current governance chart showing the authority of every officer, adviser, committee and proposed trustee.

Nor does it establish that the proposed fund has become operational.

The exact arrangements for Black community ownership, trustee appointments, investment approval, grant-making and independent complaints remain subject to verification.

The documented overlapping involvement of individuals associated with Project Spire-related work and the GRH launch warrants clarification of institutional boundaries.

It does not establish common governance or financial control.

16.47. Conclusion: governance must be tested through actual authority

The Church Commissioners have established a documented institutional process for developing Project Spire.

The process includes Board decisions, an independent Oversight Group, published recommendations and implementation workstreams.

These steps are significant.

However, the existence of advisory bodies and programme structures does not automatically establish that affected communities possess legal authority over the proposed fund.

The investigation must therefore move beyond titles and public descriptions.

It must determine who appoints trustees, who controls assets, who authorises investments, who approves grants and who can challenge decisions.

The Oversight Group's recommendations concerning Black community leadership and ownership provide important benchmarks.

Their actual implementation must be examined through governing documents and formal decisions.

The investigation must also identify effective safeguards against anti-Black racism, Institutional Racism, conflicts of interest and inappropriate influence.

The documented involvement of individuals in multiple reparations activities makes transparency concerning institutional capacities especially important.

However, association alone must not be converted into allegations of wrongdoing.

The central conclusion of Section 16 is that Project Spire has a documented institutional and advisory governance history, but the final distribution of legal

authority, financial control, community representation and independent accountability cannot yet be treated as fully established.

RNL will continue to examine governance through documentary evidence, written institutional clarification, fair rights of reply and independently verifiable decision-making arrangements.

The objective is a reparatory process in which authority is clear, affected communities possess meaningful participation, financial decisions are accountable and disputes can be resolved peacefully.

SECTION 16 — GOVERNANCE AND AUTHORITY EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-16-001	Church Commissioners' Board approved original £100 million commitment	Official institutional record
SPIRE-16-002	Board accepted Oversight Group recommendations in November 2023	Official institutional record
SPIRE-16-003	Independent Oversight Group appointed in 2023	Official institutional record
SPIRE-16-004	Oversight Group's original terms of reference published	Official document collection
SPIRE-16-005	Oversight Group chaired by Bishop Rosemarie Mallett	Official historical appointment
SPIRE-16-006	Geetha Tharmaratnam appointed Vice-Chair	Official historical appointment
SPIRE-16-007	Group Black-led with majority of members from affected communities	Commissioners' published description
SPIRE-16-008	Recommendations concerning Black-led governance and community participation	Published Oversight Group report
SPIRE-16-009	Governance Workstream	Official implementation report

SPIRE-16-010	Impact Investment Workstream	Official implementation report
SPIRE-16-011	Grant-Making Workstream	Official implementation report
SPIRE-16-012	Theology Workstream	Official implementation report
SPIRE-16-013	Research, Engagement and Communications functions	Official implementation report
SPIRE-16-014	Proposed separate Fund for Healing, Repair and Justice	Official institutional intention
SPIRE-16-015	Complete current trustee appointment arrangements	Verification required
SPIRE-16-016	Final delegated financial authority	Verification required
SPIRE-16-017	Actual implementation of Black community ownership	Not established
SPIRE-16-018	Current conflict-of-interest register and operating safeguards	Documentary verification required
SPIRE-16-019	Formal Project Spire–GRH governance relationship	Not established
SPIRE-16-020	Independent complaints and appeals mechanisms for the future fund	Verification required

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SOURCES AND INDEPENDENT VERIFICATION

Source 16.1 — Church Commissioners, 4 March 2024

Church Commissioners for England warmly welcomes Oversight Group's report.

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

Relevant evidence: Board acceptance, Oversight Group recommendations, Black leadership, investment and grants.

Source 16.2 — Church Commissioners, 26 March 2025

From Commitment to Action: Our Continuing Journey.

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

Relevant evidence: Governance, Investment, Grant-Making and Theology Workstreams, and implementation activities.

Source 16.3 — Church Commissioners' related documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Relevant evidence: Oversight Group terms of reference, consultation findings and original recommendations.

Source 16.4 — Oversight Group report

Fund for Healing, Repair and Justice: Recommendations to the Church Commissioners.

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Relevant evidence: Governance proposals, community involvement, fund structure, investment and grant-making.

Source 16.5 — Church Commissioners' response

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/our-response

Relevant evidence: Official institutional response and continuing implementation.

Source 16.6 — UK Parliament, 19 November 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88600

Relevant evidence: Board assessment of legal responsibilities, CC27 guidance, new charity registration and regulatory authorisation.

Source 16.7 — Church Commissioners, 19 January 2026

Response to parliamentarians' concerns concerning Project Spire.

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Relevant evidence: Institutional governance explanations, scrutiny and accountability.

Source 16.8 — Church Commissioners' FAQs

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Relevant evidence: Proposed fund arrangements, investment and grant-making structure, and implementation position.

Source 16.9 — Official operational status

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Relevant evidence: The fund remains in implementation and is not yet operational.

Source 16.10 — Charity Commission trustee decision-making guidance

https://www.gov.uk/government/publications/its-your-decision-charity-trustees-and-decision-making

Relevant evidence: General trustee decision-making principles and institutional responsibilities.

END OF SECTION 16 — GOVERNANCE AND DECISION-MAKING: THE CHURCH COMMISSIONERS' BOARD, PROJECT SPIRE OVERSIGHT GROUP, PROPOSED FUND TRUSTEES, BLACK COMMUNITY LEADERSHIP, DELEGATED AUTHORITY AND CONFLICTS OF INTEREST

NEXT: SECTION 17 OF 24 — COMMUNITY CONSULTATION AND REPRESENTATION: WHO WAS CONSULTED, WHO WAS NOT, BLACK/AFRIKAN GRASSROOTS PARTICIPATION, COMMUNITY CONSENT, ACCESSIBILITY AND THE RIGHT TO CHALLENGE.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 17 OF 24

COMMUNITY CONSULTATION AND REPRESENTATION: WHO WAS CONSULTED, WHO WAS NOT, BLACK/AFRIKAN GRASSROOTS PARTICIPATION, COMMUNITY CONSENT, ACCESSIBILITY AND THE RIGHT TO CHALLENGE

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Published consultation activities and participation figures identified. The completeness, accessibility, representativeness, influence and continuing effectiveness of consultation require further investigation.

17.1. Purpose of this section

This section examines the consultation and community engagement arrangements developed by the Church Commissioners for England and the independent Oversight Group in connection with Project Spire and the proposed Fund for Healing, Repair and Justice.

The investigation considers who participated, which communities were approached, how information was collected, what concerns participants expressed and whether their contributions influenced the programme's subsequent development.

It also addresses the distinction between consultation, representation, consent, institutional membership and decision-making authority.

These distinctions are particularly important in reparatory justice.

The experience of African chattel enslavement and its continuing consequences is not confined to one organisation, geographical location, religious tradition, professional network or contemporary political movement.

Affected communities may include people in Africa, the Caribbean, Britain, the Americas and elsewhere.

They may possess different understandings of historical responsibility and different priorities concerning financial reparations, cultural restoration, education, land, health, governance and economic development.

No single individual or organisation can automatically be assumed to represent all these interests.

The investigation must therefore examine the actual consultation process rather than presume that the presence of selected Black participants establishes general community consent.

Equally, a consultation exercise involving substantial participation should not be dismissed merely because some individuals or organisations were unaware of it.

The objective is to establish what the evidence supports and identify what remains uncertain.

17.2. Why consultation matters in reparatory justice

Consultation provides a means through which institutions can hear from people affected by their decisions.

In reparatory justice, its importance extends beyond administrative good practice.

An institution proposing to address historical exploitation must consider whether the people and communities affected have meaningful opportunities to influence the proposed response.

A programme developed entirely through institutional decision-making, without appropriate community participation, may risk repeating imbalances of power that the programme itself seeks to address.

However, consultation must be examined in terms of its actual structure.

A public questionnaire may collect useful views without establishing a representative mandate.

A meeting may provide opportunities for discussion without transferring decision-making authority.

An advisory group may make substantial recommendations while remaining subordinate to a governing board.

A legitimate consultation process should therefore make clear what decisions remain open, what influence participants may exercise and how their contributions will be assessed.

17.3. The Church Commissioners' documented consultation programme

The Church Commissioners' official Frequently Asked Questions provide a specific account of consultation undertaken during 2023.

The Commissioners state that, in October 2023, they hosted engagement events intended to obtain views from stakeholders belonging to communities affected by the legacy of African chattel enslavement.

They also launched a global survey targeted at those communities.

According to the Commissioners, **1,106 people participated through the combined engagement routes**.

This is a material finding.

It establishes that the Church Commissioners publicly report a consultation exercise involving more than one thousand participants.

The investigation must recognise the existence of that reported engagement.

However, the total does not independently establish the number of different organisations represented, whether participants were selected through a representative sampling method or whether every relevant community had a reasonable opportunity to participate.

Those matters require examination of the original consultation data.

Primary source:

Church Commissioners — Frequently Asked Questions:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

17.4. The geographical scope of consultation

The Oversight Group's March 2024 report describes online and in-person engagement between January and October 2023.

It identifies activities undertaken in England, Jamaica, Barbados and Ghana.

The report also describes a global questionnaire receiving responses from several regions.

The published geographical distribution was approximately:

Region	Share of questionnaire respondents

Europe, predominantly the United Kingdom	61.7%
Africa	17.8%
Caribbean	14.9%
North and South America, Asia and Australia/Oceania combined	5.6%

These figures describe the geographical distribution of questionnaire respondents, not necessarily all 1,106 people who participated through the combined engagement routes.

They must not be presented as a statistically representative distribution of the global African diaspora.

The figures nevertheless provide useful evidence of the geographical reach of the exercise.

Primary source:

Oversight Group Report, March 2024:

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

17.5. The importance of distinguishing global reach from global representation

A consultation exercise may receive responses from several continents without representing the full range of people living on those continents.

For example, questionnaire participation may depend on access to information, language, internet connectivity, institutional networks and willingness to engage.

Responses obtained primarily through organisations already connected to the programme may differ from those that would be obtained through broader community outreach.

These possibilities do not invalidate the consultation.

They identify methodological issues requiring examination.

The investigation should determine how the questionnaire was distributed, which networks were used and whether the organisers assessed differences in access.

It should also establish whether the engagement process was intended as an open consultation, a representative survey, a qualitative research exercise or a combination of methods.

The stated purpose determines how the results should properly be interpreted.

17.6. The five facilitated events in England

The Oversight Group's report states that five facilitated events were held in England during October 2023.

These included a dedicated panel intended to engage younger stakeholders.

This is an important aspect of the consultation record.

It indicates that the process was not confined to an online questionnaire.

The use of facilitated discussions may permit participants to explain concerns in greater depth and respond to ideas raised by others.

However, the published headline does not identify the complete participant list, attendance at each event or the process by which participants were invited.

The investigation should therefore seek the event dates, locations, invitation arrangements, attendance figures and published summaries.

Where participant identities are protected for legitimate privacy reasons, anonymised organisational and demographic information may still support an assessment of reach and accessibility.

17.7. Engagement activities in Jamaica, Barbados and Ghana

The Oversight Group report identifies engagement in Jamaica, Barbados and Ghana.

These locations are significant because the historical consequences of transatlantic African chattel enslavement affected both African societies and Caribbean communities.

However, consultation within one location cannot automatically establish representation of an entire country or region.

The investigation should determine who organised each engagement activity, which institutions were approached and what opportunities were available to independent community organisations.

It should also identify whether relevant national reparations commissions, local groups, historians, descendants and cultural organisations participated.

No specific body should be assumed to have been included without documentary evidence.

The purpose is to establish the scope and nature of consultation accurately.

17.8. The themes emerging from consultation

The Oversight Group's report records that participants raised a wide range of concerns and priorities.

Some expressed cautious optimism about the proposed response.

Others raised serious concerns about the history of enslavement, the scale of harm, cultural identity, economic inequality and the need for meaningful repair.

The report identifies priorities concerning health, education, economic empowerment, land, food, cultural restoration and community development.

It also recognises that money alone cannot address every historical harm.

These findings demonstrate that the consultation generated substantive material rather than merely expressions of general support.

The investigation should therefore examine how the Group translated this material into recommendations.

It should distinguish priorities identified by participants from decisions subsequently taken by the Church Commissioners.

17.9. The consultation's treatment of reparations

The Oversight Group's report expressly recognises reparations as an important historical and contemporary framework for communities descended from enslaved African people.

It refers to longstanding reparations demands and identifies historical campaigns, including the work of Marcus Garvey and Bernie Grant.

It also refers to CARICOM's reparations framework.

This is significant because it places the proposed fund within a wider history of reparatory justice.

However, recognition of the reparations movement does not automatically establish that its various organisations were formally consulted.

The investigation must distinguish acknowledgement of historical campaigners from engagement with their contemporary organisations and successors.

The report's discussion of reparations is documentary evidence of the advisory group's stated approach.

The extent of direct consultation with particular reparations organisations requires separate verification.

17.10. The Oversight Group's recommendations concerning continued engagement

The Oversight Group recommended that the fund should be guided by ongoing engagement with affected communities.

It also called for transparency, community participation and the public reporting of outcomes.

These recommendations are significant because they recognise consultation as a continuing responsibility rather than a one-time preliminary exercise.

The investigation should therefore establish whether the Commissioners adopted a formal continuing engagement strategy.

That strategy should identify how people may participate during the development of the fund and after it becomes operational.

It should also explain how feedback influences investment policies, grant-making criteria and governance.

An institution may complete a preliminary consultation while still requiring further participation as decisions evolve.

The success of the initial exercise does not eliminate that continuing obligation.

17.11. The question of who was not consulted

One of the most difficult investigative questions concerns organisations and communities that did not participate.

A published list of participants may establish who attended a consultation.

It cannot automatically establish every organisation that was unaware of the exercise or unable to participate.

Similarly, a person stating that they were not consulted provides evidence concerning their own experience but does not establish the position of every other organisation.

The investigation should therefore avoid making unsupported universal claims.

Instead, it should identify particular organisations that report non-participation and ask whether they were invited, notified or otherwise given an opportunity to contribute.

Where an organisation was not approached, the Commissioners should be invited to explain the selection criteria.

The question is whether the consultation process was sufficiently open, accessible and appropriate to its purpose.

17.12. Longstanding grassroots reparations organisations

Independent grassroots Black/Afrikan reparations organisations may possess considerable historical knowledge and practical experience.

Some have campaigned for reparations for decades.

Others have preserved community records, organised educational activities, conducted research or made representations to governments and institutions.

Their contributions may be relevant to the development of Project Spire.

The investigation should determine whether the Commissioners maintained a transparent method for identifying and contacting such organisations.

It should also ask whether organisations could nominate themselves for participation.

A process limited to selected institutional partners may overlook groups operating outside established professional networks.

However, the existence of institutional contacts does not establish that the Commissioners deliberately excluded other organisations.

The investigation must establish what actually occurred.

17.13. The relevance of Empress Judah's concerns

Empress Judah's correspondence of 18 October 2026 principally concerned the launch of the Global Reparations Hub.

She reported dissatisfaction with consultation arrangements and questioned whether longstanding grassroots reparations organisations had been adequately involved.

Her correspondence also referred to earlier Church-related events.

These concerns provide context for the separate Project Spire enquiry.

However, evidence concerning consultation for the GRH must not be automatically transferred to Project Spire.

The programmes are institutionally distinct.

The fact that an organisation reports not being consulted about the GRH does not establish that it was omitted from Project Spire's 2023 consultation.

Similarly, participation in Project Spire's consultation does not establish endorsement of the GRH.

Each process requires its own evidence.

17.14. The importance of organisational records

The investigation should seek a consultation register identifying organisations invited, contacted or represented.

Such a register could include dates, organisational categories, geographical locations and the nature of participation.

However, the publication of personal information must respect applicable privacy obligations.

It may be possible to publish institutional names and aggregate participation information without disclosing private details of individual respondents.

The objective is not to expose confidential participants.

It is to establish whether the consultation process had sufficient breadth and whether claims concerning community participation are supported by records.

Where a complete register does not exist, the Commissioners should explain how consultation coverage was assessed.

17.15. Consultation versus consent

Consultation is not equivalent to consent.

A person may participate in discussion without agreeing with the institution's proposals.

An organisation may submit criticism without endorsing the final programme.

A questionnaire respondent may express priorities while rejecting the proposed financial model.

For these reasons, an institution should not treat the number of people consulted as the number who support its decisions.

The investigation should identify whether the Commissioners distinguish consultation from endorsement in their public statements.

It should also examine how dissenting views were recorded.

Meaningful consultation permits disagreement.

The absence of unanimity does not necessarily invalidate a consultation process.

However, the representation of participation as consent without evidence could mislead the public.

17.16. Representation versus decision-making authority

Representation concerns the basis on which a person speaks or acts for others.

Decision-making authority concerns the legal or organisational power to determine outcomes.

These concepts may overlap, but they are not identical.

A person may be selected as a community representative while holding only an advisory role.

An individual may possess trustee authority without having been elected by affected communities.

A consultation participant may possess neither representative nor decision-making authority.

The investigation must therefore examine how Project Spire defines community representation.

It should establish who selects representatives, to whom they are accountable and whether the affected communities possess any mechanism for replacing them.

The existence of Black participants within the Oversight Group is a relevant fact.

It does not automatically establish a representative mandate from all Black/Afrikan communities.

17.17. Membership and institutional authority

Participation in a consultation does not make an individual a member of the Church Commissioners or the proposed fund.

Membership of an advisory group does not automatically confer trusteeship.

Trusteeship does not automatically establish representation of all potential beneficiaries.

Likewise, a person identifying with a community does not automatically possess authority to make decisions on behalf of everyone sharing that identity.

These distinctions are particularly important where public communications describe initiatives as community-led or community-owned.

RNL should require precise definitions.

The investigation must identify the actual rights attached to each form of participation.

The purpose is to prevent ambiguity over who can speak, decide, approve expenditure or challenge decisions.

17.18. The legitimacy of disagreement within affected communities

Communities affected by African chattel enslavement are not required to hold identical views concerning reparatory justice.

Some individuals may favour direct compensation.

Others may support collective investment or institutional restoration.

Some may prioritise land, education, cultural heritage or political recognition.

Others may question whether the proposed programme adequately addresses historical responsibility.

A transparent consultation process must be capable of recording these disagreements.

It should not treat dissent as evidence that a person is opposed to reparatory justice.

Nor should support for a particular institutional model be treated as the only legitimate community position.

The investigation should establish how Project Spire handles competing priorities and explains decisions taken where consensus is absent.

17.19. Religious inclusion and institutional identity

Project Spire was developed by the Church Commissioners.

Its published approach includes theological principles and the Church's understanding of repentance and repair.

That context should be recognised.

However, African chattel enslavement affected people belonging to many religious, spiritual and cultural traditions.

Affected descendants may be Christian, follow African traditional religions, belong to other faiths or have no religious affiliation.

The investigation should determine whether consultation and future funding arrangements are accessible irrespective of religious belief.

It should establish whether participation requires acceptance of particular theological positions.

The existence of a Christian institutional motivation does not automatically establish that the fund excludes others.

The actual eligibility and consultation rules must be examined.

17.20. Language and geographical accessibility

A global consultation process may face language and communication barriers.

Potential participants may have different levels of internet access, literacy, disability-related access requirements and familiarity with institutional procedures.

The investigation should therefore establish whether translated information was available.

It should determine whether people could participate through correspondence, telephone, in-person meetings or other accessible means.

It should also consider whether the timing and location of events created practical barriers.

The relevant question is not simply whether a questionnaire was technically open to everyone.

It is whether reasonable steps were taken to enable meaningful participation by the intended communities.

No particular access failure should be presumed without evidence.

17.21. The significance of the respondent distribution

The published questionnaire results show that a majority of respondents were based in Europe, predominantly the United Kingdom.

This is relevant when considering the fund's intended global reach.

The distribution does not establish that consultation outside Europe was ineffective.

It does, however, provide grounds for asking whether the programme considered geographical imbalances and whether additional engagement was undertaken in underrepresented regions.

The investigation should identify whether the distribution influenced the recommendations.

It should also determine whether respondents' geographical locations were used in a way appropriate to the consultation's stated objectives.

A global programme should be transparent about the relationship between consultation coverage and global policy decisions.

17.22. The treatment of younger participants

The Oversight Group described a dedicated engagement panel for younger stakeholders.

This is a documented feature of the consultation.

It recognises that reparatory justice concerns both present and future generations.

However, the existence of a youth panel does not establish that younger people had continuing representation in governance.

The investigation should determine what views were expressed, how those views influenced recommendations and whether further youth engagement is planned.

Younger people may have different priorities concerning education, employment, housing, technology and economic opportunity.

Their participation should therefore be considered substantively rather than merely as a demographic category.

17.23. Consultation with people directly connected to historical claims

An important question concerns whether consultation distinguished broad experiences of racial inequality from specific historical connections to the institutions and transactions examined in Project Spire.

The Church Commissioners' research identified financial relationships involving Queen Anne's Bounty and African chattel enslavement.

The proposed fund is intended to address continuing consequences of that history.

However, the investigation should establish whether particular descendant communities or historically affected locations were identified.

It should also determine how the programme balanced historically specific claims with wider contemporary disadvantage.

These are not necessarily mutually exclusive objectives.

They do, however, require transparent explanation.

A reparatory initiative should be able to identify how its intended beneficiaries relate to the harms it seeks to address.

17.24. The relationship between consultation and financial eligibility

Consultation participation should not automatically confer entitlement to funding.

Equally, failure to participate in an initial consultation should not automatically exclude an otherwise eligible organisation from future grants.

The investigation should establish whether Project Spire has adopted or proposes any connection between consultation involvement and financial eligibility.

This is particularly important for organisations that may have been unaware of the original consultation.

The fund should clearly distinguish participation in programme design from eligibility to receive financial support.

If previous engagement affects future decisions, the basis should be explained and justified.

There is currently insufficient evidence to conclude that such preferential treatment exists.

The purpose is to establish safeguards before the fund becomes operational.

17.25. Community engagement and the proposed governance structure

The Oversight Group recommended that affected communities should be central to the fund's governance and continuing development.

However, consultation and governance remain distinct stages.

The Commissioners' subsequent implementation work includes development of a proposed charitable entity and its governing structure.

The investigation should establish whether the consultation findings influenced trustee-selection arrangements, grant-making processes and investment policy.

It should also determine whether participants had an opportunity to examine subsequent proposals before they were finalised.

A consultation exercise may identify preferences that are later modified for legal or practical reasons.

Where that occurs, an accountable institution should explain the changes.

The investigation must distinguish original recommendations from adopted governance arrangements.

17.26. How should institutions respond to criticism of consultation?

An organisation receiving criticism about consultation should be able to explain its procedures.

It may provide records identifying invitations, meetings, questionnaires and responses.

It may also acknowledge limitations or describe improvements.

The existence of criticism does not automatically establish that the consultation was defective.

However, citing a large participation figure does not answer every question concerning selection, accessibility or influence.

The appropriate response should address the specific issue raised.

For example, a question about the omission of a particular grassroots organisation requires information about the relevant invitation and outreach process.

A question about whether participants influenced decisions requires evidence connecting consultation findings to later institutional choices.

RNL will seek such explanations rather than substitute assumptions.

17.27. The right to challenge decisions

The ability to raise questions after consultation is essential.

Affected communities should not be required to accept every subsequent decision merely because an earlier consultation occurred.

The investigation should establish whether Project Spire provides procedures for challenging inaccurate information, exclusion from engagement or potentially unfair decisions.

It should also determine how disputes about community representation can be addressed.

Once the fund becomes operational, the availability of complaints and independent review procedures will become especially important.

An applicant may disagree with a funding decision.

A community organisation may question eligibility rules.

An individual may raise concerns about conflicts of interest or racial bias.

The programme should provide clear channels through which such matters can be examined fairly.

17.28. The Church Commissioners' published enquiry mechanism

The Church Commissioners maintain a public page inviting questions and feedback concerning their historical research and proposed response.

The page states that enquiries may concern historical findings, practical arrangements or personal experiences of the legacies of enslavement.

It also states that the Commissioners aim to respond within 30 working days because of the volume of enquiries.

This is an identifiable institutional communication mechanism.

However, an aim to respond within 30 working days is not an absolute guarantee.

The investigation should establish how complex questions are allocated to responsible officers.

It should also determine whether correspondence is recorded and whether unresolved questions are carried forward.

The existence of a public enquiry channel is a useful step.

Its effectiveness must be assessed through actual responses and the completeness of information provided.

Primary source:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

17.29. Written correspondence and the permanent documentary record

RNL's investigation requires written, source-linked communication.

This approach permits institutional responses to be preserved, compared and examined over time.

It reduces the possibility of misunderstanding concerning what was asked and how an institution responded.

Written communication also makes it easier to identify unanswered questions.

The investigation should record the date of each enquiry, the institution contacted, the substance of the questions, the response received and any subsequent clarification.

Where a respondent corrects an error, the correction should be preserved.

Where a question remains unresolved, the record should explain that status.

This process is particularly important for a long-term reparations investigation intended to serve as a permanent reference library.

17.30. Safeguards against anti-Black racism and Institutional Racism

RNL seeks documentary evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism within consultation and representation processes.

A reparatory programme may have inclusive intentions while still requiring safeguards against unequal access, exclusion or disproportionate institutional influence.

Relevant protections may concern outreach, participant selection, meeting procedures, professional appointments, complaints and review of decisions.

The investigation should determine whether the Church Commissioners acknowledge the possibility of institutional bias affecting such processes.

It should also establish how they assess and prevent that possibility.

The existence of Black members within the Oversight Group is relevant.

However, their presence does not automatically demonstrate that every consultation or governance process is protected from racial bias.

RNL makes no allegation that anti-Black racism or Institutional Racism has occurred in the Project Spire consultation process.

It asks for evidence of the safeguards relied upon.

17.31. Institutional independence and the possibility of unequal power

Consultation may take place between parties possessing very different resources and institutional authority.

The Church Commissioners possess substantial financial, legal and administrative capacity.

Many grassroots community organisations operate with limited staff, funding or professional support.

These differences may affect participation.

An organisation may need time to examine complex reports, obtain advice or consult its own members before responding.

The investigation should therefore determine whether consultation arrangements allowed reasonable opportunities for preparation and follow-up.

It should also establish whether participants were able to challenge proposals without risking exclusion from future engagement.

The aim is not to presume coercion.

It is to examine whether the consultation process recognised and addressed relevant differences in institutional power.

17.32. The possibility of tokenistic participation

A consultation process may be described as tokenistic where participation is presented as meaningful but has little genuine influence.

However, such a conclusion cannot properly be drawn merely because an institution does not adopt every recommendation.

An institution may have legitimate legal, financial or practical reasons for declining particular proposals.

The appropriate question is whether participants were informed about the scope of their influence and whether their contributions were considered.

The investigation should therefore trace significant consultation findings into the Oversight Group's recommendations and subsequent Commissioners' decisions.

Where recommendations were adopted, the evidence should be recorded.

Where they were modified or declined, the reasons should be examined.

This provides a stronger basis for assessing participation than relying upon labels alone.

17.33. Representation within an eventual Black-led fund

The proposed fund is intended to be Black-led.

The investigation must establish what that means in practice.

It should ask whether affected communities will have formal rights to appoint trustees.

It should determine whether the trustees will be accountable to identifiable constituencies or exercise independent charitable duties without a membership mandate.

It should also examine whether different geographical communities will possess mechanisms for participation.

These are matters requiring careful institutional design.

There may be legitimate reasons for trustees to exercise independent judgment.

However, the programme should not use the language of community representation where no representative appointment or accountability mechanism exists.

Precise descriptions will assist public confidence.

17.34. The relationship between identity and representation

An individual's identity may be relevant to the experience and expertise they bring to a reparations programme.

However, identity does not automatically confer institutional membership or authority to represent others.

A person may be Black without having been authorised to speak for particular Black communities.

An organisation may be Black-led without being representative of every person of African descent.

A trustee may possess legal authority over a charity without being an elected community representative.

These differences must be maintained.

RNL's examination will focus upon appointment, mandate, accountability and decision-making powers.

The objective is not to challenge anyone's identity.

It is to establish the authority attached to public claims of representation.

17.35. The right to remain independent

Independent grassroots reparations organisations should be able to contribute information, ask questions and express disagreement without automatically surrendering their organisational independence.

Participation in consultation should not be presented as endorsement of the Commissioners' programme unless the organisation expressly agrees.

Similarly, receipt of information should not be confused with acceptance of the proposed fund's governance arrangements.

The investigation should establish whether the Commissioners recognise these distinctions.

It should also determine whether participation in future grant-making will require organisations to accept conditions unrelated to the legitimate purposes of the funding.

No such inappropriate condition is presently established.

The question concerns the design of accessible and accountable participation.

17.36. Consultation and the possibility of future disputes

Reparatory justice involves deeply held historical grievances and potentially substantial financial resources.

Disagreements may arise concerning the identities of affected communities, the selection of representatives, the form of financial benefits and the interpretation of historical responsibility.

These disagreements should be anticipated as normal possibilities requiring fair procedures.

They should not automatically be treated as threats.

The investigation should examine whether Project Spire has established mechanisms for recording concerns, providing explanations and addressing disputes before they become entrenched.

Such arrangements can reduce unnecessary misunderstanding.

They may also support constructive engagement among organisations with different priorities.

17.37. Preventing violence and threats of violence

RNL maintains that transparency, professional organisation and effective communication are essential foundations for peace.

The possibility that serious unresolved grievances could escalate into intimidation, threats of violence or physical violence should be considered within preventative institutional planning.

This concern must be approached carefully.

It does not mean that Black/Afrikan communities expressing disagreement are inherently dangerous.

It does not imply that participants in Project Spire's consultation have threatened violence.

Nor does it establish that violence is imminent.

The purpose is to promote lawful, peaceful and effective mechanisms for resolving disputes over representation, resources and institutional responsibility.

Preventative safeguards should protect everyone involved while preserving legitimate criticism and the right to challenge decisions.

17.38. Required evidence concerning the original consultation

The investigation should obtain the complete Oversight Group questionnaire analysis and any available methodology.

It should examine participant recruitment, geographical distribution, response rates and the wording of questions.

It should also seek information concerning facilitated events, including locations, dates, attendance and the principal themes recorded.

The original terms of reference should be used to establish the consultation's intended scope.

The investigation should distinguish qualitative evidence from quantitative survey findings.

It should also establish whether the reported figure of 1,106 represents unique individual participants or combined participation entries across engagement routes.

That detail should be confirmed before presenting the figure as a count of unique people.

These records will permit a more rigorous assessment of the consultation's coverage and limitations.

17.39. Required evidence concerning subsequent engagement

The original consultation occurred primarily in 2023.

The proposed fund remains under development as at 18 October 2026.

The investigation must therefore establish what engagement occurred during 2024, 2025 and 2026.

It should identify whether the Commissioners maintained a continuing consultation programme.

It should also determine whether participants received updates concerning the implementation of recommendations.

Where new governance proposals were developed, the investigation should establish whether affected communities were invited to examine them.

The continuing nature of the programme makes this question important.

A consultation conducted in 2023 cannot automatically be assumed to provide sufficient engagement for every decision made several years later.

17.40. Priority questions concerning the original consultation

Question 17.1: What were the original terms of reference for the consultation programme undertaken in 2023?

Question 17.2: Who approved the consultation methodology?

Question 17.3: How were participants and organisations identified?

Question 17.4: What methods were used to publicise the global questionnaire?

Question 17.5: Does the reported total of 1,106 represent unique participants or combined participation records?

Question 17.6: How many participants attended each facilitated event?

Question 17.7: What were the dates and locations of all facilitated events?

Question 17.8: Which countries and regions were represented?

Question 17.9: What language and accessibility arrangements were provided?

Question 17.10: Were methodological limitations formally identified and published?

17.41. Priority questions concerning grassroots organisations

Question 17.11: What criteria were used to identify longstanding Black/Afrikan reparations organisations?

Question 17.12: Which organisations were directly invited to participate?

Question 17.13: Could organisations register their interest independently?

Question 17.14: Were organisations outside established Church or academic networks approached?

Question 17.15: Were independent grassroots organisations in Britain, Africa and the Caribbean able to participate?

Question 17.16: Were relevant national reparations commissions or community organisations consulted?

Question 17.17: How did the Commissioners assess whether significant groups had been overlooked?

Question 17.18: What opportunities exist for organisations that did not participate in 2023 to contribute now?

Question 17.19: Can organisations challenge inaccurate descriptions of their participation or endorsement?

Question 17.20: Will an appropriate anonymised or institutional consultation register be made publicly available?

17.42. Priority questions concerning representation and consent

Question 17.21: How did the consultation distinguish participants' opinions from organisational positions?

Question 17.22: Were respondents asked whether they authorised any person or institution to represent them?

Question 17.23: What definition of community representation was adopted?

Question 17.24: How were competing views recorded?

Question 17.25: Were disagreements concerning direct compensation and investment addressed?

Question 17.26: Did the Commissioners treat participation as endorsement of the proposed programme?

Question 17.27: What procedures prevent consultation from being misrepresented as consent?

Question 17.28: How will future community representatives be selected?

Question 17.29: What accountability mechanisms will apply to representatives?

Question 17.30: How will the fund distinguish community representation from trustee authority?

17.43. Priority questions concerning influence on decisions

Question 17.31: Which consultation findings directly influenced the Oversight Group's recommendations?

Question 17.32: Which recommendations were accepted by the Church Commissioners?

Question 17.33: Which have been implemented?

Question 17.34: Which remain outstanding?

Question 17.35: Were any substantial consultation priorities rejected or modified?

Question 17.36: What reasons were recorded for such decisions?

Question 17.37: How have affected communities participated in developing the new fund's proposed governing document?

Question 17.38: What involvement have they had in investment policy?

Question 17.39: What involvement have they had in grant-making criteria?

Question 17.40: How will community feedback influence decisions after the fund becomes operational?

17.44. Priority questions concerning accessibility and independent participation

Question 17.41: What arrangements exist for participants without reliable internet access?

Question 17.42: What translated materials are available?

Question 17.43: What disability-access arrangements apply?

Question 17.44: What procedures allow smaller organisations adequate time to review complex proposals?

Question 17.45: Can organisations submit detailed written representations without attending meetings?

Question 17.46: Can participants ask questions without accepting the Commissioners' preferred model of reparatory justice?

Question 17.47: Will organisations be able to remain independent while participating?

Question 17.48: Can participants request corrections to the consultation record?

Question 17.49: How are concerns about institutional pressure or unequal access addressed?

Question 17.50: What additional participation opportunities are planned before final fund operations commence?

17.45. Priority questions concerning safeguards and complaints

Question 17.51: What safeguards exist against the possibility of anti-Black racism and Institutional Racism in consultation?

Question 17.52: Have equality-impact or comparable participation-risk assessments been undertaken?

Question 17.53: What procedures address perceived exclusion?

Question 17.54: Can participants obtain written explanations of decisions affecting their involvement?

Question 17.55: What independent complaints procedures are available?

Question 17.56: How are conflicts of interest involving consultation organisers identified and managed?

Question 17.57: What safeguards prevent consultation networks from becoming exclusive channels for future funding?

Question 17.58: What procedures permit organisations to challenge claims of community endorsement?

Question 17.59: What measures address serious grievances and prevent avoidable escalation?

Question 17.60: Will the Commissioners publish a comprehensive consultation and representation accountability report covering 2023 through October 2026?

17.46. Preliminary evidential findings

The Church Commissioners publicly report that 1,106 people participated through engagement events and a global survey during the development of Project Spire's proposed reparatory response.

The Oversight Group's report identifies engagement activities in England, Jamaica, Barbados and Ghana.

It also provides geographical information concerning questionnaire respondents, with a majority based in Europe, predominantly the United Kingdom.

The consultation identified substantive concerns about historical responsibility, financial inequality, cultural identity, health, education, land and economic empowerment.

The Oversight Group used the process to inform recommendations concerning investment, grant-making, Black leadership, transparency and continuing community engagement.

The Commissioners accepted the Group's recommendations and have publicly recognised the need for ongoing engagement.

These are documented developments.

However, the records examined do not establish that every relevant grassroots reparations organisation was consulted.

They do not establish that all participants endorsed the final proposals.

They do not establish that questionnaire respondents collectively possessed authority to represent the global African diaspora.

Nor do they establish that the eventual fund has transferred decision-making control to affected communities.

The completeness and subsequent influence of consultation remain matters for further documentary examination.

17.47. Conclusion: consultation must be measured by participation, influence and accountability

Project Spire's original consultation programme has a documented foundation.

The Commissioners undertook engagement activities, obtained questionnaire responses and established a Black-led Oversight Group whose recommendations reflected themes raised by affected communities.

These steps are significant and must be recognised.

However, the existence of consultation does not automatically establish adequate representation or community consent.

A large participation figure does not identify every organisation that took part.

An advisory recommendation does not establish that participants control subsequent decisions.

A published statement welcoming community views does not, by itself, demonstrate that every relevant concern has been addressed.

RNL must therefore examine the consultation's accessibility, scope, methodology, influence and continuing operation.

It must also establish whether longstanding independent Black/Afrikan reparations organisations can contribute without surrendering their independence or being required to endorse decisions they did not authorise.

Safeguards against possible anti-Black racism and Institutional Racism must be documented rather than presumed.

The process should permit disagreement, correction, complaints and independent scrutiny.

The central conclusion of Section 17 is that Project Spire undertook a substantial documented consultation exercise, but the evidence reviewed does not establish universal community representation, consent or final decision-making authority. The quality and continuing legitimacy of consultation must be tested through its accessibility, representativeness, influence on decisions and accountability to affected communities.

RNL will continue to pursue these questions independently, rigorously and professionally.

The objective is a reparatory process in which affected people are genuinely heard, institutional authority is accurately described, participation is meaningful, and disagreements are addressed through transparent and peaceful procedures.

SECTION 17 — CONSULTATION AND REPRESENTATION EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-17-001	2023 consultation and engagement programme	Official institutional record
SPIRE-17-002	Reported participation of 1,106 people through combined engagement routes	Commissioners' published figure

SPIRE-17-003	Engagement activities in England, Jamaica, Barbados and Ghana	Oversight Group report
SPIRE-17-004	Five facilitated events in England during October 2023	Oversight Group report
SPIRE-17-005	Dedicated engagement panel for younger stakeholders	Oversight Group report
SPIRE-17-006	Questionnaire geographical distribution	Published research findings
SPIRE-17-007	Substantive concerns about health, education, economic empowerment and cultural repair	Oversight Group report
SPIRE-17-008	Recommendations for ongoing community engagement	Published advisory recommendations
SPIRE-17-009	Board acceptance of Oversight Group recommendations	Official institutional record
SPIRE-17-010	Complete list of grassroots organisations invited	Verification outstanding
SPIRE-17-011	Unique-participant reconciliation of the 1,106 figure	Clarification required
SPIRE-17-012	Representativeness of consultation	Independent methodological assessment outstanding
SPIRE-17-013	General community consent to programme design	Not established
SPIRE-17-014	Community control over final governance and financial decisions	Not established
SPIRE-17-015	Complete continuing-engagement record for 2024–26	Further evidence required
SPIRE-17-016	Accessibility and anti-racism safeguards	Documentary examination outstanding
SPIRE-17-017	Independent complaints and review arrangements	Further verification required

SPIRE-17-018	Right of grassroots organisations to challenge and correct representations	Specific procedures to be established

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SOURCES AND INDEPENDENT VERIFICATION

Source 17.1 — Church Commissioners: Frequently Asked Questions

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Evidence: Reported 1,106 participants, consultation methods, geographical engagement and institutional explanation.

Source 17.2 — Oversight Group report, March 2024

Recommendations to the Church Commissioners' Board of Governors.

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Evidence: Consultation methodology, geographical distribution, participant concerns, Black leadership and continuing-engagement recommendations.

Source 17.3 — Church Commissioners: Related Documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Evidence: Oversight Group terms of reference, questionnaire analysis and original recommendations.

Source 17.4 — Church Commissioners, 4 March 2024

Church Commissioners warmly welcomes Oversight Group's report.

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

Evidence: Board acceptance of recommendations and acknowledgement of consultation with impacted communities.

Source 17.5 — Church Commissioners, 26 March 2025

From Commitment to Action: Our Continuing Journey.

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

Evidence: Continuing workstreams and development of governance, investment and grant-making arrangements.

Source 17.6 — Church Commissioners: Tell us what you think

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Current feedback mechanism, stated response aim and confirmation that the fund is not yet operational.

Source 17.7 — Fund for Healing, Repair and Justice

https://hrjfund.org/

Evidence: Public statement concerning continuing work on governance, structure and delivery arrangements.

Source 17.8 — Empress Judah correspondence, 18 October 2026

Original emails circulated concerning the Global Reparations Hub launch and related enquiries.

Evidence: Attributed concerns about grassroots consultation and the separate request to examine Project Spire.

Status: Private correspondence held in the RNL investigation record. Its relevance to Project Spire must not be overstated.

END OF SECTION 17 — COMMUNITY CONSULTATION AND REPRESENTATION: WHO WAS CONSULTED, WHO WAS NOT, BLACK/AFRIKAN GRASSROOTS PARTICIPATION, COMMUNITY CONSENT, ACCESSIBILITY AND THE RIGHT TO CHALLENGE

NEXT: SECTION 18 OF 24 — SAFEGUARDS AGAINST ANTI-BLACK RACISM AND INSTITUTIONAL RACISM: RECOGNITION OF RISK, EQUALITY PROTECTIONS, INDEPENDENT SCRUTINY, COMPLAINTS, ACCOUNTABILITY AND THE RIGHT TO A FAIR DECISION.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 18 OF 24

SAFEGUARDS AGAINST ANTI-BLACK RACISM AND INSTITUTIONAL RACISM: RECOGNITION OF RISK, EQUALITY PROTECTIONS, INDEPENDENT SCRUTINY, COMPLAINTS, ACCOUNTABILITY AND THE RIGHT TO A FAIR DECISION

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Church-wide racial-justice commitments and statutory protections identified. The existence, scope, application and demonstrated effectiveness of safeguards specifically governing Project Spire and the proposed Fund for Healing, Repair and Justice require further documentary examination.

18.1. Purpose of this section

This section examines whether Project Spire and the proposed Fund for Healing, Repair and Justice possess adequate safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism within their governance, administration, consultation and financial decision-making arrangements.

This enquiry is central to the legitimacy of a programme intended to address historical harm arising from African chattel enslavement.

Reparation Nation Limited considers that an institution responding to historical racial injustice should be capable of identifying the safeguards that protect its contemporary decisions from racial discrimination, unequal treatment and inappropriate institutional influence.

The investigation does not begin by assuming that anti-Black racism has occurred.

It begins by asking whether the institutions responsible recognise the **possibility** that it could occur, whether they have established effective protections, and whether those protections can be independently examined.

The distinction is essential.

Evidence of a policy does not automatically establish that the policy operates effectively.

The appointment of Black individuals does not automatically eliminate the possibility of Institutional Racism.

A commitment to racial justice does not necessarily demonstrate that every financial or administrative process has been protected against racial bias.

Equally, the absence of an immediately available policy document is not proof that discrimination has occurred.

RNL's responsibility is to identify what safeguards are documented, what remains unverified, how decisions can be challenged and whether affected people have access to fair and effective remedies.

18.2. RNL's stated investigative position

RNL conducts this enquiry from the position that anti-Black racism and Institutional Racism are serious matters requiring preventative safeguards.

The position should not be diluted into a general enquiry about whether there is already proof of discriminatory wrongdoing.

The critical question concerns **exposure to the possibility of racial discrimination where the existence or effectiveness of safeguards has not been demonstrated**.

RNL's statement is:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

For the avoidance of misunderstanding:

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

These statements are compatible.

The first identifies an absence of evidence supplied to the investigator and a concern requiring clarification.

The second expressly preserves an open evidential position.

An institution may respond by supplying documentary evidence of its safeguards.

Such evidence should then be examined fairly.

The absence of evidence provided to RNL must not be misrepresented as proof that no safeguards exist anywhere within the institution.

18.3. The significance of Institutional Racism

Institutional Racism concerns the possibility that an organisation's structures, policies, practices or decision-making processes may produce discriminatory treatment or disadvantages.

Such outcomes need not depend upon a decision-maker openly expressing racist beliefs.

A procedure may appear neutral while creating unequal access.

Recruitment arrangements may favour established professional networks.

Consultation procedures may repeatedly overlook particular communities.

Funding requirements may create barriers for organisations possessing fewer institutional resources.

Complaints procedures may be inaccessible or insufficiently independent.

These examples describe possible institutional risks.

They are not findings about Project Spire.

The investigation must establish whether such risks have been considered and what safeguards exist to prevent them.

The relevant evidence concerns actual policies, procedures, decision records, monitoring, complaints and remedial action.

18.4. Why a reparatory institution requires particular scrutiny

Project Spire was developed in response to historical financial connections involving the enslavement and exploitation of African people.

Its stated purpose therefore has a direct relationship with racial injustice.

This creates a particular need for institutional confidence.

If affected Black/Afrikan communities are invited to participate in consultation, apply for funding or accept institutional decisions, they should be able to understand how those decisions are protected against racial bias.

The historical purpose of the programme does not make safeguards unnecessary.

It makes their existence and effectiveness especially important to examine.

RNL therefore seeks evidence of protections applying throughout the programme's development and eventual operation.

These should cover the Church Commissioners, relevant programme personnel, the proposed fund's governing bodies, investment arrangements, grant-making procedures and complaints mechanisms.

Each institution's responsibilities must be identified separately.

18.5. The Church of England's established racial-justice framework

The Church of England has publicly acknowledged racial-justice concerns within its institutional structures.

Its Archbishops' Anti-Racism Taskforce developed recommendations published in *From Lament to Action* in 2021.

The Church subsequently established the Archbishops' Commission for Racial Justice to examine progress and support accountability.

The Commission was chaired by Lord Paul Boateng and issued a series of reports between 2022 and 2025.

These records demonstrate that racial injustice has been recognised as a significant institutional issue.

They provide relevant background to Project Spire.

However, the existence of a Church-wide racial-justice framework does not establish that Project Spire has adopted every relevant recommendation or implemented project-specific safeguards.

The investigation must therefore examine how Church-wide commitments are translated into the governance and operation of the proposed fund.

Primary source:

Church of England — Racial Justice:

https://www.churchofengland.org/about/racial-justice

18.6. From Lament to Action

The Archbishops' Anti-Racism Taskforce published *From Lament to Action* in 2021.

Its recommendations concerned structural and cultural change within the Church of England.

The subsequent Archbishops' Commission for Racial Justice was tasked with monitoring implementation of the recommendations.

This is significant because it establishes that institutional racial-justice reform was not merely an incidental subject within the Church.

It had been developed into a formal programme with recommendations and external scrutiny.

However, this wider reform programme should not be confused with Project Spire.

The two initiatives have different origins, objectives and governance arrangements.

The investigation must establish whether Project Spire formally adopted relevant safeguards from the Church-wide programme.

Where it did, the relevant implementation records should be obtained.

Where it did not, the institution should explain what alternative protections apply.

18.7. The Archbishops' Commission for Racial Justice

The Archbishops' Commission for Racial Justice was charged with examining the Church's progress towards addressing systemic racism.

It issued six biannual reports and published additional research concerning experiences within the Church.

Its work provides a substantial body of institutional evidence and recommendations.

This is relevant to RNL's investigation because the Commission's existence demonstrates that the possibility of systemic racism within Church structures was already being treated as a serious matter.

However, the Commission's original mandate, its reporting arrangements and its conclusion in 2025 must be distinguished from the ongoing governance of Project Spire.

The investigation should establish whether the Commission exercised any formal oversight of Project Spire and whether relevant findings were incorporated into programme procedures.

A general commitment to implementing racial-justice recommendations does not automatically establish an independent complaints mechanism for Project Spire beneficiaries.

Primary source:

Church of England — Archbishops' Commission for Racial Justice reports:

https://www.churchofengland.org/about/archbishops-commissions/racial-justice/reports

18.8. The Commission's direct reference to Project Spire

The Church of England's announcement concerning the Commission's third biannual report, published in September 2023, specifically referred to Project Spire.

The announcement stated that Lord Boateng welcomed aspects of the Church Commissioners' work while calling for Africa, the Caribbean and their diaspora to be central to the process.

This provides an important connection between the Church's wider racial-justice work and Project Spire.

It demonstrates that Project Spire was within the scope of public comment by a body concerned with institutional racial justice.

However, the existence of that comment does not establish that the Commission reviewed the complete safeguards governing Project Spire.

Nor does it establish that all its recommendations were subsequently implemented.

The investigation should therefore examine the relevant report in full and seek documentary evidence of the Church Commissioners' response.

Primary source:

Church of England, 12 September 2023:

https://www.churchofengland.org/about/archbishops-commissions/racial-justice/news/archbishops-commission-racial-justice-releases

18.9. The Commission's final report in 2025

The Church of England published the sixth and final report of the Archbishops' Commission for Racial Justice in February 2025.

The announcement acknowledged progress while emphasising the need to sustain structural and cultural change.

This is significant to the institutional context.

It demonstrates that racial-justice reform remained an ongoing concern rather than a matter considered fully resolved.

However, the Commission's final report does not automatically certify that Project Spire is protected against anti-Black racism or Institutional Racism.

Such certification would require evidence of a project-specific review or assessment.

The investigation should establish whether any successor body, officer or independent mechanism has responsibility for monitoring Project Spire's racial-justice safeguards following the Commission's conclusion.

Primary source:

Church of England, 11 February 2025:

https://www.churchofengland.org/media/press-releases/final-report-archbishops-commission-racial-justice-published

18.10. The distinction between acknowledgement and prevention

Institutional acknowledgement of historical or contemporary racism is important.

However, acknowledgement alone does not prevent discriminatory decisions.

Prevention requires practical arrangements.

An institution may state that it opposes racial discrimination while leaving important decisions to procedures that have not been independently examined.

It may publish an equality policy without demonstrating how complaints are investigated.

It may appoint a diverse board without monitoring disparities in outcomes.

These are potential limitations that must be examined through evidence.

RNL therefore seeks both policy documents and records showing how policies operate.

An effective safeguard should be capable of being identified, explained, applied, reviewed and corrected where necessary.

The test is not simply whether the institution expresses the right principles.

It is whether those principles are operational.

18.11. The Equality Act 2010

The Equality Act 2010 provides an important legal framework governing discrimination in Britain.

Race is a protected characteristic under the Act.

The Act contains provisions addressing direct and indirect discrimination, harassment and victimisation in contexts including employment and the provision of services.

The legal application of particular provisions depends upon the nature of the institution, activity and decision concerned.

The investigation must therefore identify which statutory duties apply to the Church Commissioners, programme personnel, the proposed fund and relevant service providers.

It must not automatically presume that every organisation is subject to every duty contained in the Act.

At the same time, the existence of charitable status does not generally place an institution beyond equality law.

The precise statutory obligations should be identified and explained.

Primary legislation:

Equality Act 2010:

https://www.legislation.gov.uk/ukpga/2010/15/contents

18.12. Equality protections in charitable grant-making

The Charity Commission has published guidance explaining how the Equality Act 2010 applies to charities.

The guidance identifies grant-making as a form of service provision for relevant purposes.

It also explains that charities may, in certain circumstances, lawfully restrict benefits to people sharing particular protected characteristics, subject to the applicable statutory conditions.

This distinction is directly relevant to Project Spire.

A reparatory fund may wish to prioritise Black communities affected by historical enslavement.

Such an objective should be assessed through the relevant charitable and equality-law provisions rather than automatically described as unlawful racial discrimination.

However, the existence of a potentially lawful targeted-benefit framework does not remove the requirement to administer decisions fairly.

The investigation should establish the legal basis for beneficiary eligibility and how it will be implemented.

It should also examine the treatment of applicants within the intended beneficiary groups.

Primary source:

Charity Commission — Equality Act guidance for charities:

https://www.gov.uk/government/publications/equality-act-guidance-for-charities/equality-act-guidance-for-charities

18.13. The Public Sector Equality Duty

Section 149 of the Equality Act 2010 establishes the Public Sector Equality Duty.

It requires specified public authorities, and other organisations when exercising qualifying public functions, to have due regard to the statutory equality objectives.

These include eliminating prohibited discrimination, advancing equality of opportunity and fostering good relations.

However, the duty does not automatically apply to every activity undertaken by every charity.

Its application depends upon the legal identity and functions concerned.

RNL must therefore ask whether any Project Spire decisions are subject to the Public Sector Equality Duty and, if so, on what basis.

Where the duty does not apply, the investigation should identify what alternative statutory or institutional safeguards are relevant.

It would be incorrect to claim that a particular Project Spire decision breached section 149 without first establishing that the duty applies to that decision.

18.14. The distinction between legal compliance and effective safeguards

Compliance with applicable equality law is a minimum legal requirement.

However, an institution may choose to implement additional safeguards appropriate to its particular responsibilities.

For Project Spire, those responsibilities concern historical racial injustice and a proposed reparatory fund.

Relevant additional safeguards may include independent scrutiny, transparent decision criteria, community review, publication of anonymised outcomes and accessible complaints arrangements.

The investigation should determine which protections the Commissioners have adopted beyond minimum legal requirements.

Where the institution relies exclusively upon general statutory provisions, that position should be recorded.

The question of adequacy should then be assessed according to the programme's particular risks.

This enquiry concerns the practical credibility of the reparatory process.

18.15. Safeguards in trustee appointments

The proposed Fund for Healing, Repair and Justice may eventually possess a separate trustee board.

The appointment process will be central to governance.

The investigation should examine whether criteria are published, how candidates are identified, who makes appointments and what opportunities exist for independent scrutiny.

It should also establish how the programme addresses possible racial bias in recruitment and selection.

The appointment of Black trustees may contribute to the intended leadership structure.

However, their appointment does not automatically establish that all affected communities are represented or that every governance process is protected against discrimination.

RNL should therefore examine both composition and procedure.

The relevant safeguards must apply to actual decisions.

18.16. Safeguards in professional employment and commissioning

Project Spire has engaged professional researchers, advisers and staff.

The investigation should establish which employment and procurement policies apply to those appointments.

Relevant questions concern open recruitment, selection criteria, conflicts of interest, accessibility and complaints.

Where services are commissioned through contracts, the responsible institution should identify the applicable procedures.

The existence of a professional appointment does not establish that the appointment was improper.

Nor should personal identity or institutional association be treated as evidence of misconduct.

The purpose is to determine whether decisions are made through transparent and fair processes.

This is particularly relevant where professional roles may influence consultation, research findings or subsequent financial decisions.

18.17. Safeguards in historical research

Historical research can influence how responsibility and reparatory objectives are defined.

The investigation should therefore examine whether research methodologies include appropriate procedures for identifying and correcting bias.

Relevant safeguards may involve independent scholarly review, source transparency, preservation of uncertainty and opportunities for affected communities to submit evidence.

The Church Commissioners' research relied upon forensic accounting and historical expertise.

That is important evidence of a professional research process.

However, it does not automatically establish that every relevant African historical perspective or community source was incorporated.

The investigation should identify the research's scope and limitations.

It should also determine whether the programme provides a mechanism for correcting material errors or addressing contested interpretations.

18.18. Safeguards in consultation

Section 17 examined the Commissioners' reported consultation involving 1,106 participants across engagement activities and a global questionnaire.

The existence of that consultation is documented.

However, the present section asks whether the consultation process contained safeguards against unequal access or exclusion.

Relevant questions include how participants were selected, whether information was accessible and whether minority or dissenting views were preserved.

The investigation should also examine whether organisations could participate without endorsing institutional positions.

A consultation process should not automatically treat criticism as obstruction.

Nor should participation be misrepresented as universal consent.

The relevant safeguards concern fairness, accessibility and accurate representation of responses.

18.19. Safeguards in beneficiary eligibility

The proposed fund is intended to benefit communities affected by the legacies of African chattel enslavement.

However, the final eligibility rules remain to be established.

These rules could materially influence which individuals, businesses and organisations receive benefits.

The investigation should therefore examine how eligibility will be defined and justified.

It should also identify how decisions may be challenged.

A criterion may be relevant to the legitimate objectives of the fund while still requiring safeguards against inconsistent or arbitrary application.

The institution should be able to explain how eligibility relates to the historical harm and intended reparatory purpose.

Where distinctions are made between groups, those distinctions should have a documented legal and policy basis.

18.20. Safeguards in financial decision-making

Investment and grant-making decisions may involve substantial financial discretion.

The investigation should establish what safeguards will protect those decisions.

Relevant measures may include written criteria, independent assessment, conflict-of-interest declarations, approval limits and audit requirements.

It should also examine whether unsuccessful applicants receive reasons and whether decisions can be reviewed.

An institution may possess robust accounting procedures while still requiring separate scrutiny of fairness in beneficiary selection.

Financial accuracy and equality are related but distinct matters.

The programme should therefore demonstrate both lawful financial administration and fair decision-making.

The existence of a Black-led governance aspiration does not remove the need for those safeguards.

18.21. Indirect disadvantage and administrative barriers

A decision-making process may create barriers without expressly referring to race.

For example, a fund may require applicants to possess substantial administrative capacity, professional advisers, detailed audited accounts or particular institutional relationships.

Some requirements may be necessary to protect charitable funds.

However, they may affect smaller grassroots organisations differently from established institutions.

The investigation should therefore examine whether requirements are proportionate to the funding involved.

It should also establish whether alternative procedures or support are available where appropriate.

This is an enquiry into possible unequal effects, not an allegation that Project Spire has adopted discriminatory criteria.

The final application rules must be examined before conclusions can be reached.

18.22. The role of independent scrutiny

An institution's internal assurance procedures may be valuable.

However, independent scrutiny provides an additional safeguard where decisions involve historical racial injustice and substantial financial resources.

The investigation should identify whether Project Spire has established an independent equality or racial-justice review mechanism.

It should also determine whether such a mechanism can examine complaints concerning trustees, officers or programme decisions.

The Archbishops' Commission for Racial Justice previously provided Church-wide external scrutiny.

However, its work should not automatically be treated as an ongoing Project Spire complaints service.

The investigation must identify any current mechanism specifically authorised to examine concerns arising from the proposed fund.

18.23. The importance of real independence

A body described as independent may nevertheless possess institutional relationships affecting its authority.

For example, an advisory committee may be appointed by the same institution whose decisions it reviews.

That arrangement does not automatically make the committee ineffective.

However, the investigation should establish its actual powers.

Can it obtain relevant records?

Can it require explanations?

Can it recommend corrective action?

Can it publish findings?

Can the institution disregard those findings without explanation?

These are practical questions about independence.

A complaints or review body should be evaluated through its governing powers and procedures rather than its title alone.

18.24. The right to complain

The ability to submit a complaint is a fundamental accountability requirement.

The investigation should establish how a person or organisation may raise concerns concerning racial discrimination, exclusion, unfair treatment or inappropriate conduct.

A complaint procedure should identify where the complaint must be sent, who considers it, how conflicts are managed and what response may be expected.

It should also explain whether the complainant can request a review.

For Project Spire, the mechanism must distinguish complaints concerning the Church Commissioners from those concerning any future separate fund.

An individual should not be required to guess which organisation possesses authority to investigate a particular decision.

Accessible responsibility is essential to accountability.

18.25. The right to a fair decision

Fair decision-making concerns more than whether the final outcome is favourable to an applicant.

A fair process should involve relevant criteria, appropriate consideration, freedom from prohibited discrimination and a record capable of supporting review.

An applicant may be unsuccessful even where the process is fair.

However, an applicant should be able to understand the basis of the decision to the extent appropriate under the applicable rules.

The investigation should therefore examine whether Project Spire will provide written reasons for material grant or eligibility decisions.

It should also establish whether decision-makers are trained to recognise relevant risks of racial bias.

The objective is to protect procedural fairness without guaranteeing particular outcomes.

18.26. The right to challenge

An effective complaints system should provide a route for challenging decisions that may have been affected by error, bias or procedural irregularity.

The investigation should identify whether Project Spire proposes an internal appeal, independent review or another appropriate mechanism.

It should also establish whether the procedure has reasonable deadlines and accessible evidence requirements.

Where legal remedies are available, the institution should provide accurate information rather than misleading applicants about their rights.

RNL does not presume that every disagreement constitutes discrimination.

The right to challenge is important precisely because it allows concerns to be assessed rather than presumed.

A programme claiming reparatory objectives should not treat reasonable scrutiny as inherently hostile.

18.27. Protection against victimisation

People may be reluctant to complain if they believe that doing so could affect their future opportunities.

The Equality Act 2010 contains protections against victimisation in relevant circumstances.

However, statutory protection must be distinguished from additional institutional guarantees.

The investigation should examine whether Project Spire permits applicants, participants and community organisations to raise concerns without improper retaliation.

It should establish whether complaints are handled confidentially where appropriate and whether individuals are protected from conflicts of interest.

No instance of victimisation has been established in this investigation.

The question concerns the safeguards intended to prevent it.

18.28. The independence of grassroots organisations

Independent Black/Afrikan grassroots reparations organisations should be able to participate in Project Spire discussions without automatically surrendering their own positions.

A community organisation may agree with the historical research while questioning the proposed financial model.

It may support reparatory justice while disagreeing with eligibility criteria or governance arrangements.

The investigation should establish whether participation, consultation or future funding agreements impose restrictions affecting lawful criticism.

Such restrictions should not be assumed to exist.

However, the issue is relevant because institutional funding can create differences in bargaining power.

The programme should provide a clear explanation of any legitimate conditions attached to grants or contracts.

Those conditions should be distinguished from attempts to control independent community opinion.

18.29. Transparency concerning conflicts of interest

Potential conflicts of interest can affect institutional confidence.

The previous sections identified documented professional overlaps involving persons associated with Project Spire-related research and the Global Reparations Hub.

Such overlaps are legitimate subjects for clarification.

However, they do not automatically establish wrongdoing.

The investigation should determine which policies apply where personnel possess responsibilities or affiliations with external reparations organisations.

It should examine whether relevant interests must be declared and whether particular decisions require recusal.

The purpose is to establish whether suitable safeguards exist.

The investigation should not infer improper influence solely from the existence of multiple professional relationships.

18.30. Safeguards where the same individual holds multiple roles

A person may properly work for one institution while participating independently in another initiative.

Nevertheless, the boundaries of those roles should be understood.

For example, the investigation may need to establish whether an individual acted in a Church Commissioners capacity, a personal capacity or on behalf of a separate organisation.

That distinction affects responsibility for statements, documents and decisions.

It may also affect whether confidentiality or conflict-of-interest requirements apply.

RNL should seek institutional clarification rather than infer authority from public appearances.

The objective is to identify actual responsibilities and prevent confusion.

This approach protects both the individuals concerned and the integrity of the investigation.

18.31. The relationship between Church-wide racial justice and Project Spire

The Church of England's racial-justice framework provides relevant institutional context.

The Commissioners' response to historical enslavement also engages issues of racial justice.

However, the two programmes must not be merged without evidence.

The investigation should ask whether Project Spire has a formal relationship with the Church's racial-justice structures.

It should establish whether relevant recommendations have been incorporated into its policies.

It should also identify who is responsible for verifying compliance.

A Church-wide document may apply generally while additional programme-specific procedures are required.

The investigation therefore seeks a clear account of how the wider framework affects the actual decisions of Project Spire.

18.32. Equality and safeguarding are not interchangeable

The term *safeguarding* is sometimes used within Church contexts to describe protection against abuse or harm.

RNL's present enquiry has a specific focus upon anti-Black racism and Institutional Racism.

A general safeguarding policy may not fully address racial discrimination in financial or administrative decisions.

Likewise, a general equality policy may not address every concern concerning intimidation, harassment or personal safety.

The investigation should therefore identify the distinct protections available.

It should avoid accepting the existence of an unrelated policy as a complete answer to a specific question about racial bias.

The responsible institution should explain which policy applies to which risk.

18.33. The need for evidence of implementation

The institution may provide a policy stating that discrimination is prohibited.

That would be relevant evidence.

However, RNL also seeks evidence showing how the policy is applied.

Such evidence might include staff training, monitoring reports, independent reviews, anonymised complaints data and records of corrective action.

The investigation must not demand disclosure of confidential personal information unnecessarily.

Appropriate aggregate or redacted information may be sufficient to demonstrate that procedures operate.

Where no such information is published, the institution should explain how effectiveness is assessed.

The distinction between **policy existence** and **demonstrated operation** is fundamental.

18.34. Evidence of effectiveness

A safeguard should be evaluated according to its purpose.

For example, a complaints procedure may be assessed by whether complaints can be submitted, considered impartially and resolved within a reasonable period.

An equality-monitoring procedure may be assessed by whether it identifies relevant patterns and produces corrective action.

A conflict-of-interest policy may be assessed by whether interests are declared and managed before decisions are made.

The investigation should therefore seek measurable indicators of effectiveness.

However, the absence of recorded complaints is not automatically proof that no problems exist.

It may reflect effective safeguards, limited activity, low awareness or other circumstances.

The evidence must be interpreted carefully.

18.35. The importance of written responses

RNL seeks written answers concerning safeguards.

Written responses permit precise examination of the institution's position.

They can identify named policies, statutory duties, responsible officers and procedures.

They also provide a record against which future actions may be assessed.

An informal assurance that an institution is committed to racial justice may be sincere.

However, it does not provide the same evidential detail as a policy, governing document or formal explanation.

The investigation should therefore request complete written responses with links to relevant sources.

Where documents are unavailable, the institution should explain the position.

18.36. The possibility of procedural unfairness

A decision may be procedurally unfair without establishing racial discrimination.

For example, an applicant might receive inconsistent information, an unexplained delay or an incomplete response.

Such problems may warrant correction even where no discriminatory cause can be demonstrated.

The investigation must preserve this distinction.

Not every administrative problem should be labelled racism.

However, the existence of a possible non-racial explanation does not eliminate the need to examine whether racial bias could have influenced the decision.

A fair process should be capable of assessing both possibilities.

RNL's position is to ask whether effective safeguards exist, not to announce conclusions before obtaining evidence.

18.37. Public accountability and corrections

A reparatory institution should have a procedure for correcting inaccurate public statements.

This may include errors concerning eligibility, governance, consultation, financial commitments or the role of individuals.

The investigation should establish whether Project Spire maintains an accessible corrections process.

It should also determine whether corrections are dated and linked to the original statement.

An error should not be concealed merely because it may cause embarrassment.

Equally, an error should not automatically be treated as evidence of deliberate deception.

A transparent corrections process supports accuracy and confidence.

It is an important component of institutional accountability.

18.38. The possibility of violence and threats of violence

RNL maintains that transparency, professional organisation and effective safeguards are essential foundations for peace.

Reparatory justice concerns historical suffering, institutional responsibility and potentially substantial financial resources.

Serious unresolved disputes may create opportunities for misunderstanding, intimidation or threats of violence.

The possibility should therefore be considered in preventative planning.

However, the investigation does not assert that violence is inevitable.

It does not attribute violent intentions to Black/Afrikan communities.

It does not claim that Project Spire personnel have threatened violence.

The objective is to support lawful and peaceful processes for addressing concerns.

Preventative arrangements should protect legitimate criticism while identifying and responding appropriately to actual threats where they occur.

18.39. Institutional accountability as a preventative safeguard

A clear complaint route can reduce frustration by allowing concerns to be examined.

Published decision criteria can reduce uncertainty.

Independent review can provide confidence that complaints will not be decided solely by persons whose conduct is being challenged.

Accessible communication can help correct misunderstanding before it spreads.

These measures do not guarantee that disagreements will disappear.

However, they provide lawful mechanisms for managing them.

RNL considers them particularly important in reparations initiatives because the historical and emotional significance of the subject is substantial.

The investigation should establish whether Project Spire has planned suitable arrangements before the fund becomes operational.

18.40. Priority questions concerning recognition of risk

Question 18.1: Do the Church Commissioners acknowledge the possibility that anti-Black racism or Institutional Racism could affect Project Spire's contemporary decision-making processes?

Question 18.2: Have those possibilities been considered in a formal risk assessment?

Question 18.3: Who is responsible for identifying and managing racial-discrimination risks within Project Spire?

Question 18.4: What Church-wide racial-justice policies apply to the programme?

Question 18.5: What additional Project Spire-specific safeguards have been adopted?

Question 18.6: Have the relevant risks been examined by an independent body?

Question 18.7: Were affected Black/Afrikan communities consulted about the safeguards?

Question 18.8: Have any relevant risk assessments or policies been reviewed since the programme commenced?

Question 18.9: What standards are used to assess the effectiveness of the safeguards?

Question 18.10: Will the Commissioners publish a consolidated statement explaining the protections relied upon?

18.41. Priority questions concerning legal protections

Question 18.11: Which provisions of the Equality Act 2010 apply to Project Spire's current activities?

Question 18.12: Which provisions will apply to the proposed Fund for Healing, Repair and Justice?

Question 18.13: Does the Public Sector Equality Duty apply to any relevant decision, and if so, on what legal basis?

Question 18.14: What legal framework will govern targeted benefits for Black communities?

Question 18.15: How will eligibility criteria be assessed for compliance with applicable equality law?

Question 18.16: What procedures address indirect discrimination?

Question 18.17: What protections apply against harassment and victimisation?

Question 18.18: What equality-related obligations will apply to external contractors and investment managers?

Question 18.19: What training will decision-makers receive concerning relevant legal duties?

Question 18.20: What independent legal or regulatory scrutiny of equality safeguards has been undertaken?

18.42. Priority questions concerning appointments and representation

Question 18.21: What safeguards apply to appointments to Project Spire-related roles?

Question 18.22: How are trustees or prospective trustees selected?

Question 18.23: What measures protect against racial bias in recruitment and selection?

Question 18.24: How are community representatives selected and made accountable?

Question 18.25: What procedures identify and manage conflicts of interest?

Question 18.26: How are external professional roles declared?

Question 18.27: What independent review is available where an appointment is challenged?

Question 18.28: How are affected communities involved in designing appointment procedures?

Question 18.29: What evidence demonstrates fair access to relevant opportunities?

Question 18.30: Will the institution publish its appointment and conflict-management policies?

18.43. Priority questions concerning consultation and funding

Question 18.31: What safeguards prevent racial bias in consultation participant selection?

Question 18.32: How are smaller independent grassroots organisations given fair opportunities to participate?

Question 18.33: What accessibility arrangements apply?

Question 18.34: How are dissenting views recorded?

Question 18.35: What safeguards prevent consultation participation from being misrepresented as consent?

Question 18.36: What equality safeguards will govern investment decisions?

Question 18.37: What safeguards will govern grant applications?

Question 18.38: Will unsuccessful applicants receive written reasons?

Question 18.39: What independent review will be available for rejected applications?

Question 18.40: How will potential unequal outcomes be identified and corrected?

18.44. Priority questions concerning complaints and remedies

Question 18.41: What formal complaints procedure currently applies to Project Spire?

Question 18.42: Who receives complaints concerning anti-Black racism or Institutional Racism?

Question 18.43: Can complaints be submitted entirely in writing?

Question 18.44: What response times apply?

Question 18.45: Who investigates complaints?

Question 18.46: What safeguards protect the independence of the investigation?

Question 18.47: What appeal or review arrangements exist?

Question 18.48: How are complainants protected against victimisation?

Question 18.49: What corrective measures are available where a complaint is upheld?

Question 18.50: Will anonymised information concerning complaints and outcomes be published?

18.45. Priority questions concerning the Church-wide framework

Question 18.51: Which recommendations from *From Lament to Action* have been incorporated into Project Spire?

Question 18.52: Did the Archbishops' Commission for Racial Justice conduct a formal review of Project Spire?

Question 18.53: What specific findings concerning Project Spire were recorded in its reports?

Question 18.54: What response did the Church Commissioners provide to those findings?

Question 18.55: What body now holds responsibility for relevant independent racial-justice scrutiny?

Question 18.56: How are Church-wide equality policies applied to a proposed separate charitable fund?

Question 18.57: What safeguards will continue after the fund becomes operational?

Question 18.58: Will the proposed fund adopt its own anti-racism and complaints policies?

Question 18.59: How will the effectiveness of those policies be reported?

Question 18.60: What evidence will be available to affected communities seeking independent reassurance?

18.46. Priority questions concerning conflict prevention

Question 18.61: What procedures exist for addressing serious disputes over governance, representation or financial decisions?

Question 18.62: How can affected communities raise concerns without being treated as inherently hostile?

Question 18.63: What procedures distinguish legitimate criticism from actual threats?

Question 18.64: What safeguards protect participants against intimidation?

Question 18.65: What training is provided to staff handling sensitive complaints?

Question 18.66: What independent mediation or other peaceful dispute-resolution arrangements are available?

Question 18.67: How are serious incidents recorded and reviewed?

Question 18.68: What procedures protect freedom of expression and lawful community participation?

Question 18.69: How are preventative policies reviewed for possible racial bias?

Question 18.70: Will the Commissioners provide a written explanation of how transparency and complaints arrangements are intended to prevent avoidable escalation?

18.47. Preliminary findings

The Church of England has publicly acknowledged the need to address systemic racism within its structures.

It established the Archbishops' Anti-Racism Taskforce and subsequently the Archbishops' Commission for Racial Justice.

The Commission monitored implementation of the recommendations contained in *From Lament to Action*.

Its published reports provide an institutional record of racial-justice scrutiny.

The Commission's third biannual report specifically referred to Project Spire and emphasised the importance of placing Africa, the Caribbean and their diaspora at the centre of the reparatory process.

The Church of England published the Commission's final report in February 2025.

The Equality Act 2010 provides relevant protections against discrimination, subject to its application to particular persons, functions and decisions.

The Charity Commission has also published guidance concerning equality law and charitable grant-making.

These are established legal and institutional reference points.

However, the documents examined do not establish that Project Spire possesses a complete, independently tested and publicly documented set of project-specific safeguards covering every relevant stage of governance, consultation, investment, grant-making and complaints.

Nor do they establish that the proposed separate fund has finalised its own anti-racism procedures.

The extent to which Church-wide policies have been applied to Project Spire therefore remains an important matter for further examination.

18.48. Conclusion: recognition of racism is not proof of effective protection

The Church of England's published racial-justice framework is substantial and relevant.

It demonstrates institutional recognition that systemic racism requires structural and cultural change.

The Archbishops' Commission for Racial Justice also provides an important history of independent scrutiny.

However, those facts do not automatically establish that Project Spire's contemporary decisions are adequately protected against the possibility of anti-Black racism and Institutional Racism.

That question must be answered through documentary evidence.

RNL requires clarity concerning the safeguards that apply to appointments, historical research, consultation, community representation, investment, grant-making, complaints and independent review.

The investigation must also establish how these safeguards operate in practice.

The existence of a written policy is relevant.

Evidence of implementation is more substantial.

Evidence of independent testing, effective complaints and corrective action is more substantial still.

RNL has made no finding that anti-Black racism or Institutional Racism has occurred in Project Spire.

It has also not received sufficient evidence to conclude that the relevant risks are adequately controlled.

That distinction must be preserved without dilution.

The central conclusion of Section 18 is that the Church of England possesses documented racial-justice commitments and monitoring history, but the existence, application and demonstrated effectiveness of safeguards specifically protecting Project Spire and the proposed Fund for Healing, Repair and Justice remain open to independent investigation.

A reparatory institution should be capable of demonstrating not only that it recognises historical racism but also that its current decisions are subject to reliable protections against racial discrimination.

Such safeguards should be accessible, independently reviewable and capable of correction where shortcomings are identified.

RNL will continue to request written documentary evidence, preserve accurate institutional responses and pursue the investigation through lawful, peaceful and professionally accountable procedures.

SECTION 18 — RACIAL-JUSTICE SAFEGUARDS EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-18-001	Church of England Anti-Racism Taskforce	Officially documented
SPIRE-18-002	*From Lament to Action* recommendations	Published institutional framework

SPIRE-18-003	Archbishops' Commission for Racial Justice	Officially documented
SPIRE-18-004	Six biannual Commission reports	Published
SPIRE-18-005	Commission's 2023 reference to Project Spire	Published institutional record
SPIRE-18-006	Commission's final report in February 2025	Officially documented
SPIRE-18-007	Equality Act 2010	Primary legislation
SPIRE-18-008	Charity Commission equality guidance for charities	Official regulatory guidance
SPIRE-18-009	Equality Act protections relevant to charitable grant-making	Statutory and regulatory framework
SPIRE-18-010	Application of Public Sector Equality Duty to specific Project Spire functions	Requires legal clarification
SPIRE-18-011	Project Spire-specific anti-racism policy	Not yet independently established
SPIRE-18-012	Project Spire-specific Institutional Racism risk assessment	Not yet independently established
SPIRE-18-013	Project-specific independent racial-justice reviewer	Current status unverified
SPIRE-18-014	Safeguards for trustee appointments	Documentary verification required
SPIRE-18-015	Safeguards for consultation and grassroots participation	Further assessment required
SPIRE-18-016	Safeguards for investments and grant-making	Final procedures not established
SPIRE-18-017	Independent complaints and appeal arrangements	Further verification required

SPIRE-18-018	Evidence of operational effectiveness	Independent review outstanding
SPIRE-18-019	Documented instances of racial discrimination within Project Spire	No finding made
SPIRE-18-020	Preventative conflict-resolution procedures	Further verification required

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SOURCES AND INDEPENDENT VERIFICATION

Source 18.1 — Church of England: Racial Justice

https://www.churchofengland.org/about/racial-justice

Evidence: Church-wide racial-justice framework, resources and institutional commitments.

Source 18.2 — Archbishops' Commission for Racial Justice reports

https://www.churchofengland.org/about/archbishops-commissions/racial-justice/reports

Evidence: Published reports monitoring implementation of Church-wide racial-justice recommendations.

Source 18.3 — Church of England, 12 September 2023

Archbishops' Commission for Racial Justice Releases Third Biannual Report.

https://www.churchofengland.org/about/archbishops-commissions/racial-justice/news/archbishops-commission-racial-justice-releases

Evidence: Direct institutional reference to Project Spire and the importance of Africa, the Caribbean and their diaspora within the process.

Source 18.4 — Church of England, 11 February 2025

Final Report of Archbishops' Commission for Racial Justice Published.

https://www.churchofengland.org/media/press-releases/final-report-archbishops-commission-racial-justice-published

Evidence: Final Commission report and continuing need for structural change.

Source 18.5 — Equality Act 2010

https://www.legislation.gov.uk/ukpga/2010/15/contents

Evidence: Statutory protections concerning race and discrimination.

Source 18.6 — Equality Act 2010, section 29

https://www.legislation.gov.uk/ukpga/2010/15/section/29

Evidence: Relevant provisions concerning services and public functions.

Source 18.7 — Equality Act 2010, section 149

https://www.legislation.gov.uk/ukpga/2010/15/section/149

Evidence: Public Sector Equality Duty, subject to its application to the relevant institution and function.

Source 18.8 — Charity Commission equality guidance

https://www.gov.uk/government/publications/equality-act-guidance-for-charities/equality-act-guidance-for-charities

Evidence: Application of equality legislation to charities, restricted benefits and grant-making.

Source 18.9 — Government guidance on the Public Sector Equality Duty

https://www.gov.uk/government/publications/public-sector-equality-duty-guidance-for-public-authorities

Evidence: Scope and application of the duty to qualifying bodies and functions.

Source 18.10 — Church Commissioners' formal parliamentary response, January 2026

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Evidence: Institutional commitment to transparency, accountability, professional standards and lawful implementation.

Source 18.11 — Church Commissioners: Tell us what you think

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Published public enquiry mechanism and fund implementation status.

Source 18.12 — Project Spire related documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Evidence: Oversight Group materials, consultation findings and institutional documents relevant to assessing governance safeguards.

END OF SECTION 18 — SAFEGUARDS AGAINST ANTI-BLACK RACISM AND INSTITUTIONAL RACISM: RECOGNITION OF RISK, EQUALITY PROTECTIONS, INDEPENDENT SCRUTINY, COMPLAINTS, ACCOUNTABILITY AND THE RIGHT TO A FAIR DECISION

NEXT: SECTION 19 OF 24 — FINANCIAL TRANSPARENCY AND THE MONEY TRAIL: RESEARCH EXPENDITURE, PROFESSIONAL FEES, CONTRACTS, ADMINISTRATIVE COSTS, COMMITTED CAPITAL, TRANSFERS, INVESTMENTS, GRANTS AND VERIFIED BENEFICIARY RECEIPT.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 19 OF 24

FINANCIAL TRANSPARENCY AND THE MONEY TRAIL: RESEARCH EXPENDITURE, PROFESSIONAL FEES, CONTRACTS, ADMINISTRATIVE COSTS, COMMITTED CAPITAL, TRANSFERS, INVESTMENTS, GRANTS AND VERIFIED BENEFICIARY RECEIPT

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Historical expenditure figures, the original financial commitment and the Commissioners' explanation of their funding arrangements are documented. A complete financial reconciliation through October 2026, including itemised contracts, expenditure, fund transfers and verified beneficiary outcomes, remains outstanding.

19.1. Purpose of this section

This section investigates the financial history and present financial position of Project Spire.

Its central purpose is to establish what money has been spent, what money has been committed, what money remains under institutional control, what money has been transferred, what money has been invested and what financial or material value has actually reached intended reparatory beneficiaries.

The previous sections established that the Church Commissioners announced a £100 million commitment in January 2023.

They also established that the proposed Fund for Healing, Repair and Justice remained subject to legal, regulatory and governance processes.

However, the proposed fund has also required historical research, professional advice, public engagement, communications and programme development.

These activities have financial consequences.

They should therefore be examined as part of a complete financial record.

The investigation must distinguish legitimate costs of institutional preparation from the resources intended to provide reparatory benefit.

It must also distinguish claims made in parliamentary questions from amounts confirmed by the Commissioners.

No financial figure should be treated as established merely because it has appeared in public controversy.

Conversely, a general institutional assurance should not automatically replace detailed accounting records.

RNL's objective is a comprehensive, independently reviewable money trail.

19.2. The fundamental financial distinctions

The financial investigation must distinguish several stages.

An **announcement** is a public statement of intention.

A **commitment** is an undertaking to provide resources, subject to its terms.

An **authorisation** establishes permission to undertake a particular transaction.

An **allocation** identifies resources assigned to a purpose.

An **expenditure** is a cost actually incurred or recognised.

A **transfer** involves movement of money or assets between identifiable holders.

An **investment** places capital into a financial or commercial arrangement.

A **grant** is a transfer subject to particular charitable or programme conditions.

A **receipt** establishes that the intended recipient obtained the money or asset.

A **verified reparatory benefit** establishes what value reached the intended community and what outcome resulted.

These categories must not be conflated.

The same £100 million cannot be counted repeatedly as a commitment, an allocation, a transfer and an investment as though each stage created an additional £100 million.

The investigation must follow the same resources through successive stages without double counting.

19.3. The original £100 million commitment

On 10 January 2023, the Church Commissioners announced a £100 million commitment intended to support a reparatory response to their historical financial connections with African chattel enslavement.

The original programme contemplated investment, research and engagement over a nine-year period.

That announcement is a documented institutional undertaking.

However, the existence of the commitment does not establish that the money was immediately transferred to the proposed Fund for Healing, Repair and Justice.

It also does not establish that the money was distributed to affected communities.

The investigation must therefore trace what happened after the announcement.

The first requirement is to identify the formal financial decision.

The second is to establish the legal mechanism through which the commitment may be implemented.

The third is to identify actual movements of money and assets.

Only then can the programme's financial delivery be accurately assessed.

19.4. The first verified Project Spire expenditure figure

A parliamentary answer given by Marsha De Cordova MP on 30 August 2025 provides the most specific publicly identified expenditure figure examined in this section.

In response to Question 65336, the Commissioners stated that approximately £1 million had been spent in connection with Project Spire from 2019 through the end of the financial year on 31 December 2024.

The response described expenditure on commissioning research and developing the institutional response.

This is a significant documentary finding.

It establishes that Project Spire-related expenditure occurred before the proposed fund became operational.

It also supplies a defined reporting period.

However, the figure is approximate.

It is not a complete breakdown of individual transactions.

Nor does it cover expenditure incurred during 2025 or 2026.

The investigation should therefore use the figure as a historical benchmark rather than a complete current total.

Primary parliamentary evidence:

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

19.5. The categories included within the £1 million

The Commissioners' parliamentary response identified several expenditure categories.

These were forensic accounting, risk management, consultation, engagement events, communications, governance and ancillary matters.

This information is important because it demonstrates that the reported figure involved more than the original forensic accounting exercise.

It covered multiple elements of programme development.

However, the response did not state how much was spent within each category.

It did not identify every supplier or contract.

It did not provide transaction dates or a complete list of payments.

The investigation must therefore obtain an itemised or appropriately aggregated breakdown.

That breakdown should permit the public to distinguish historical research from programme administration and wider engagement.

19.6. The deliberate exclusion of internal staff time

The parliamentary response expressly stated that the approximate £1 million figure did not include an estimate of internal staff time.

The Commissioners explained that such time could not readily be separated from the general administration of the Church Commissioners' Secretariat without disproportionate cost.

This is a significant qualification.

The £1 million should not be described as the complete economic cost of Project Spire through December 2024.

It represents the reported expenditure within the Commissioners' chosen accounting scope.

Internal staff work may also have supported the programme.

However, the absence of a staff-time estimate does not justify inventing an additional cost.

The investigation should ask whether any reasonable methodology could be used to report staff resources without imposing disproportionate administrative burdens.

It should also establish whether dedicated Project Spire staff or separately identifiable staff budgets exist.

19.7. Why the reporting period matters

The approximate £1 million relates to expenditure incurred between 2019 and 31 December 2024.

It was disclosed publicly in August 2025.

These dates must remain separate.

A figure published in 2025 does not necessarily include spending during 2025.

Nor can it be treated as the amount spent through October 2026.

The investigation should therefore seek subsequent figures for the financial years ending 31 December 2025 and the latest available period in 2026.

Where final annual accounts are unavailable, a clearly dated management-accounting statement may assist.

Any interim figure should be identified as provisional where appropriate.

The objective is to avoid relying indefinitely on a historical amount when later expenditure may have occurred.

19.8. The disputed £5 million expenditure claim

In June 2025, Neil O'Brien MP submitted a parliamentary question asking why the Commissioners had spent £5 million on Project Spire before Charity Commission approval.

The Commissioners' response, published in July 2025, expressly rejected the stated expenditure amount.

They explained that spending had been limited to proportionate historical research and consideration of their response, including steps towards regulatory authorisation.

This is an important example of a disputed financial figure.

The investigation should preserve the original question and response.

However, it must not adopt the £5 million amount as confirmed expenditure.

The figure appeared in a question.

The institution responsible for the expenditure disputed it.

The appropriate evidential position is that the claim was made, rejected and requires independent accounting evidence if it is to be established.

Primary source:

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

19.9. The separate disputed £5 million forecast

A further parliamentary question concerned an alleged £5 million spending forecast for Project Spire during the 2026–28 triennium.

On 1 September 2025, the Commissioners stated that they did not recognise £5 million as their forecast figure for Project Spire.

They explained that the triennium planning process uses higher-level forecasts intended to provide strategic flexibility.

This is not the same issue as the earlier allegation of £5 million already spent.

The investigation must therefore preserve two distinct disputes.

One concerned past expenditure.

The other concerned prospective expenditure.

The Commissioners rejected the £5 million figure in both contexts.

However, rejection of those figures does not establish the exact value of all future approved budgets.

The investigation should obtain the actual Project Spire forecast and expenditure information that can properly be disclosed.

Primary source:

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

19.10. The £100 million remained in the general fund in September 2025

The September 2025 parliamentary answer also provided an important clarification concerning the original commitment.

The Commissioners stated that the £100 million remained in their general fund pending regulatory authorisation.

They explained that the sum would not be deployed before the required authorisation had been obtained.

This confirms a material distinction between announcing the £100 million commitment and transferring the money to a separate charitable fund.

It also explains why preparatory spending could occur before the proposed fund became operational.

However, the statement concerns the position reported in September 2025.

It must not automatically be treated as definitive evidence of the position on 18 October 2026.

RNL should seek the current status of the capital and all relevant regulatory authorisations.

19.11. The source of Project Spire funding

The Commissioners have stated that Project Spire is financed from the endowment under their management.

They have distinguished that source from money collected directly by individual parishes.

In parliamentary answers, the Commissioners explained that money given through parish collections would not fund the proposed programme.

This is relevant to public debate about competing financial priorities.

However, the source of the funds does not resolve every question concerning financial authority.

Endowment assets remain subject to applicable charitable obligations.

The investigation must establish which legal powers and internal approvals govern the proposed transfer.

It should also distinguish the financing of preparatory research from the eventual financing of the separate fund.

The purpose is to identify the actual financial source and the legal basis for its use.

19.12. Forensic accounting expenditure

The original historical research involved Grant Thornton UK LLP and specialist academic input.

Forensic accounting formed part of the work that led to the Commissioners' acknowledgement of historical financial connections.

The parliamentary response identifies forensic accounting as one of the categories within the reported expenditure.

However, the exact amount paid for the forensic work has not been established through the sources examined.

Nor has RNL obtained the complete contract, invoices, procurement documents or schedule of payments.

The investigation should therefore request a breakdown identifying the commissioning institution, contract period, scope, fees and deliverables.

This does not presume that the expenditure was unreasonable.

It seeks the evidence necessary to assess what services were obtained and how the costs were authorised.

19.13. Historical research and academic consultancy

Historical research may involve professional historians, academic institutions, archival specialists and additional reviewers.

The Commissioners' January 2026 statement explained that the forensic investigation was supported by historians and that further academic work had been undertaken during 2025.

Such work may be necessary to establish a reliable institutional historical record.

However, the investigation should distinguish paid consultancy from unpaid academic contributions and ordinary institutional employment.

It should also establish whether research was commissioned directly by the Church Commissioners or through another institution.

Relevant records may identify contracts, grants, research agreements and deliverables.

The purpose is to establish the financial and organisational structure of the research.

No individual should be presumed to have received payment merely because their name appears in a programme or publication.

19.14. The Lambeth Palace Library archival activities

Sections 7 and 8 identified published material concerning Church-related archival research involving Kwesi Ochosi and other researchers.

A first-hand account associated that work with Project Spire.

The investigation should therefore establish whether the relevant archival posts or activities were financed through Project Spire budgets.

It should identify the commissioning institution, the period of work and the nature of the arrangement.

However, the published evidence does not establish that Kwesi Ochosi personally controlled project finances.

Nor does it establish the amount of any remuneration.

The investigation should seek institutional financial information relevant to the public programme without unnecessarily demanding confidential personal details.

The objective is proper accounting for research expenditure.

19.15. Charmaine Simpson's research and engagement responsibilities

Published Church-related materials identify Charmaine Simpson as holding a Research and Engagement Coordinator role associated with the Church Commissioners.

Separate materials describe her involvement in Project Spire-related work.

These records warrant examination of the institutional and financial arrangements supporting the role.

Relevant questions concern the commissioning or employing organisation, dates, budgetary source, responsibilities and reporting lines.

However, the existence of a professional role does not establish authority over the proposed £100 million fund.

Nor does it establish that her separate activities through Black History Studies were paid for by Project Spire.

These relationships must be documented independently.

The investigation should not infer financial transfers from overlapping professional involvement alone.

19.16. Consultation and engagement event expenditure

The Oversight Group's consultation process included engagement activities in Britain and other locations.

Such events may involve venue costs, facilitation, travel, administration, communications and other expenses.

The Commissioners' expenditure statement specifically included consultation and engagement events.

However, the exact allocation to these activities remains unverified.

The investigation should seek aggregate financial information concerning each consultation programme.

It should establish which institutions commissioned and organised the activities.

It should also identify whether participants received fees, reimbursement or other support.

Such arrangements may be legitimate and necessary.

The purpose of scrutiny is to understand cost, authorisation and the contribution of expenditure to the programme's stated objectives.

19.17. Communications expenditure

The parliamentary response identified communications among the categories of Project Spire spending.

Communications may include production of reports, public information, digital material, event publicity and related professional services.

Such spending can support transparency.

However, it should be recorded separately from reparatory investment and grant-making.

The investigation should establish what communications activities were commissioned, by whom and at what cost.

It should also distinguish ordinary institutional communication from work specifically attributable to Project Spire.

The existence of professional communications expenditure does not itself establish inappropriate use of resources.

Its value should be assessed against the documented purpose and results.

19.18. Risk management expenditure

The Commissioners' reported expenditure included risk management.

This is relevant because the programme involves legal, regulatory, financial, historical and reputational questions.

The Commissioners' January 2026 statement connected their historical research with responsible investment and institutional risk management.

The investigation should seek clarification of what activities were included within the risk management category.

These may concern legal compliance, financial exposure, governance, security or other institutional risks.

No specific activity should be presumed without evidence.

The institution should identify the general nature of the services and their costs, subject to lawful confidentiality restrictions.

The objective is to understand how risk-related expenditure supported the programme.

19.19. Governance-development expenditure

The proposed Fund for Healing, Repair and Justice requires legal and governance arrangements.

The Church Commissioners' implementation materials identify a Governance Workstream.

Relevant expenditure may include advice concerning charitable objects, trustee structures, financial controls and regulatory applications.

The parliamentary response includes governance among the reported cost categories.

However, no complete breakdown has yet been obtained.

The investigation should identify the relevant contracts and their purposes.

It should also distinguish the costs of developing a proposed fund from funds actually transferred to that entity.

A professionally prepared governance structure may be necessary for reparatory delivery.

Nevertheless, its costs must not be confused with completed reparatory grants.

19.20. Legal and regulatory expenditure

Project Spire has involved discussions with the Charity Commission and consideration of the statutory arrangements required for the proposed fund.

Legal advice and regulatory preparation may therefore form part of programme costs.

However, the exact amount of legal expenditure remains unverified.

The investigation should request aggregated costs and relevant procurement information.

It should recognise that privileged legal advice may not be disclosed.

Nonetheless, legal professional privilege does not automatically prevent publication of the total cost of legal services, the names of relevant institutions where disclosure is lawful, or the general categories of work commissioned.

The Commissioners should explain any specific limits upon disclosure.

The objective is financial transparency without compromising lawful protections.

19.21. Professional fees and procurement procedures

Professional fees should be examined through the procurement process applicable to each contract.

The investigation should establish whether services were commissioned competitively or through another authorised procedure.

It should identify approval limits, conflict-of-interest requirements and arrangements for assessing value for money.

A competitive tender is not necessarily required for every professional service.

The legal and institutional requirements may vary according to contract value, urgency, specialist expertise and other factors.

The investigation must therefore establish which rules actually applied.

It should not presume procurement wrongdoing merely because a contract was awarded to a named supplier.

The appropriate questions concern authority, compliance, transparency and the work delivered.

19.22. The distinction between fees, salaries and reimbursements

Financial payments associated with Project Spire may take different forms.

A salary is remuneration through an employment relationship.

A consultancy fee is payment for services under a contract.

An honorarium may be a payment recognising a contribution.

A reimbursement may repay legitimate expenses incurred.

A grant supports an approved purpose and may not constitute payment for services.

These categories have different accounting and governance implications.

The investigation should therefore seek accurate classifications.

It should not treat every payment to an individual as a consultancy fee.

Nor should it treat every payment to an organisation as reparatory funding.

The legal purpose and financial treatment of each transaction must be established.

19.23. Internal staff costs and the limits of the existing figures

The parliamentary answer excluded internal staff time from the approximate £1 million expenditure figure.

This creates an important limitation when evaluating total project cost.

However, a complete economic-cost assessment does not necessarily require disclosure of individual employees' salaries.

The institution may be able to provide aggregated staffing estimates or explain why such estimates are not reasonably available.

The investigation should ask whether dedicated posts, budgets or cost centres exist for Project Spire.

It should also identify whether central administrative functions provide significant support.

The purpose is to understand the programme's full resource demands without imposing unjustified requests for private information.

19.24. The question of administrative expenditure after December 2024

The verified approximate £1 million figure covers the period ending in December 2024.

Further institutional activity continued during 2025 and 2026.

This included legal preparation, governance development, professional research and public engagement.

Such activity may have generated additional expenditure.

However, the amounts cannot be inferred from the existence of the activities.

The investigation must seek a dated financial reconciliation.

That reconciliation should identify actual expenditure during 2025 and the available portion of 2026.

Where budgets were approved but not spent, those amounts should be recorded separately.

The absence of a current figure must not be filled through speculation.

19.25. The Oversight Group's recommendation concerning costs

The Oversight Group recommended that the full original £100 million commitment should be preserved for reparatory impact rather than reduced by initial operating costs.

It proposed that the Church Commissioners finance relevant initial administration separately.

This recommendation provides an important benchmark.

The investigation should establish whether the Commissioners adopted it formally.

It should also determine how preparatory expenditure has been classified.

If the expenditure has been financed separately from the proposed £100 million, that should be recorded.

If any expenditure has been charged against the commitment, the Commissioners should explain the authorisation and rationale.

The investigation must assess actual accounting treatment, not merely the original recommendation.

19.26. The meaning of capital being reserved

A commitment may be accompanied by internal financial arrangements indicating that resources have been reserved.

However, a reserve within an existing endowment does not necessarily constitute a transfer to an independent fund.

The parliamentary answer of September 2025 stated that the £100 million remained within the Commissioners' general fund.

This suggests that the proposed resources had not yet moved into a new recipient entity at that reporting date.

However, the investigation should obtain current confirmation.

It should establish whether any accounting designation, reserve or other internal mechanism has been created.

Such arrangements must be distinguished from actual cash or asset transfers.

The words *committed*, *reserved*, *allocated* and *transferred* must not be used interchangeably.

19.27. The requirement for regulatory authorisation

Section 15 examined the proposed use of section 106 of the Charities Act 2011 and the arrangements for registering a new charity.

These matters have direct financial consequences.

A proposed transfer should not be counted as completed before the relevant legal authority and transaction evidence are established.

The investigation should identify the date and terms of any regulatory authorisation.

It should then identify the corresponding transfer records.

The existence of permission to transfer money is not necessarily evidence that the transfer has occurred.

Similarly, a transfer should be distinguished from subsequent expenditure by the receiving entity.

A complete money trail must connect each stage through identifiable documents.

19.28. The proposed fund's accounts

If a separate Fund for Healing, Repair and Justice is registered and begins operating, it should maintain appropriate accounts.

Those accounts may provide information concerning assets received, investment holdings, income, expenditure, grants and administrative costs.

The investigation should identify the relevant legal entity and its reporting obligations.

It should obtain annual accounts and any available audited statements.

Where a fund is newly established, complete annual accounts may not yet exist.

The absence of accounts before the first reporting period is not automatically evidence of wrongdoing.

However, the institution should provide a clear explanation of the current financial position and the reporting timetable.

19.29. Investment capital and investment transactions

The proposed programme includes impact investment.

An actual investment should be recorded only when sufficient evidence demonstrates that capital has been deployed.

The investigation should identify the amount invested, the recipient, the date, the legal instrument and the programme purpose.

It should also determine whether the transaction involves equity, lending, another investment instrument or a non-repayable payment.

The investment's financial terms matter.

For example, a repayable loan to a community enterprise creates a different relationship from an outright grant.

An equity investment may leave ownership of the capital within the fund.

The investigation should identify how the transaction is expected to produce reparatory benefits.

These benefits must subsequently be assessed independently.

19.30. Investment returns and losses

An investment portfolio may generate income, capital gains or losses.

Those outcomes affect the financial resources available for future investment and grants.

The investigation should therefore establish how returns are measured and reported.

It should distinguish realised income from changes in market valuation.

It should also identify management fees and other deductions.

The existence of a financial return does not automatically establish that an affected community received a reparatory benefit.

A return retained within the fund may support future activity without constituting present-day delivery.

Similarly, an investment loss should be reported transparently rather than omitted from the public account.

19.31. Grant-making expenditure

A grant should be recorded only when the relevant award and payment details are established.

The investigation should identify the awarding body, recipient, date, amount, purpose and conditions.

It should distinguish a grant approval from a completed payment.

An announced grant programme is not evidence that grants have been awarded.

A grant award is not automatically evidence that funds have been received.

A received grant is not proof that its intended outcomes have been achieved.

These stages require separate records.

The Church Commissioners' official information examined for this investigation states that the proposed fund is not yet operational.

RNL should therefore avoid describing future grant-making intentions as completed distribution.

19.32. The identity of ultimate beneficiaries

The proposed fund is intended to benefit communities affected by the legacies of African chattel enslavement.

However, the immediate financial recipient may not be the ultimate beneficiary.

For example, money may be transferred to an investment fund.

That fund may invest in a business.

The business may subsequently employ people, provide services or support community activity.

These are different stages of benefit.

The investigation should identify who ultimately receives value.

It should also establish how the programme determines whether the benefit is reparatory rather than merely an ordinary commercial outcome.

A transfer into an investment vehicle must not automatically be counted as a transfer to affected communities.

19.33. Verification of receipt

Financial delivery requires evidence of receipt.

Depending upon the transaction, relevant evidence may include a payment confirmation, recipient acknowledgement, audited account or other reliable record.

The investigation should not disclose confidential banking information unnecessarily.

It may be sufficient to obtain properly redacted or independently audited confirmation.

However, an institution's announcement that resources are available should not replace evidence that they reached the intended recipient.

The purpose is to establish a reliable chain of financial accountability.

RNL should preserve the distinction between an approved transaction and an independently verified receipt.

19.34. Verification of outcomes

Receipt of money is not identical to achievement of the intended reparatory outcome.

A grant may finance a project that subsequently experiences difficulties.

An investment may create fewer benefits than anticipated.

A programme may achieve its objectives only partly.

Such outcomes should be documented accurately.

The investigation should therefore examine the methods used to measure social and economic impact.

It should identify who performs the evaluation and whether beneficiaries can challenge inaccurate descriptions.

The objective is not to demand success in every activity.

It is to distinguish verified outcomes from untested claims.

19.35. Financial relationships with external organisations

Earlier sections identified associations involving Project Spire-related personnel, Black History Studies, Building Trust Consortium and the Global Reparations Hub.

Those records justify questions concerning possible financial relationships.

However, the existence of overlapping personnel does not establish that Project Spire funded any of those external organisations.

The investigation should therefore request confirmation of any relevant grants, contracts, sponsorships or other payments.

If no such relationships exist, that should be recorded.

If relationships exist, the institution should identify their purpose, authorisation and financial treatment.

RNL must not infer financial control or misconduct merely from participation in related public events.

19.36. The Global Reparations Hub financial question

The separate GRH investigation concerns the formation, governance, funding and institutional authority of that initiative.

Project Spire's money trail must remain distinct.

The present investigation should ask whether the Church Commissioners made any payment, grant, investment or contractual commitment to the GRH or an organisation acting on its behalf.

It should also ask whether any Project Spire budget supported the London launch of 17 October 2026.

No such financial relationship has been established by the evidence examined.

The question is legitimate because of documented overlapping professional involvement.

However, it must remain an open question until supported by financial or contractual records.

19.37. Research relationships involving external institutions

Church-related historical research has involved professional accountants, academics, archival institutions and engagement personnel.

Some of these activities may have been commissioned through contracts with organisations rather than directly with individuals.

The investigation should therefore identify the contractual chain.

It should distinguish the commissioning institution, the contracting entity, the service provider and any subcontractors where relevant.

Such distinctions may explain why a person appears in public records without being directly employed by the Church Commissioners.

They also affect which institution holds payment and procurement records.

The purpose is to establish the facts rather than assume a direct financial relationship from a professional biography.

19.38. Conflicts of interest in financial decisions

The proposed financial programme may involve professional advisers, investment managers, community representatives and potential beneficiaries.

Conflicts of interest may arise where a person involved in a decision has a financial or organisational interest in its outcome.

However, the existence of a possible conflict does not establish that an improper decision occurred.

The investigation must identify relevant duties, disclosure requirements and safeguards.

It should establish whether interested persons are required to declare relationships or withdraw from decisions.

It should also examine how contracts and investments are approved.

The objective is to ensure that the movement of public-facing reparatory resources can be scrutinised appropriately.

19.39. Transparency concerning supplier selection

Professional suppliers may provide services involving accounting, law, communications, research or programme development.

The investigation should establish whether the Commissioners used appropriate procurement procedures.

It should identify whether contracts were competitively tendered, directly awarded under an authorised exception or otherwise commissioned.

The applicable procedures may depend upon the value and nature of the service.

A direct award is not automatically improper.

However, the institution should be capable of explaining the decision.

The investigation should seek appropriately detailed information concerning procurement authority, supplier selection and the services delivered.

19.40. The problem of incomplete financial disclosure

A public financial statement may provide an aggregate amount without identifying the transactions composing it.

Such statements can be useful but may not permit independent reconciliation.

The approximate £1 million figure is an example.

It establishes a reported historical total and expenditure categories.

However, it does not provide sufficient detail to establish what was paid to each supplier or how much was spent in each category.

RNL should therefore request further financial information.

Where detailed invoices contain protected personal or commercially sensitive information, suitable redactions or aggregate schedules may be appropriate.

The objective is proportionate transparency.

A refusal to disclose a particular confidential document should not automatically be treated as evidence of wrongdoing.

19.41. Financial statements versus management accounts

Annual financial statements provide an institution-wide accounting record.

However, a large institution may not publish every project cost separately.

Project-level management accounts may contain more detailed budget information.

The investigation should therefore distinguish the evidence available from published annual accounts from information held internally.

It should seek a Project Spire schedule reconciling the programme to the Commissioners' accounts.

The schedule should identify relevant cost centres, budgets, expenditure and accounting treatment.

Such information would permit the approximate parliamentary figure to be reconciled with later financial periods.

The institution should explain whether such records exist and what can lawfully be disclosed.

19.42. The risk of double counting

A complete money trail must prevent double counting.

For example, the same £100 million might be announced as a commitment, earmarked within the general fund, transferred to a new charity and invested.

These are stages in the movement of one amount.

They are not four separate contributions.

Similarly, investment returns retained within the fund are not automatically grants.

A grant approved but not paid should not be counted as received.

A payment received by an intermediary should not automatically be counted as reparatory benefit delivered to the final community.

The investigation should therefore use transaction identifiers and clear accounting classifications.

This will help ensure that the reported scale of financial delivery is accurate.

19.43. The risk of undercounting

Financial investigations must also avoid undercounting.

The approximately £1 million expenditure figure expressly excludes internal staff time.

It may also omit later spending outside the reporting period.

A total that includes only external payments may not capture all institutional resources committed to programme development.

However, an investigator must not invent an additional amount simply because some costs are excluded.

The correct approach is to identify the limitation and seek clarification.

Where an estimate is produced, its methodology should be documented.

The investigation should distinguish recorded expenditure from estimated economic cost.

This permits readers to understand precisely what each figure represents.

19.44. The need for a complete reconciliation through October 2026

RNL should request a comprehensive financial reconciliation covering the programme from its beginning in 2019 through the latest available reporting date.

The reconciliation should identify spending during each financial year.

It should distinguish research, consultancy, communications, engagement, governance, legal and administrative expenditure.

It should also identify approved but unspent budgets.

The original £100 million commitment should be shown separately.

Any authorised transfers or investments should be recorded with dates and values.

Where no transfers or grants have occurred, that position should be confirmed in writing.

The reconciliation should permit readers to follow the money without confusing preparatory expenditure with reparatory delivery.

19.45. A permanent Project Spire transaction register

RNL should maintain a permanent transaction register.

Each transaction should have a unique identifier.

The register should record the date, paying institution, receiving organisation, amount, currency, purpose, contractual or legal basis, budget category and supporting evidence.

Where the transaction is an investment, the relevant asset or financial instrument should be identified.

Where it is a grant, the recipient and programme purpose should be recorded.

Where it is a research or administrative cost, the service and reporting period should be identified.

The register should also indicate whether the transaction has been independently verified.

Corrections should be recorded as new entries or clearly linked adjustments rather than silently overwriting historical information.

19.46. A separate commitment register

Commitments should be recorded separately from completed financial transactions.

The original £100 million undertaking should have its own commitment entry.

Any additional legally secured commitments should be recorded individually.

The proposed £1 billion ambition should not appear as an actual asset unless supporting evidence establishes that status.

Conditional pledges should be distinguished from unconditional commitments.

Expressions of interest should be recorded as expressions of interest.

Future investment-return forecasts should not be treated as money already available.

This structure would permit the public to understand both the ambitions of the programme and its actual financial position.

19.47. A verified beneficiary register

RNL should also maintain a register of confirmed reparatory beneficiaries.

The register should identify the recipient organisation or beneficiary category, the type of benefit, the date and the available verification.

Where privacy protections apply, identifying details may need to be withheld or aggregated.

However, the public should still be able to understand the scale and nature of delivery.

A grant should be distinguished from a loan.

A loan should be distinguished from an equity investment.

A financial transfer should be distinguished from an achieved social outcome.

The purpose is to demonstrate reparatory delivery through verifiable evidence rather than publicity alone.

19.48. Independent audit and review

An independent financial audit may provide assurance concerning the accuracy of accounts.

However, the scope of the audit matters.

An audit of an institution's annual accounts does not automatically verify the reparatory outcomes of every individual programme.

The investigation should therefore establish what independent financial scrutiny Project Spire receives.

It should identify whether project-level expenditure is subject to audit.

It should also determine whether future investment and grant-making activities will receive independent review.

Where an audit opinion is available, its scope and limitations should be recorded.

Financial accounting assurance and verification of reparatory benefit are related but distinct forms of scrutiny.

19.49. Anti-Black racism and Institutional Racism safeguards in financial administration

RNL seeks evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism within Project Spire's financial administration.

Relevant questions concern supplier appointments, procurement, investment decisions, beneficiary eligibility and grant-making.

The investigation should establish whether financial procedures include measures to prevent discriminatory treatment.

It should also determine whether affected organisations can obtain reasons for decisions and seek independent review.

The existence of professional accountants and financial procedures does not automatically demonstrate that every form of racial bias has been addressed.

Nor does the request for safeguards establish that discrimination has occurred.

RNL makes no accusations or allegations of wrongdoing.

The investigation seeks documentary evidence of the protections relied upon.

19.50. Financial opacity and preventative conflict management

Reparatory justice concerns historical suffering and potentially substantial financial resources.

Unclear financial information may contribute to misunderstanding about who controls money and whether affected communities have received benefits.

RNL maintains that transparency and professional organisation are foundations for peace.

The possibility that serious unresolved disputes could escalate into intimidation, threats of violence or physical confrontation should be considered as a preventative risk.

This is not a prediction that violence will occur.

It is not an accusation against the Church Commissioners, programme personnel or affected communities.

The objective is to reduce unnecessary conflict through accurate financial reporting, accessible procedures and fair opportunities to challenge decisions.

Financial transparency is therefore an important element of institutional conflict prevention.

19.51. Priority questions concerning historical expenditure

Question 19.1: What is the complete Project Spire expenditure for each financial year from 2019 through 2025?

Question 19.2: What is the latest available expenditure figure for 2026?

Question 19.3: What accounting methodology was used to produce the approximate £1 million figure reported through 31 December 2024?

Question 19.4: What amounts were spent on forensic accounting?

Question 19.5: What amounts were spent on historical and academic research?

Question 19.6: What amounts were spent on risk management?

Question 19.7: What amounts were spent on consultation and engagement events?

Question 19.8: What amounts were spent on communications?

Question 19.9: What amounts were spent on governance and regulatory preparation?

Question 19.10: What amounts were included under ancillary expenditure?

19.52. Priority questions concerning staff and professional services

Question 19.11: What dedicated staff posts have been established for Project Spire?

Question 19.12: What aggregated staff expenditure can be identified?

Question 19.13: Why was internal staff time excluded from the previously reported figure?

Question 19.14: Can a proportionate estimate of internal staff resources be produced?

Question 19.15: Which organisations received contracts for professional research or consultancy?

Question 19.16: What were the dates, purposes and values of those contracts?

Question 19.17: What procurement procedures were applied?

Question 19.18: What deliverables were required?

Question 19.19: What procedures ensured value for money?

Question 19.20: What conflict-of-interest safeguards applied to commissioning decisions?

19.53. Priority questions concerning the disputed £5 million figures

Question 19.21: What records were examined when the Commissioners rejected the allegation that £5 million had already been spent?

Question 19.22: What was the exact expenditure total at the date of that response?

Question 19.23: What was the source of the £5 million figure referred to in parliamentary questions?

Question 19.24: Did any internal planning document contain a similar amount for a broader category of work?

Question 19.25: What spending forecasts were actually approved for 2026–28?

Question 19.26: How were those forecasts distinguished from expenditure already incurred?

Question 19.27: Have relevant forecasts subsequently changed?

Question 19.28: Will the Commissioners publish a dated explanation reconciling the disputed figures?

Question 19.29: What is the present approved Project Spire budget, excluding the £100 million proposed fund capital?

Question 19.30: What expenditure has been committed contractually but not yet incurred?

19.54. Priority questions concerning the £100 million commitment

Question 19.31: Where is the original £100 million commitment currently held?

Question 19.32: What accounting designation applies to it?

Question 19.33: Has any part of the amount been legally transferred?

Question 19.34: If so, what authorisation supported the transfer?

Question 19.35: What are the dates and amounts of any completed transfers?

Question 19.36: What legal entity received the resources?

Question 19.37: Has any part been allocated to investments?

Question 19.38: Has any part been allocated to grants?

Question 19.39: Have any operating costs been charged against the commitment?

Question 19.40: Will the Commissioners publish a complete reconciliation showing the current status of the entire £100 million?

19.55. Priority questions concerning investments and grants

Question 19.41: What investments have been formally approved under Project Spire?

Question 19.42: What investments have actually been completed?

Question 19.43: What financial instruments were used?

Question 19.44: What investment returns or losses have been recorded?

Question 19.45: What management fees apply?

Question 19.46: What grants have been formally awarded?

Question 19.47: What grants have actually been paid?

Question 19.48: Which recipients have acknowledged receipt?

Question 19.49: What independently verified reparatory outcomes have resulted?

Question 19.50: How are commercial investment outcomes distinguished from reparatory benefits?

19.56. Priority questions concerning institutional relationships

Question 19.51: Did any Project Spire budget finance work undertaken by Black History Studies?

Question 19.52: If so, through what contractual arrangement and for what purpose?

Question 19.53: Did any Project Spire budget finance work undertaken by Building Trust Consortium?

Question 19.54: If so, through what arrangement and for what purpose?

Question 19.55: Did the Church Commissioners provide any funding, sponsorship or financial support to the Global Reparations Hub?

Question 19.56: Was any Project Spire funding used in connection with the GRH launch on 17 October 2026?

Question 19.57: What were the funding arrangements for relevant Lambeth Palace Library research posts?

Question 19.58: Which institution authorised expenditure on those posts?

Question 19.59: What procedures governed any overlapping professional roles?

Question 19.60: Will the Commissioners provide written confirmation of the existence or absence of the relevant financial relationships?

These questions seek clarification.

They do not presume that a payment occurred or that any relationship was improper.

19.57. Priority questions concerning financial safeguards

Question 19.61: What anti-fraud and financial-control procedures apply to Project Spire?

Question 19.62: What safeguards exist against anti-Black racism and Institutional Racism affecting procurement and financial decisions?

Question 19.63: How are financial conflicts of interest declared and managed?

Question 19.64: Who independently audits Project Spire expenditure?

Question 19.65: What public information is available concerning professional fees and administrative costs?

Question 19.66: Can affected communities challenge investment or grant-making decisions?

Question 19.67: What protections exist against victimisation where financial concerns are raised?

Question 19.68: What procedures govern correction of inaccurate financial statements?

Question 19.69: How does the institution prevent double counting of commitments and financial outcomes?

Question 19.70: What independent mechanism will verify the eventual receipt of reparatory benefits?

19.58. Preliminary financial findings

The Church Commissioners announced a £100 million commitment in January 2023.

The institution subsequently undertook preparatory research, engagement and programme-development activities.

In a parliamentary answer given on 30 August 2025, the Commissioners stated that approximately £1 million had been spent from 2019 through 31 December 2024.

The figure included forensic accounting, risk management, consultation, engagement events, communications, governance and ancillary costs.

It excluded an estimate of internal staff time.

The Commissioners separately rejected claims that £5 million had already been spent and that £5 million represented a recognised Project Spire forecast for the 2026–28 triennium.

In September 2025, they stated that the £100 million remained in their general fund pending regulatory authorisation.

These are substantial documentary findings.

However, the investigation has not obtained a complete itemised expenditure reconciliation for 2019–2026.

It has not established the total cost of internal staff resources.

It has not established the exact amounts paid to every relevant professional supplier.

It has not verified financial transfers from Project Spire to the Global Reparations Hub or other external organisations examined in earlier sections.

Nor has it established completed investments, grants or beneficiary receipts under the proposed fund.

Those matters remain open.

19.59. Conclusion: the money must be followed from the first invoice to the final beneficiary

Project Spire has a documented history of expenditure preceding operation of the proposed Fund for Healing, Repair and Justice.

The Church Commissioners have identified approximately £1 million in programme-related spending through December 2024.

That figure is important but incomplete.

It does not include separately unquantified internal staff time.

It does not cover the whole period through October 2026.

It does not provide a detailed list of suppliers, contracts or transactions.

The institution's rejection of disputed £5 million figures must also be recorded accurately.

An unverified allegation should not be adopted as a financial finding.

However, the absence of a complete reconciliation leaves important questions unanswered concerning the amount and purpose of expenditure.

The original £100 million commitment must remain separate from those preparatory costs unless evidence demonstrates a specific accounting relationship.

The same resources must not be counted repeatedly as they move through authorisation, transfer, investment and grant-making.

A transfer to an investment fund is not automatically equivalent to reparations received by affected communities.

An investment intended to produce social benefit is not proof that the benefit occurred.

A grant award is not necessarily a completed payment.

A payment is not necessarily a verified outcome.

The central conclusion of Section 19 is that Project Spire's preparatory expenditure is documented in aggregate, while a complete financial money trail—covering contracts, professional fees, administration, committed capital, regulatory transfers, investments, grants and verified reparatory receipt—has not yet been established through the available evidence.

RNL will therefore seek a full institutional reconciliation and construct a permanent financial evidence register.

The objective is to make the movement of resources visible, verifiable and open to legitimate scrutiny.

RNL will pursue this work without making unsupported accusations or predetermined findings.

The investigation seeks professional organisation, transparent financial accountability, effective safeguards against possible anti-Black racism and Institutional Racism, and the peaceful delivery of reparatory justice.

SECTION 19 — FINANCIAL EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-19-001	Original £100 million commitment announced January 2023	Official institutional record

SPIRE-19-002	Approximately £1 million spent from 2019 through December 2024	Parliamentary answer, 30 August 2025
SPIRE-19-003	Forensic accounting included in reported expenditure	Official parliamentary statement
SPIRE-19-004	Risk management included in reported expenditure	Official parliamentary statement
SPIRE-19-005	Consultation and engagement included in reported expenditure	Official parliamentary statement
SPIRE-19-006	Communications included in reported expenditure	Official parliamentary statement
SPIRE-19-007	Governance and ancillary costs included	Official parliamentary statement
SPIRE-19-008	Internal staff time excluded from approximately £1 million	Explicit qualification
SPIRE-19-009	Claim that £5 million had already been spent	Parliamentary claim disputed by Commissioners
SPIRE-19-010	Alleged £5 million forecast for 2026–28	Commissioners stated figure not recognised
SPIRE-19-011	£100 million remained in general fund in September 2025	Official dated statement
SPIRE-19-012	Complete expenditure for 2025	Outstanding
SPIRE-19-013	Complete expenditure for 2026 to latest available date	Outstanding
SPIRE-19-014	Complete supplier and contract register	Outstanding
SPIRE-19-015	Aggregated internal staff cost	Outstanding
SPIRE-19-016	Full expenditure reconciliation from 2019	Outstanding

SPIRE-19-017	Current legal allocation and transfer of £100 million	Verification required
SPIRE-19-018	Completed fund investments	Verification required
SPIRE-19-019	Completed grants to affected communities	Verification required
SPIRE-19-020	Independently verified beneficiary receipt and outcomes	Not established by sources examined
SPIRE-19-021	Financial relationships with GRH, Black History Studies or Building Trust Consortium	Not established
SPIRE-19-022	Project-specific anti-racism and financial accountability safeguards	Further verification required

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SOURCES AND INDEPENDENT VERIFICATION

Source 19.1 — UK Parliament, Answered 30 August 2025

Church of England: Slavery — Question 65336.

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

Evidence: Approximately £1 million expenditure from 2019 to 31 December 2024, categories included and staff-time exclusion.

Source 19.2 — UK Parliament, Answered 6 July 2025

Church of England: Slavery — Question 63009.

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

Evidence: Commissioners' rejection of the £5 million past-expenditure claim.

Source 19.3 — UK Parliament, Answered 1 September 2025

Church of England: Slavery — Question 69330.

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

Evidence: Disputed £5 million forecast, general-fund status of £100 million and regulatory authorisation requirement.

Source 19.4 — Church of England in Parliament

Church Commissioners Written Questions, 1 September 2025.

https://churchinparliament.org/2025/09/01/church-commissioners-written-questions-religious-buildings-retired-clergy-church-closures-clergy-vacancies-slavery-religious-practice/

Evidence: Consolidated parliamentary explanations concerning Project Spire expenditure and financial authority.

Source 19.5 — Church Commissioners, 10 January 2023

Original research publication and £100 million commitment.

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Evidence: Original financial commitment and programme objectives.

Source 19.6 — Church Commissioners, 19 January 2026

Response to Parliamentarians' Letter Regarding the Fund for Healing, Justice and Repair.

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Evidence: Institutional research, risk management, financial and legal explanations.

Source 19.7 — Church Commissioners, 26 March 2025

From Commitment to Action: Our Continuing Journey.

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

Evidence: Programme workstreams, governance preparation, investment planning, engagement and grant-making development.

Source 19.8 — Oversight Group Report, March 2024

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Evidence: Recommendations concerning preservation of the £100 million commitment, operating costs, investment and grant-making.

Source 19.9 — Church Commissioners' annual publications

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

Evidence: Institutional annual reports and financial statements.

Source 19.10 — Charity Commission register

https://register-of-charities.charitycommission.gov.uk/

Evidence: Verification of any registered recipient charity and its published accounts.

Source 19.11 — Official implementation status

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Published operational status and public enquiry mechanism.

END OF SECTION 19 — FINANCIAL TRANSPARENCY AND THE MONEY TRAIL: RESEARCH EXPENDITURE, PROFESSIONAL FEES, CONTRACTS, ADMINISTRATIVE COSTS, COMMITTED CAPITAL, TRANSFERS, INVESTMENTS, GRANTS AND VERIFIED BENEFICIARY RECEIPT

NEXT: SECTION 20 OF 24 — PROFESSIONAL APPOINTMENTS, CONTRACTORS, CONSULTANTS AND INSTITUTIONAL NETWORKS: COMMISSIONING, REMUNERATION, PROCUREMENT, EXTERNAL AFFILIATIONS, DECLARATIONS AND ACCOUNTABILITY.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 20 OF 24

PROFESSIONAL APPOINTMENTS, CONTRACTORS, CONSULTANTS AND INSTITUTIONAL NETWORKS: COMMISSIONING, REMUNERATION, PROCUREMENT, EXTERNAL AFFILIATIONS, DECLARATIONS AND ACCOUNTABILITY

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Named professional participants, institutional affiliations and certain research responsibilities are documented. Contracting arrangements, appointment procedures, remuneration, complete procurement records, relevant declarations and financial authority require further verification.

20.1. Purpose of this section

This section investigates the appointment, commissioning, supervision, remuneration and accountability of individuals and organisations undertaking professional activities associated with Project Spire.

The investigation has established that Project Spire involved historical research, forensic accounting, academic expertise, archival investigation, community engagement, communications, financial planning, governance development and legal or regulatory preparation.

Such activities require people and institutions to undertake work.

Some may be employees.

Others may be consultants, contractors, researchers, advisers, speakers, volunteers or representatives of independent organisations.

These categories must not be treated as interchangeable.

A person may be publicly associated with Project Spire without being employed directly by the Church Commissioners.

An individual may receive payment for research without possessing authority over investment decisions.

An organisation may participate in an event without having a contract with the Church Commissioners.

A professional may occupy positions in several organisations without those organisations sharing governance or finance.

The purpose of this section is to establish the actual relationships.

It also examines how professional appointments are authorised, how fees are determined, how conflicts of interest are identified and how external affiliations are managed.

Particular attention is given to the documentary records concerning Grant Thornton, academic researchers, Lambeth Palace Library, Dr Annabelle Gilmore, Kwesi Ochosi and Charmaine Simpson.

The investigation also addresses possible relationships with Black History Studies, Building Trust Consortium and the Global Reparations Hub.

Those relationships must be examined without presuming that financial or contractual connections exist.

20.2. Why professional appointments matter

Professional appointments can influence the development of an institutional programme.

Historical researchers may determine which records are examined.

Consultants may advise on governance.

Engagement personnel may influence which communities are approached.

Communications specialists may shape public explanations.

Investment advisers may recommend financial strategies.

Legal professionals may identify the powers and approvals required for implementation.

These functions can influence decisions even where the person performing the work does not possess final legal authority.

The investigation should therefore examine how expertise enters the decision-making process.

It should distinguish the provision of professional advice from the formal adoption of that advice.

It should also establish who approves expenditure and who evaluates completed work.

The objective is transparent institutional accountability rather than suspicion arising merely from professional participation.

20.3. The Church Commissioners as the commissioning institution

The Church Commissioners are the principal institution responsible for Project Spire.

Their Board approved the original £100 million commitment and has overseen the development of the proposed reparatory response.

The institution has acknowledged commissioning historical research and undertaking other programme-development activities.

However, it should not automatically be assumed that every professional who participated in a Church-related activity was contracted directly by the Commissioners.

Some may have been employed through Lambeth Palace Library or another Church institution.

Others may have participated through academic or organisational partnerships.

The investigation must identify the contracting party in each case.

This is necessary to determine who approved the work, who paid for it, which policies applied and who held the relevant records.

20.4. Grant Thornton's documented forensic accounting role

Grant Thornton UK LLP was commissioned to undertake forensic accounting research concerning Queen Anne's Bounty and its historical financial connections with African chattel enslavement.

The assignment involved examination of financial records, transactions and asset tracing.

The resulting research formed an important foundation for the Commissioners' subsequent institutional acknowledgement and reparatory commitment.

This is a documented professional relationship.

However, the investigation must distinguish the public research outcome from the complete contractual arrangements.

The published report does not necessarily reproduce the original procurement process, engagement letter, payment schedule or every subsequent amendment.

RNL should therefore seek confirmation of the contract's scope, duration, approval and total cost.

Primary source:

Grant Thornton — *Investigating the Church's links to slavery*:

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

20.5. The forensic accounting contract

The original forensic accounting work provides a useful starting point for constructing the contractor register.

The investigation should establish when the contract was awarded and which Church Commissioners body or officer authorised it.

It should identify the services commissioned, the initial financial value and any extensions.

It should also determine whether Grant Thornton was selected through a competitive process or another authorised procurement arrangement.

The investigation should not assume that competition was legally required without identifying the applicable rules.

Specialist historical forensic accounting may require expertise possessed by a limited number of suitable providers.

However, the responsible institution should be capable of explaining the selection process.

The objective is to establish lawful authority, value for money and appropriate management of professional services.

20.6. Published evidence concerning forensic accounting fees

In a parliamentary answer published on 6 May 2025, the Church Commissioners stated that their annual reports contain information concerning forensic accounting fees.

The response identified relevant entries in the annual accounts for 2021, 2022 and 2023, referring to specific pages.

This is an important documentary lead.

It means the investigation need not rely exclusively upon general statements concerning Project Spire expenditure.

Relevant amounts may be available within the published financial statements.

However, the complete figures must be extracted and reconciled before they are presented as confirmed contractor payments.

The investigation should determine whether the annual-report disclosures relate entirely to Project Spire or include other accounting services.

It should also establish whether later annual reports contain additional fees.

Primary parliamentary source:

https://questions-statements.parliament.uk/written-questions/detail/2025-04-22/47119/

Annual reports:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

20.7. Professional historians and academic expertise

The forensic investigation was supported by historical expertise.

Published institutional accounts identify Professor Arthur Burns of King's College London and Dr Helen Paul of the University of Southampton among those associated with the historical research.

Academic expertise may assist in interpreting financial records and assessing historical context.

However, the existence of scholarly participation does not establish that every researcher held an individual commercial contract.

A researcher may contribute through an institutional agreement, separate commission, employment arrangement or other professional relationship.

The investigation must therefore establish the nature of each appointment.

It should distinguish authorship, professional review, advisory contributions and paid consultancy.

The amounts and terms of remuneration should not be invented.

20.8. Independent academic review

The Church Commissioners' January 2026 statement refers to further academic research undertaken in 2025 and reviewed by additional historians.

This is relevant because the historical findings have attracted public scrutiny and disagreement.

Independent review may improve the quality and credibility of research.

However, the investigation should establish how reviewers were selected and what questions they were asked to examine.

It should determine whether reviewers were independent of the original research team and whether their conclusions were published.

The term *independent* should be assessed through actual professional arrangements.

A reviewer may possess appropriate expertise while also holding relevant institutional associations.

Such associations are not automatically disqualifying.

They should be declared and managed where necessary.

20.9. Lambeth Palace Library as an institutional research setting

Lambeth Palace Library is the principal archive for the documentary history of the Church of England.

Its collections contain material relevant to Church institutions, historical figures, missionary activity and the history of enslavement.

Published records connect the Library with archival research and public engagement associated with Project Spire.

However, the Library's institutional status must be distinguished from that of the Church Commissioners.

The investigation should establish whether particular researchers were employed by the Library, directly by the Commissioners or under another arrangement.

It should also identify who supervised their work and controlled the research budget.

These distinctions are necessary for accurate attribution.

A researcher working at Lambeth Palace Library should not automatically be described as a Church Commissioners employee without confirmation.

20.10. The archival research appointments

A published first-hand account by a researcher who undertook a placement at Lambeth Palace Library describes two full-time archivist and project coordinator positions associated with Project Spire.

The account identifies Dr Annabelle Gilmore and Kwesi Ochosi as researchers with whom the author worked.

It explains that their work concerned archival material relating to race and enslavement.

This is significant evidence of Project Spire-related professional activity.

However, the account does not reproduce the relevant contracts.

It does not establish precise remuneration, employment dates or reporting arrangements.

These matters must be confirmed by the responsible institution.

Published source:

A Glimpse into the Archive: My Placement at Lambeth Palace Library:

https://www.memslib.co.uk/post/a-glimpse-into-the-archive-my-placement-at-lambeth-palace-library

20.11. Dr Annabelle Gilmore

Dr Annabelle Gilmore is identified in public materials as a Project Coordinator and Archivist associated with Church-related historical research.

Charmaine Simpson's public communication concerning *Routes in the Records* described a presentation by Dr Gilmore involving the history of Esther Smith, an enslaved woman seeking religious freedom.

The first-hand Lambeth Palace Library placement account also identifies Dr Gilmore as involved in the relevant archival work.

These records support the inclusion of her professional role in the Project Spire evidence register.

However, the investigation must determine the exact terms of her appointment.

Her inclusion should not be interpreted as an allegation of wrongdoing.

The enquiry concerns institutional responsibilities, commissioning arrangements and research outputs.

20.12. Kwesi Ochosi: newly identified primary confirmation

A particularly important primary source provides stronger confirmation of Kwesi Ochosi's Project Spire role.

On 2 September 2026, the Lambeth Palace Library blog published an article authored by Kwesi Ochosi.

The article identifies him as **“Project Spire Coordinator: Archives.”**

Its subject concerns Bishop Samuel Ajayi Crowther and the historical treatment of an African bishop within the Anglican Church.

This is materially stronger evidence than an event programme listing him only as a speaker.

The role title appears in a publication hosted by the institution responsible for the relevant archives.

It establishes a publicly documented Project Spire archival coordination role.

However, it does not establish the complete contractual relationship, remuneration or authority over the proposed financial fund.

Primary source:

Lambeth Palace Library Blog — *Truth-telling in the archives: Bishop Samuel Ajayi Crowther and the work of Repair*, 2 September 2026:

https://monumentoffame.org/

Relevant article: *Truth-telling in the archives: Bishop Samuel Ajayi Crowther and the work of Repair.*

20.13. The significance of the new Kwesi Ochosi evidence

The newly identified article materially strengthens the documentary foundation of the investigation.

Earlier evidence established that Kwesi Ochosi participated in Church-related archival events.

A first-hand account associated his archival work with Project Spire.

The September 2026 article now supplies an explicit role title directly identifying him with Project Spire.

This should be incorporated into the permanent evidence register as a primary institutional record.

It also changes the status of the question concerning whether Kwesi Ochosi had a Project Spire-related role.

That role is now publicly documented.

The remaining questions concern the nature, duration, financing and institutional authority of the appointment.

The investigation must not continue describing the existence of the role as merely an unverified rumour.

Equally, it must not expand the confirmed archival role into unverified financial or governance authority.

20.14. Kwesi Ochosi's external organisational activities

Separate public records identify Kwesi Ochosi as founder of Building Trust Consortium.

The UK Reparations Conference programme identified him as chair of the Global Reparations Hub launch on 17 October 2026.

Other event materials identify him as moderator of GRH-related activities.

These records establish involvement in external reparations initiatives.

However, the existence of these activities does not establish that the Church Commissioners sponsored or directed them.

The investigation must determine whether any formal contractual, financial or governance relationship existed.

It should also establish whether relevant external activities were subject to institutional declarations or permissions.

No improper conflict should be inferred solely from multiple professional roles.

20.15. Charmaine Simpson's documented Church-related role

Published Church of England materials identify Charmaine Simpson as a Research and Engagement Coordinator associated with the Church Commissioners' examination of historical links to African chattel enslavement.

Other public material identifies her with Project Spire.

She is also publicly identified as CEO and co-founder of Black History Studies.

The official conference programme names her among the participants in the GRH launch.

These are documented professional and organisational associations.

However, the investigation must distinguish the capacity in which she acted on each occasion.

Participation in a GRH event does not automatically mean she represented the Church Commissioners.

Similarly, her Church-related research role does not establish authority over the proposed £100 million fund.

The precise responsibilities require confirmation.

20.16. Charmaine Simpson's commissioning and remuneration arrangements

The investigation should seek clarification concerning the institution responsible for Charmaine Simpson's Project Spire-related appointment.

It should establish whether the arrangement involved employment, consultancy, an organisational contract or another form of commissioning.

It should also identify the period of work, responsibilities and relevant reporting lines.

However, the investigation should not demand unrelated personal financial information.

Where remuneration forms part of Project Spire expenditure, appropriate institutional accounting information may be sufficient.

The objective is to establish financial accountability for professional services.

No particular remuneration amount has been verified.

No allegation concerning payment or procurement has been made.

20.17. Black History Studies

Black History Studies is relevant because of Charmaine Simpson's organisational role and its documented involvement in GRH-related events.

Islington Council's published information also identifies Black History Studies as a previous pop-up operator at the Black Cultural Centre.

These records demonstrate several areas of public activity.

However, the existence of those activities does not establish a financial relationship between Black History Studies and Project Spire.

The investigation should therefore seek confirmation of any contract, grant or payment involving the Church Commissioners or a relevant Project Spire budget.

If no such arrangement exists, that should be recorded.

If an arrangement exists, its scope, value and authorisation should be documented.

Professional overlap is not a substitute for financial evidence.

20.18. Building Trust Consortium

Building Trust Consortium is relevant because of Kwesi Ochosi's publicly described founding role and the organisation's participation in GRH-related events.

However, its complete legal and financial identity requires verification.

The investigation should determine whether it is an incorporated entity, a project hosted by another organisation, an informal collaboration or another institutional arrangement.

The responsible legal entity must be identified before contractual or financial responsibilities can be attributed.

The investigation should also ask whether Building Trust Consortium has undertaken any paid work for Project Spire.

No such payment has been established by the evidence examined.

The enquiry is intended to determine whether a relationship exists, not to presume one.

20.19. The Global Reparations Hub

The Global Reparations Hub is the subject of RNL's separate investigation.

Its London launch involved individuals associated with Project Spire-related work.

That overlap is documented.

However, a financial or contractual relationship between the GRH and Project Spire has not been established.

The investigation should therefore ask whether the Church Commissioners commissioned, funded, sponsored or otherwise formally supported any GRH activity.

It should also establish whether Project Spire personnel participated in GRH events in personal, professional or institutional capacities.

Where no formal relationship exists, that should be confirmed.

The investigations must remain separate unless specific evidence establishes a relationship requiring cross-reference.

20.20. The distinction between professional networks and institutional control

A professional network may include people who participate in several organisations or events.

Such networks can support collaboration and the exchange of expertise.

However, shared participants do not automatically establish shared institutional control.

For example, two organisations may invite the same researcher because that person possesses relevant expertise.

They may collaborate on a public event without combining financial resources.

They may share historical interests without holding common governance structures.

The investigation must therefore distinguish informal association from formal institutional relationships.

A formal relationship should be supported by an agreement, appointment, payment record, governing document or other appropriate evidence.

Without such evidence, the association should remain accurately described as an association.

20.21. The meaning of a conflict of interest

A conflict of interest may arise where a person's responsibilities or interests could affect the impartial performance of a particular duty.

Relevant interests may include employment, consultancy, organisational leadership, financial benefit, family relationships or other circumstances.

However, the existence of multiple professional roles is not automatically an improper conflict.

The investigation must identify the duties applicable to the person, the relevant interest and the particular decision potentially affected.

It should then establish whether the interest was declared and managed.

A potential conflict may be appropriately addressed through transparency, recusal or independent review.

The purpose of conflict-of-interest procedures is to protect decisions, not necessarily to prohibit every overlapping professional association.

20.22. Potential conflicts involving external organisations

A Project Spire adviser may also participate in an independent reparations organisation.

Such involvement may be entirely legitimate.

However, questions could arise if the external organisation subsequently sought funding, influence over appointments or access to confidential programme information.

The investigation should therefore establish whether relevant policies address these possibilities.

It should identify which decisions require declarations.

It should also determine whether persons holding external roles may participate in decisions affecting those organisations.

No such improper decision has been established.

The enquiry concerns whether the institutional safeguards are sufficiently clear.

20.23. Contractual confidentiality and public accountability

Professional contracts may contain confidentiality provisions.

Such provisions can protect legitimate commercial information, personal data and privileged material.

However, confidentiality should not automatically prevent publication of basic information concerning the use of institutional resources.

Relevant public information may include the identity of the contracting organisation, the nature of services, the value of a contract and the basis of authorisation.

The investigation should request information proportionate to the public accountability objective.

Where disclosure is restricted, the institution should explain the legal or contractual basis.

RNL should not presume that every refusal to disclose a contract constitutes concealment.

The question is whether sufficient information can be supplied to establish responsible administration.

20.24. Procurement and competition

The appointment of external professional advisers may involve competitive procurement.

However, the rules applicable to the Church Commissioners may differ from those governing central government departments.

The investigation must not automatically apply public procurement obligations to the Commissioners without establishing their legal status and the relevant transaction.

It should instead identify the institution's own procurement policies and any applicable statutory requirements.

The Commissioners should explain whether particular contracts were tendered or directly awarded.

Where direct awards were made, the reasons should be recorded.

These may include specialist expertise, continuity, urgency or other legitimate considerations.

The objective is to examine compliance and value for money rather than assume wrongdoing from the method of appointment.

20.25. Appointment criteria and professional competence

Professional appointments should be relevant to the work required.

Forensic accounting demands particular expertise.

Historical research may require specialist knowledge of archives, economic history or colonial institutions.

Community engagement may require experience of affected communities and an understanding of reparatory justice.

Investment advice requires financial competence and appropriate risk assessment.

The investigation should therefore examine whether the relevant appointment criteria were documented.

It should also establish how candidates or providers were assessed.

Professional competence and community knowledge are not necessarily competing requirements.

An effective programme may require both.

The process should make clear how each was considered.

20.26. The treatment of grassroots expertise

Independent grassroots reparations organisations may possess specialist knowledge developed through historical research, campaigning and community engagement.

Such expertise may not always be accompanied by academic titles or large institutional budgets.

The investigation should therefore examine whether Project Spire's commissioning arrangements recognise different forms of relevant expertise.

It should determine whether grassroots researchers and organisations can submit proposals or be considered for suitable work.

However, no organisation should automatically receive a contract solely because it has campaigned for reparations.

The relevant question is whether appointment processes are fair, transparent and appropriate to the work.

This is particularly important where the programme seeks to address historic inequalities.

20.27. Remuneration and equality

The investigation should establish whether remuneration policies are consistently applied.

Relevant questions may concern how fee rates are determined, how comparable work is valued and whether any unequal treatment can be identified.

However, the investigation must respect privacy and confidentiality.

Detailed individual salary information may not be necessary where aggregated financial information and policy explanations provide appropriate accountability.

The objective is to examine the fairness and authorisation of remuneration arrangements.

The existence of a paid role is not inherently improper.

Professional research and programme development may require remuneration.

The question is whether payments are authorised, proportionate, appropriately recorded and subject to relevant safeguards.

20.28. Financial authority is separate from professional remuneration

A person may receive payment for research while having no authority to allocate grants or approve investments.

This distinction is central.

Professional remuneration concerns payment for work performed.

Financial decision-making authority concerns the power to commit institutional resources.

The investigation must not treat one as proof of the other.

For example, the newly confirmed Project Spire archival role of Kwesi Ochosi establishes professional involvement.

It does not establish his authority over the £100 million fund.

Similarly, Charmaine Simpson's research and engagement role does not establish that she could authorise financial transfers.

Those powers must be verified independently.

20.29. Reporting lines and institutional supervision

Every relevant appointment should have an identifiable reporting structure.

A consultant may report to a project manager.

An employee may report to a departmental officer.

An adviser may report to a committee.

A researcher working through a partner institution may be supervised locally while contributing to a broader programme.

The investigation should therefore identify the person or body responsible for approving work and evaluating deliverables.

This matters because institutional accountability depends upon more than the identity of the individual performing the work.

The person authorising an activity may possess different responsibilities from the person carrying it out.

The distinction must be preserved.

20.30. Ownership and control of research outputs

Professional research may produce reports, databases, archival descriptions, educational materials or other intellectual outputs.

The investigation should establish who owns those outputs and who may publish or reuse them.

It should also determine whether the Church Commissioners receive all relevant research findings or only specified deliverables.

Where work concerns historically significant material relating to African chattel enslavement, public access may be an important consideration.

However, archival material may also be subject to copyright, privacy restrictions or conservation requirements.

The investigation should therefore examine the terms governing access.

The objective is to establish how commissioned research contributes to the permanent historical record.

20.31. Data protection and personal information

Professional appointment records may contain personal information.

RNL's investigation should seek institutional accountability without unnecessarily publishing private details.

Contract values paid to organisations, general appointment terms and professional responsibilities may be relevant.

Personal bank details, home addresses and unrelated employment information are not necessary to establish the programme's financial structure.

Where appropriate, records may be redacted.

The investigation should distinguish legitimate privacy protections from the need for transparency concerning public-facing institutional decisions.

This approach protects individuals while preserving the integrity of the evidence.

20.32. Independent review of appointments

An institution may adopt procedures for reviewing significant appointments.

These may include recruitment panels, procurement committees, conflicts registers or independent assessment.

The investigation should determine which procedures applied to Project Spire.

It should also establish whether complaints concerning appointments can be considered by persons independent of the original decision.

The existence of an appointment does not establish that it was properly or improperly made.

The relevant evidence includes the criteria, decision record, authorisation and any declared interests.

The purpose is procedural accountability.

20.33. Racial-justice safeguards in commissioning

RNL seeks documentary evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism in the selection and supervision of Project Spire personnel.

Relevant questions concern access to professional opportunities, transparent criteria, fair remuneration, conflict management and complaints.

The investigation should establish whether those safeguards are contained in Church-wide policies, Project Spire-specific procedures or the contractual terms of external organisations.

It should also determine whether the institution assesses the actual operation of these protections.

RNL makes no accusation that a particular appointment was racially discriminatory.

The enquiry concerns the existence and effectiveness of safeguards.

20.34. The danger of assuming wrongdoing from personal association

The investigation has identified several individuals participating in multiple reparations-related settings.

These associations are legitimate subjects for documentary examination.

However, a person should not be treated as suspect merely because they know another individual, attend the same event or belong to more than one organisation.

The relevant questions concern authority, financial relationships, applicable duties and identifiable decisions.

Where no connection beyond public participation is established, that limitation must be stated.

Where a formal relationship is confirmed, its significance should be assessed according to the documents.

The investigation must remain evidence-led.

20.35. The danger of overlooking genuine institutional overlap

The need to avoid unsupported accusations does not justify disregarding documented connections.

For example, Kwesi Ochosi's Project Spire archival role is now supported by a primary publication from Lambeth Palace Library.

His separate GRH launch role is also publicly documented.

These are real associations.

They justify asking whether any professional declarations or institutional permissions were relevant.

They also justify seeking clarification concerning contractual boundaries.

The investigation must neither exaggerate nor minimise those facts.

The objective is accurate institutional understanding.

20.36. The possibility of institutional capture

A reparatory programme may seek expert advice from a limited number of professional or organisational networks.

Such arrangements can be efficient and may reflect legitimate expertise.

However, excessive dependence upon a narrow network can create possible governance risks.

These may include limited access for independent organisations, insufficient scrutiny of appointments or concentration of influence.

The investigation should therefore examine whether Project Spire's commissioning processes are appropriately open.

However, the existence of recurring names does not establish institutional capture.

Such a conclusion would require evidence concerning the appointment process, control of decisions and exclusion of alternatives.

The present enquiry concerns whether safeguards exist to prevent inappropriate concentration of influence.

20.37. The importance of a complete appointments register

RNL should maintain a permanent register of professional appointments associated with Project Spire.

The register should identify the relevant person or organisation, role, commissioning institution, dates, general financial arrangement and documentary source.

It should also distinguish employment from consultancy, voluntary participation and independent advisory activity.

Where the information is not known, the entry should state *unverified*.

The register should not fill gaps through inference.

Changes in roles should be recorded chronologically.

This will permit researchers to understand how the programme developed and how responsibilities changed over time.

20.38. The importance of a contract register

A separate contract register should identify each relevant agreement.

The record should include the contracting parties, purpose, commencement date, duration, approved value, amendments and reporting obligations.

Where contract values are unavailable, the register should record the information as outstanding.

Where a contract is not confirmed, the register should not describe it as existing.

The distinction between a professional appointment and a verified contract is essential.

A person may hold a role through an employment arrangement rather than a consultancy contract.

The register must preserve the actual legal relationship.

20.39. The importance of a declarations register

A declarations register should identify relevant interests disclosed by persons participating in decisions.

However, access to such information may be subject to privacy and governance restrictions.

The investigation should therefore seek confirmation of the existence and operation of an appropriate system.

It should establish whether relevant external affiliations were considered in relation to particular decisions.

It should also ask whether declarations resulted in recusal or other safeguards where necessary.

The purpose is to understand the process.

The investigation should not assume that an undeclared interest exists merely because a public record reveals an external role.

The applicable declaration duty must first be established.

20.40. The relationship between contracts and financial delivery

The payment of professional fees may be necessary to develop Project Spire.

However, such payments are not necessarily reparatory transfers to affected communities.

The investigation should therefore classify expenditures correctly.

A contract for forensic accounting is research expenditure.

A fee for governance advice is programme-development expenditure.

An investment in a business may be a financial asset held by the fund.

A non-repayable grant to an eligible community organisation is a different category of financial delivery.

These distinctions are necessary to prevent the costs of preparing a reparatory programme from being confused with the programme's eventual benefits.

20.41. Financial transparency and peaceful conflict prevention

Reparatory justice concerns historical suffering and potentially substantial financial resources.

Questions concerning who receives contracts, who controls decisions and who may benefit from future funding can generate understandable public interest.

Where information is unavailable, speculation may arise.

RNL considers transparent appointment and procurement procedures essential preventative safeguards.

The possibility of serious disputes escalating into intimidation, threats of violence or physical confrontation should be recognised as a matter for peaceful conflict prevention.

This does not establish that any such threat has occurred.

It does not attribute violent intentions to any named individual or organisation.

The objective is to reduce avoidable mistrust through reliable documentation, fair procedures and timely explanations.

20.42. Priority questions concerning professional commissioning

Question 20.1: Which Church Commissioners body or officer possesses authority to commission Project Spire professional services?

Question 20.2: What procurement or appointment policies apply?

Question 20.3: How were the relevant professional requirements identified?

Question 20.4: What selection criteria were used?

Question 20.5: Which appointments were made through competitive processes?

Question 20.6: Which were made through direct appointment?

Question 20.7: What reasons supported any direct appointments?

Question 20.8: What records establish formal approval?

Question 20.9: How are appointment decisions reviewed?

Question 20.10: Will the Commissioners publish a consolidated register of relevant professional appointments and contracts?

20.43. Priority questions concerning Grant Thornton and academic research

Question 20.11: When was Grant Thornton originally commissioned?

Question 20.12: What services were included in the original engagement?

Question 20.13: What was the initial contract value?

Question 20.14: Were contract extensions or amendments approved?

Question 20.15: What total fees were paid?

Question 20.16: How do those amounts reconcile with the figures disclosed in the Commissioners' annual accounts?

Question 20.17: Which historians and academic institutions were formally commissioned?

Question 20.18: What were their responsibilities and financial arrangements?

Question 20.19: What independent peer review was commissioned?

Question 20.20: What public access is available to the resulting research and review documents?

20.44. Priority questions concerning Lambeth Palace Library

Question 20.21: Which institution authorised the relevant Project Spire archival research appointments?

Question 20.22: Were the appointments made directly by Lambeth Palace Library, the Church Commissioners or another organisation?

Question 20.23: What were the terms and dates of the archival research programme?

Question 20.24: What budget supported the programme?

Question 20.25: What were the responsibilities assigned to Dr Annabelle Gilmore?

Question 20.26: What were the responsibilities assigned to Kwesi Ochosi?

Question 20.27: What did the title “Project Spire Coordinator: Archives” authorise Kwesi Ochosi to do?

Question 20.28: What reporting and supervisory arrangements applied?

Question 20.29: What research outputs were produced?

Question 20.30: What procedures govern the publication and preservation of those outputs?

20.45. Priority questions concerning Charmaine Simpson

Question 20.31: What was Charmaine Simpson's precise Project Spire-related role?

Question 20.32: Which institution employed or commissioned her?

Question 20.33: What were the appointment dates?

Question 20.34: What research and engagement responsibilities were assigned?

Question 20.35: What financial or budgetary authority, if any, accompanied the role?

Question 20.36: What reporting arrangements applied?

Question 20.37: Was any work undertaken through Black History Studies rather than an individual appointment?

Question 20.38: If so, what contractual or financial arrangement applied?

Question 20.39: What institutional policies governed external professional activities?

Question 20.40: Can the Commissioners provide written clarification of the capacity in which she participated in separate GRH events?

20.46. Priority questions concerning Kwesi Ochosi

Question 20.41: What were the formal terms of Kwesi Ochosi's Project Spire archival appointment?

Question 20.42: Which institution was responsible for the appointment?

Question 20.43: What were its commencement and completion dates?

Question 20.44: Was the position salaried, contracted or otherwise remunerated?

Question 20.45: What general budget supported the role?

Question 20.46: Did the role involve authority over research procurement, staff or other expenditure?

Question 20.47: Did it involve any authority over the proposed £100 million fund?

Question 20.48: What procedures governed external organisational affiliations?

Question 20.49: Did the Church Commissioners have any formal role in his GRH activities?

Question 20.50: Can the relevant institutions clarify the boundaries between his Project Spire and Building Trust Consortium responsibilities?

20.47. Priority questions concerning external organisations

Question 20.51: Has Black History Studies held any contract with Project Spire or the Church Commissioners concerning the relevant programme?

Question 20.52: If so, what were the purpose, dates and value?

Question 20.53: Has Building Trust Consortium held any such contract?

Question 20.54: If so, what were its purpose, dates and value?

Question 20.55: Has the Global Reparations Hub received Project Spire funding or sponsorship?

Question 20.56: Did any Project Spire budget support the GRH launch on 17 October 2026?

Question 20.57: What external organisations have received research, engagement or consultancy contracts under Project Spire?

Question 20.58: What procedures distinguish institutional partnerships from informal professional associations?

Question 20.59: How are relevant financial relationships disclosed?

Question 20.60: Will the Commissioners confirm in writing where no formal financial relationship exists?

20.48. Priority questions concerning conflicts and safeguards

Question 20.61: What conflict-of-interest policy applies to Project Spire staff, contractors and advisers?

Question 20.62: What external interests must be declared?

Question 20.63: How are declarations reviewed?

Question 20.64: When is recusal required?

Question 20.65: What safeguards apply where a professional has roles in several reparations organisations?

Question 20.66: How are supplier-selection decisions protected from inappropriate influence?

Question 20.67: What safeguards exist against the possibility of anti-Black racism and Institutional Racism in professional appointments?

Question 20.68: What complaints procedure applies to disputed appointments or contracts?

Question 20.69: What independent review arrangements are available?

Question 20.70: Will the Commissioners publish a clear institutional explanation of how relevant conflicts are identified and managed?

20.49. Preliminary evidential findings

The Church Commissioners commissioned professional forensic accounting research concerning the historical origins of Queen Anne's Bounty's financial resources.

Grant Thornton's involvement is documented.

Academic historians also contributed to the research and its subsequent examination.

Parliamentary records identify forensic accounting expenditure disclosed through the Commissioners' annual accounts.

The Commissioners separately confirmed that approximately £1 million had been spent on Project Spire-related work from 2019 through December 2024, excluding internal staff time.

Published materials identify professional archival research activities at Lambeth Palace Library involving Dr Annabelle Gilmore and Kwesi Ochosi.

A primary Lambeth Palace Library publication dated 2 September 2026 explicitly identifies Kwesi Ochosi as **Project Spire Coordinator: Archives**.

Published Church-related materials also identify Charmaine Simpson in a research and engagement role.

Separate records establish Charmaine Simpson's leadership of Black History Studies and Kwesi Ochosi's public association with Building Trust Consortium.

Both were involved in GRH-related activities.

These are documentary findings.

However, the available evidence does not establish the complete terms or values of their relevant appointments.

It does not establish that either person exercised financial authority over the proposed £100 million fund.

It does not establish financial transfers between Project Spire and the GRH.

It also does not establish that any particular professional appointment was improper.

The outstanding questions concern contractual arrangements, procurement, financial accounting, institutional authority, external affiliations and safeguards.

20.50. Conclusion: documented professional involvement must be distinguished from financial or institutional control

Project Spire has relied upon professional expertise across several fields.

The documented work includes forensic accounting, historical research, archival investigation, public engagement and governance development.

Such activities may be necessary to establish an informed and legally sound reparatory response.

However, their legitimacy must be supported by transparent authorisation, appropriate procurement, proportionate expenditure and clear accountability.

The investigation has identified important professional and organisational connections.

The most significant new documentary development is the Lambeth Palace Library publication explicitly identifying Kwesi Ochosi as Project Spire Coordinator: Archives.

This establishes a direct and publicly documented role that strengthens earlier findings.

It also provides a more precise basis for seeking clarification.

However, an archival coordination role is not equivalent to control over a proposed £100 million reparatory fund.

Similarly, Charmaine Simpson's research and engagement role does not automatically establish authority over financial allocations.

The participation of either individual in GRH-related activities does not, without further evidence, establish that Project Spire financed or directed those activities.

The central conclusion of Section 20 is that Project Spire's professional research and engagement networks are partly documented, including specific named personnel and institutions, but the complete appointment, contracting, remuneration, procurement, declarations and financial-authority records remain to be established.

RNL will continue to pursue those records without making unsupported accusations or allegations.

The investigation will distinguish confirmed employment or commissioning arrangements from public associations.

It will distinguish professional payment from financial decision-making authority.

It will distinguish a potential conflict of interest from a demonstrated improper decision.

It will also seek evidence of effective safeguards against anti-Black racism and Institutional Racism.

The objective is a permanent, transparent and independently reviewable account of the people and organisations responsible for developing Project Spire, the financial resources involved and the protections governing their work.

SECTION 20 — PROFESSIONAL APPOINTMENTS AND CONTRACTS EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-20-001	Grant Thornton forensic accounting work	Documented professional commission
SPIRE-20-002	Historical academic input	Documented institutional research
SPIRE-20-003	Further research and academic review during 2025	Commissioners' published statement

SPIRE-20-004	Forensic accounting fees referenced in annual accounts	Parliamentary confirmation; figures require extraction
SPIRE-20-005	Approximately £1 million expenditure through December 2024	Official aggregate figure
SPIRE-20-006	Lambeth Palace Library Project Spire archival work	Published institutional and first-hand accounts
SPIRE-20-007	Dr Annabelle Gilmore identified as Project Coordinator and Archivist	Published professional description
SPIRE-20-008	Kwesi Ochosi identified as Project Spire Coordinator: Archives	Primary Lambeth Palace Library publication, September 2026
SPIRE-20-009	Charmaine Simpson identified in Church Commissioners research and engagement role	Published professional description
SPIRE-20-010	Charmaine Simpson's association with Black History Studies	Publicly documented
SPIRE-20-011	Kwesi Ochosi's association with Building Trust Consortium	Publicly documented
SPIRE-20-012	Both individuals' participation in GRH-related activities	Published event records
SPIRE-20-013	Complete forensic accounting contract value	Extraction and reconciliation required
SPIRE-20-014	Complete research appointment terms and dates	Further confirmation required
SPIRE-20-015	Remuneration and funding source for named archival roles	Not established
SPIRE-20-016	Full Project Spire professional-services register	Outstanding
SPIRE-20-017	Procurement criteria and approvals	Further verification required
SPIRE-20-018	Relevant external-interest declarations	Not established

SPIRE-20-019	Financial authority over the proposed £100 million held by named research personnel	Not established
SPIRE-20-020	Formal financial relationship with GRH	Not established
SPIRE-20-021	Anti-racism and Institutional Racism safeguards in appointments	Further verification required
SPIRE-20-022	Independent review of professional appointments and conflicts	Further verification required

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SOURCES AND INDEPENDENT VERIFICATION

Source 20.1 — Church Commissioners, parliamentary answer, 30 August 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

Evidence: Approximately £1 million expenditure through December 2024 and categories of professional and programme-development work.

Source 20.2 — Church Commissioners, parliamentary answer, 6 May 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-04-22/47119/

Evidence: Forensic accounting fee disclosures within the Commissioners' annual reports.

Source 20.3 — Church Commissioners' annual reports and publications

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

Evidence: Published financial records requiring detailed extraction and reconciliation.

Source 20.4 — Grant Thornton

Investigating the Church's links to slavery.

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

Evidence: Forensic accounting role and description of historical research.

Source 20.5 — Church Commissioners, 19 January 2026

Response to Parliamentarians' Letter Regarding the Fund for Healing, Justice and Repair.

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Evidence: Historical research, further academic work and institutional explanation of Project Spire.

Source 20.6 — Lambeth Palace Library Blog, 2 September 2026

Truth-telling in the archives: Bishop Samuel Ajayi Crowther and the work of Repair.

https://monumentoffame.org/

Evidence: Article authored by Kwesi Ochosi identifying him as Project Spire Coordinator: Archives.

Source 20.7 — Lambeth Palace Library research placement account

A Glimpse into the Archive: My Placement at Lambeth Palace Library.

https://www.memslib.co.uk/post/a-glimpse-into-the-archive-my-placement-at-lambeth-palace-library

Evidence: Description of archival appointments and research involving Dr Annabelle Gilmore and Kwesi Ochosi.

Source 20.8 — Charmaine Simpson public communication

https://www.linkedin.com/posts/blackhistorystudies_lambethpalacelibrary-churchofengland-churchcommissioners-activity-7399945016523145216-SAcQ

Evidence: Description of Dr Annabelle Gilmore and Kwesi Ochosi as Project Coordinators and Archivists.

Source 20.9 — Church of England: Libraries and archives

https://www.churchofengland.org/about/libraries-and-archives

Evidence: Lambeth Palace Library's institutional role and archival responsibilities.

Source 20.10 — Diocese of Southwark programme, February 2026

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

Evidence: Published description of Charmaine Simpson's research and engagement role.

Source 20.11 — UK Reparations Conference 2026 agenda

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Evidence: Separate GRH participation by Charmaine Simpson and Kwesi Ochosi.

Source 20.12 — Church Commissioners' implementation update, March 2025

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

Evidence: Programme workstreams, professional activity and institutional implementation.

Source 20.13 — Church Commissioners' related documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Evidence: Historical research documents, Oversight Group information and programme materials.

END OF SECTION 20 — PROFESSIONAL APPOINTMENTS, CONTRACTORS, CONSULTANTS AND INSTITUTIONAL NETWORKS: COMMISSIONING, REMUNERATION, PROCUREMENT, EXTERNAL AFFILIATIONS, DECLARATIONS AND ACCOUNTABILITY

NEXT: SECTION 21 OF 24 — PUBLIC COMMUNICATIONS, INSTITUTIONAL TRANSPARENCY, ACCESS TO INFORMATION, RESPONSE TIMES, DOCUMENT PRESERVATION, CORRECTIONS AND THE RIGHT TO RECEIVE CLEAR WRITTEN ANSWERS.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 21 OF 24

PUBLIC COMMUNICATIONS, INSTITUTIONAL TRANSPARENCY, ACCESS TO INFORMATION, RESPONSE TIMES, DOCUMENT PRESERVATION, CORRECTIONS AND THE RIGHT TO RECEIVE CLEAR WRITTEN ANSWERS

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Official public information channels, published research, consultation documents and parliamentary responses identified. The completeness, consistency, timeliness and effectiveness of communications, together with outstanding documentary disclosures, remain under investigation.

21.1. Purpose of this section

This section examines the arrangements through which the Church Commissioners for England communicate with the public about Project Spire and the proposed Fund for Healing, Repair and Justice.

The investigation considers the accessibility of information, availability of supporting documents, accuracy of institutional statements, procedures for answering questions, treatment of corrections and preservation of records.

It also examines whether affected Black/Afrikan communities and independent grassroots reparations organisations can obtain clear written answers to legitimate questions concerning the programme.

These matters are especially important because Project Spire involves historical institutional responsibility, substantial proposed financial resources, ongoing legal and regulatory processes, community engagement and the possibility of differing public interpretations.

The original £100 million commitment was announced in January 2023.

Subsequent developments included an independent Oversight Group, publication of recommendations, further research, implementation workstreams and parliamentary questioning.

However, the proposed fund is still described by the Church Commissioners' official public information as not operational.

This creates a continuing requirement for accurate explanations.

RNL considers that transparency must extend beyond the publication of broad institutional intentions.

An accountable programme should be able to explain what decisions have been made, what remains outstanding, who is responsible and what supporting evidence can be inspected.

The purpose of this section is to examine whether the existing communication arrangements meet those requirements.

21.2. Transparency as a continuing institutional responsibility

Transparency should not be treated as a single event.

The publication of a research report may explain the historical evidence.

A press release may announce an institutional decision.

A public consultation may collect opinions.

A parliamentary response may clarify a disputed issue.

However, these are different forms of communication serving different purposes.

A substantial institutional programme requires a means of keeping the public informed as circumstances change.

The information should distinguish past decisions from current arrangements and future intentions.

It should also distinguish confirmed actions from proposed activities.

Where earlier statements become outdated, the institution should identify the change.

RNL's investigation therefore seeks both the original historical record and a current explanation of the programme's status.

21.3. The Church Commissioners' public information structure

The Church Commissioners maintain a dedicated group of webpages concerning their historical links to African chattel enslavement.

These include introductory information, historical findings, institutional responses, frequently asked questions, related documents and a feedback mechanism.

This structure provides an identifiable public source of information.

The research and related documents can be accessed without requiring members of the public to rely exclusively upon informal discussions.

This is a significant positive feature.

However, the existence of a public information website does not establish that every important question has been answered.

The investigation should assess the content, completeness, accessibility and updating of the published material.

It should also determine whether the information permits readers to identify the latest institutional position without confusion.

Official information hub:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/church-commissioners-links-african-chattel-enslavement

21.4. The publication of historical research

The Commissioners published an interim account of their historical research in 2022 and a fuller report in January 2023.

These documents identify the historical financial connections involving Queen Anne's Bounty, South Sea Company securities and benefactions potentially associated with African chattel enslavement.

Their publication provides a substantial foundation for public examination.

However, RNL should distinguish access to the researchers' conclusions from access to every underlying historical record.

A research report may cite archives, financial ledgers and other sources without reproducing every document.

Independent researchers may therefore need additional archival access to verify particular findings.

The investigation should establish how the original sources can be inspected.

It should also record any practical limitations involving remote access, registration, copying, search facilities or other conditions.

The purpose is to make historical evidence as accessible and independently verifiable as reasonably possible.

21.5. The related-documents collection

The Church Commissioners' related-documents page contains important supporting material.

It includes the interim and full research reports, General Synod documents, speeches, Oversight Group terms of reference, questionnaire analysis and recommendations.

It also contains material addressing criticisms of the historical research, including independent responses and an explanatory publication described as a *Mythbuster*.

The availability of this material is relevant to institutional transparency.

It permits readers to examine more than the original announcement.

However, the investigation should determine whether the documents are individually dated, version-controlled and linked clearly to the decisions they support.

The institution should also explain whether additional material exists but has not been published.

Official source:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

21.6. Publication does not automatically establish completeness

The Church Commissioners have published substantial material.

RNL should recognise that fact accurately.

However, the existence of multiple documents does not establish that the public possesses a complete account of the programme.

Important outstanding questions concern the current legal structure, regulatory applications, detailed expenditure, professional contracts, delegated financial authority and verified reparatory delivery.

Some relevant information may exist in internal records.

Other information may not yet have been produced because the proposed fund remains under development.

The investigation must distinguish those possibilities.

It should not presume that unavailable material has been deliberately concealed.

Equally, the absence of publicly accessible information may justify a request for clarification.

21.7. The Frequently Asked Questions

The Commissioners maintain a substantial Frequently Asked Questions page.

It addresses historical findings, the proposed financial response, consultation, legal concerns and implementation.

The page also includes responses to criticisms of the programme.

This is useful because it provides public answers to recurring questions.

However, the investigation must consider whether answers are sufficiently precise.

For example, an answer may explain the Commissioners' intention while leaving the date of a regulatory application unresolved.

A statement describing programme development may not identify the current legal or financial position.

The institution should therefore distinguish explanations of policy from statements of completed action.

Where a response is date-sensitive, its relevant reporting date should be apparent.

Official source:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

21.8. The importance of dating regulatory statements

The legal status of Project Spire has developed over several years.

Parliamentary answers recorded informal discussions with the Charity Commission, proposed applications, trustee consideration and plans to establish a new charity.

The Commissioners' FAQ has also described the status of applications.

However, a statement published before a later regulatory development may become outdated.

RNL should therefore distinguish the date on which a statement was made from the date on which it was subsequently consulted.

This is particularly important for questions about whether applications have been submitted, whether approval has been granted and whether money has been transferred.

The investigation should request a dated regulatory chronology.

Each material development should be accompanied by the relevant document or decision reference.

A continuously updated public chronology would reduce the possibility of confusion.

21.9. The difference between an announcement and a status update

An announcement ordinarily communicates an intention or decision at a particular time.

A status update explains progress since that announcement.

The January 2023 £100 million announcement remains an important historical document.

However, it cannot alone establish the financial position in October 2026.

Similarly, the publication of the Oversight Group's recommendations in March 2024 does not establish that every recommendation has been implemented.

An effective public communication system should identify what has changed.

It should distinguish recommendations accepted in principle from measures implemented in practice.

It should also identify outstanding work and reasons for significant delay.

RNL seeks that level of specificity.

21.10. The official invitation to ask questions

The Church Commissioners maintain a page titled *Tell us what you think*.

The page invites questions concerning the historical research, institutional response and personal experiences connected with the legacy of enslavement.

It states that enquiries will be read with care.

The Commissioners indicate that they may respond directly or address questions through future updates to the FAQ.

This provides an identifiable route for public engagement.

The page is important because it expressly recognises that people may have practical, historical or personally significant questions.

However, an invitation to submit questions is not equivalent to a commitment to answer every question individually.

The investigation should establish how enquiries are handled and how unresolved questions are recorded.

21.11. The published 30-working-day response aim

The same official page states that, because of a high volume of enquiries, the Commissioners aim to respond within 30 working days.

This is a material published service standard.

It gives correspondents an indication of the expected response period.

However, the wording describes an aim, not an absolute statutory deadline.

RNL should therefore distinguish the published service target from any legal obligation that may apply to a particular type of request.

The investigation should also establish whether the response period begins upon receipt, acknowledgement or another clearly defined event.

Where a substantive response cannot be provided within the target period, the institution should explain whether an interim response or revised timetable is available.

Official source:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

21.12. The difference between acknowledgement and an answer

An acknowledgement confirms that correspondence has been received.

It does not necessarily answer the questions contained in the correspondence.

Likewise, an automated response may provide useful administrative information without addressing the substance of an enquiry.

RNL should therefore distinguish receipt, acknowledgement, referral, partial response and substantive answer.

This distinction is particularly important where a communication contains multiple detailed questions.

An institution may address one issue while leaving others unanswered.

The investigation should maintain a question-by-question response register.

Each question should be marked according to whether it has been answered completely, answered partly, referred elsewhere, declined with reasons or remains outstanding.

The objective is to avoid unnecessary repetition and prevent questions from disappearing within lengthy correspondence.

21.13. The importance of clear written answers

RNL prefers written responses because they preserve the exact meaning of questions and answers.

Written communication allows institutional positions to be checked against supporting documents.

It also permits later correction where a misunderstanding is identified.

This is particularly important for questions concerning financial amounts, legal authority, professional roles, governance and safeguards against anti-Black racism and Institutional Racism.

An oral conversation may help explain background information.

However, an informal recollection of that conversation is a weaker record than a dated written statement issued by an authorised person.

RNL should therefore seek substantive written answers to its principal investigative questions.

The purpose is not to reject discussion in all circumstances.

It is to ensure that the permanent record is accurate.

21.14. The right to preserve the questioner's intended meaning

Institutional correspondence may become confused where a question is reformulated into a different proposition.

For example, asking whether an organisation recognises the possibility of racial bias is not equivalent to alleging that a named person committed racial discrimination.

Asking whether a financial transfer occurred is not equivalent to alleging that funds were misappropriated.

Asking whether a person possessed institutional authority is not equivalent to asserting that the person acted improperly.

The precise meaning matters.

RNL requires respondents to address the actual question presented.

Where clarification is necessary, the respondent should explain what remains unclear rather than substitute a stronger or different statement.

This principle also governs RNL's own reporting.

The investigation must preserve the distinction between observations, questions, possibilities, suspicions, allegations and proven findings.

21.15. A no-drift communication standard

The investigation should adopt a clear standard against unnecessary changes in meaning.

Questions should be reproduced accurately.

Words expressing uncertainty should be preserved.

Terms such as *possible*, *appears*, *suspect*, *reported*, *unverified* and *not established* should not be silently removed.

Similarly, a response that addresses a different question should not be treated as a complete answer merely because it discusses the same broad subject.

This standard protects both the investigator and the respondent.

It prevents a genuine request for safeguards from being transformed into an accusation.

It also prevents a limited institutional clarification from being exaggerated into a conclusion resolving matters the institution has not addressed.

Accuracy of meaning is part of documentary integrity.

21.16. The importance of identifying the responsible institution

Project Spire involves multiple institutions and professional functions.

Questions concerning the Commissioners' endowment should ordinarily be addressed to the Church Commissioners.

Questions concerning Charity Commission decisions may require information from the regulator.

Questions concerning Lambeth Palace Library appointments may involve the Library's responsible administrators.

Questions concerning separate GRH activities may require responses from its organisers.

These responsibilities should not be conflated.

A person should not be assumed to speak for every organisation in which they participate.

The investigation should identify the appropriate institutional respondent for each question.

Where an organisation receives a question outside its responsibility, it should be invited to identify the correct authority where possible.

21.17. The need for named or identifiable accountability

A written response should make clear which institution issued it.

Where practical, it should identify the responsible department, officer or authorised role.

This allows the investigator to distinguish an official statement from a personal opinion or an informal comment.

However, a response need not disclose unrelated personal information.

A departmental signature or official institutional contact may be sufficient.

The important matter is that responsibility for the answer can be established.

The investigation should not presume that a response from one employee represents the entire institution unless the circumstances support that interpretation.

21.18. The distinction between public enquiries and statutory information requests

A general enquiry asks an institution to explain its position or supply information.

A statutory information request may engage specific legal duties where the relevant law applies.

These are not necessarily the same process.

The Freedom of Information Act 2000 applies to public authorities within its statutory scope.

The Environmental Information Regulations 2004 apply to qualifying environmental information held by relevant bodies.

The UK General Data Protection Regulation provides separate rights concerning personal data, subject to its applicable conditions.

RNL should not assume that every organisation associated with the Church is subject to the Freedom of Information Act simply because it performs public-facing activities.

The legal status of the specific institution and the requested information must first be established.

Where statutory access rights do not apply, a voluntary request for transparency may nevertheless be appropriate.

21.19. Freedom of Information Act considerations

The Information Commissioner's Office explains that statutory information rights depend upon whether the recipient is a public authority covered by the relevant legislation.

The Church Commissioners' particular status must therefore be examined before a Freedom of Information request is characterised as legally enforceable.

The investigation should not label correspondence as a statutory FOI request without establishing the applicable legal basis.

However, publicly available information, parliamentary scrutiny and direct institutional enquiries provide other routes for obtaining records.

Where a statutory request is appropriate, the request should be directed to the correct body.

Where the request is voluntary, the letter should make that distinction clear.

This prevents avoidable disputes concerning jurisdiction and deadlines.

Information Commissioner's Office:

https://ico.org.uk/for-the-public/official-information/

21.20. Parliamentary questions as an information source

Parliamentary questions have produced important information concerning Project Spire.

The published answers have addressed expenditure, the proposed legal route, regulatory applications, the £100 million commitment and the distinction between funding intentions and actual transfers.

These answers are especially valuable because they are dated and attributable to an official parliamentary process.

However, they may address only the specific question submitted.

An answer about expenditure through December 2024 should not be treated as a complete financial report through October 2026.

Similarly, an answer describing the regulatory position in April 2026 may not establish every development occurring afterwards.

The investigation should therefore retain each answer with its question, date and scope.

Where subsequent statements appear inconsistent, the chronology should be examined before alleging contradiction.

21.21. Public statements concerning legal authorisation

The Commissioners have described their discussions with the Charity Commission and the proposed steps for establishing a new fund.

These statements have changed as the programme developed.

The investigation should assemble all material legal-status statements in chronological order.

It should identify the difference between internal trustee approval, preparation of an application, submission to the regulator, approval by the regulator and a completed financial transfer.

Each is a separate event.

The public should be able to understand which stage has been reached.

A statement announcing a proposed fund should not be interpreted as evidence that the fund is already authorised and operating.

This issue has been examined in Section 15 and must remain consistent throughout the final report.

21.22. Public statements concerning the £100 million

The original £100 million commitment is widely associated with Project Spire.

However, the existence of the commitment must not be confused with completed reparatory delivery.

The investigation should assess how consistently this distinction appears in public communications.

Where the Commissioners describe their commitment as funding for a proposed programme, that wording should be preserved.

Where media reports imply that £100 million has already been paid to beneficiaries, the claim should be checked against financial records.

RNL should also avoid presenting the proposed £1 billion ambition as secured funding.

Accurate financial language is necessary to protect community understanding.

21.23. Communication of delays and outstanding milestones

The fund remains described in official public information as being in an implementation phase and not operational.

The original commitment dates from January 2023.

The interval between those dates creates a legitimate need for progress reporting.

The investigation should seek a published schedule of milestones.

This should identify the intended legal and regulatory steps, governance appointments, financial transfers, investment arrangements and grant-making preparations.

Where dates change, the reasons should be explained.

Not every delay establishes poor administration.

However, prolonged uncertainty without adequate communication may create avoidable confusion.

The relevant question is whether the institution supplies clear and timely explanations of material developments.

21.24. The meaning of an operational fund

The expression *operational* should have a precise meaning.

It may involve completed registration, authorised receipt of assets, functioning governance, approved financial procedures and the ability to undertake investments or grants.

However, these elements may not all become effective simultaneously.

The investigation should therefore ask the Commissioners to define what they mean when stating that the fund is not yet operational.

It should also establish which necessary steps have been completed.

A fund may possess a legal identity while not yet accepting applications.

It may have trustees while not yet holding the promised capital.

The public communication should distinguish those stages.

21.25. Access to contracts and professional appointment information

Section 20 examined professional appointments and contractors.

The present section addresses the accessibility of the supporting information.

Relevant records may include appointment dates, contracting institutions, terms of reference, authorised budgets and organisational responsibilities.

Such information may be necessary to clarify documented overlapping professional activities.

However, the investigation should distinguish legitimate institutional accountability from the disclosure of private employment information.

Where complete contracts cannot be published, the institution may be able to provide an appropriate summary or redacted record.

The objective is to establish who commissioned what work, through which institution and under what authority.

It is not to obtain unrelated personal information.

21.26. Communication concerning overlapping professional roles

Earlier sections established that Charmaine Simpson and Kwesi Ochosi held publicly documented roles relevant to Project Spire-related research or archival activity.

Both also participated in GRH-related events.

The investigation should seek clear written confirmation of the institutional capacities in which the relevant activities were undertaken.

This would help prevent confusion about whether a person was acting personally, on behalf of a private organisation or under Church Commissioners authority.

However, the existence of overlapping roles does not establish common governance or finance.

The purpose of the enquiry is clarification.

A clear institutional response could assist both the individuals concerned and the community seeking accurate information.

21.27. The relationship with the separate GRH investigation

RNL's Global Reparations Hub investigation is a separate project.

The Black Cultural Centre enquiry is also a distinct line of investigation.

These projects may share relevant individuals, events or documents.

However, their findings must not be merged without a documented connection.

The present Project Spire report should record only those communications directly relevant to Project Spire's personnel, governance, funding or institutional responsibilities.

Questions concerning the GRH's own membership, organisational authority and consultation should remain within the separate GRH investigation.

Where a cross-reference is necessary, the exact evidence should be identified.

This protects the integrity of both investigations.

21.28. The importance of original documents

A document may be circulated through email, social media, a website or a third-party archive.

However, a reproduction may omit context.

An email screenshot may not display the complete recipient list or message headers.

An event advertisement may have been edited after publication.

A webpage may be updated without retaining the earlier wording.

The investigation should therefore preserve original documents wherever possible.

Where only a screenshot or secondary copy is available, that limitation should be recorded.

The evidential status should reflect what is actually held.

A secondary report should not automatically be treated as the original institutional record.

21.29. Website changes and version history

Project Spire's official webpages may change as the fund develops.

Such updates can be useful.

However, the investigation should be able to determine what information was publicly available at a particular time.

RNL should therefore preserve dated copies of materially relevant pages.

These include the FAQs, operational-status page, related-documents collection and implementation announcements.

Where a material change occurs, the investigation should compare the original and revised wording.

A change is not automatically evidence of concealment.

It may represent correction, clarification or genuine progress.

The purpose is to establish an accurate chronology.

21.30. Corrections and the public record

Institutions sometimes publish inaccurate or incomplete information.

The existence of an error does not automatically establish that it was deliberate.

However, a transparent organisation should provide a means of correcting material inaccuracies.

The investigation should establish whether Project Spire maintains a corrections policy.

It should determine whether corrections are dated and whether previous versions remain accessible.

Where a statement concerns an individual or organisation, the affected party should be able to submit documentary evidence supporting a correction.

RNL should apply the same principles to its own publications.

Corrections should not silently erase the historical record.

21.31. Corrections concerning personal and organisational roles

The Project Spire investigation has identified professional appointments and public affiliations.

The precise capacity in which individuals acted is important.

A person may be described as a project coordinator, archivist, adviser, speaker or organisational founder.

These roles have different meanings.

Where an institution supplies authoritative clarification, the investigation should update the relevant entry.

However, the original publication should remain available as part of the historical record.

The correction should explain what changed and why.

This approach prevents inaccurate assumptions while preserving transparency.

21.32. Corrections concerning financial information

Financial figures are particularly vulnerable to misunderstanding.

The Commissioners' parliamentary responses disputed claims that £5 million had already been spent on Project Spire.

They separately disputed a proposed £5 million forecast for 2026–28.

The investigation must preserve those corrections accurately.

The existence of a figure in a parliamentary question does not prove its accuracy.

Similarly, an approximate historical spending total should not be presented as a complete expenditure figure through a later date.

Financial records should identify their accounting period and inclusion criteria.

Where later figures supersede earlier reports, the relationship should be explained.

21.33. Corrections concerning consultation and community representation

A consultation report may identify particular organisations or participant categories.

The investigation should establish whether organisations can challenge inaccurate descriptions of their participation.

For example, an organisation may have attended a meeting without endorsing the final recommendations.

Another may have submitted written concerns that were not reflected in a public summary.

The institution should have an appropriate means of considering such corrections.

The objective is not to require publication of every private communication.

It is to prevent inaccurate public claims concerning representation or consent.

Participation should be described according to the evidence.

21.34. Corrections concerning Institutional Racism and safeguards

RNL's questions about anti-Black racism and Institutional Racism must be reproduced accurately.

The central enquiry concerns whether institutions recognise the possibility of racial bias and can demonstrate safeguards protecting their decisions.

That enquiry must not be transformed into an unsupported allegation that a named person has committed wrongdoing.

Equally, the existence of no established discriminatory finding should not be used as a substitute for explaining the safeguards.

These are different questions.

A complete answer should identify the relevant policies, responsible officers, review procedures and evidence of operation.

Where the institution disputes a premise, it should explain its position without replacing the original question.

21.35. Complaint channels and escalation

The Commissioners' public enquiry mechanism is an identified route for communication.

However, a general enquiry channel may not be equivalent to a formal complaints process.

The investigation should establish whether separate procedures exist for complaints concerning employment, discrimination, research, funding decisions or governance.

It should also determine how a correspondent may escalate an unanswered or unsatisfactory response.

An escalation mechanism should identify the responsible person or body and the standards by which the matter will be considered.

Where a statutory regulator has authority, that route should be explained accurately.

The investigation should not presume that every complaint falls within the jurisdiction of a single body.

21.36. The right to receive an explanation of non-disclosure

Institutions may possess legitimate reasons for withholding particular information.

These may involve personal data, legal professional privilege, contractual confidentiality or other protected interests.

However, a refusal should identify the relevant reason as precisely as appropriate.

Where only part of a document is restricted, the institution should consider whether a redacted version can be provided.

Where an alternative public record exists, the respondent may identify it.

The investigation should distinguish a refusal based upon an identifiable restriction from an incomplete response that gives no substantive explanation.

The objective is the fullest appropriate disclosure, not an assumption that every document must be released without limitation.

21.37. The right to receive a complete response

RNL's investigation contains detailed questions concerning several institutional subjects.

A general reply expressing support for reparatory justice may not answer a question about a specific contract.

A statement describing the fund's purpose may not answer whether regulatory authorisation has been granted.

A link to the historical research report may not answer what safeguards govern contemporary grant-making.

The investigation should therefore assess responses against the actual questions submitted.

A complete response may provide an answer, explain why information is unavailable or identify the appropriate institution.

Where a question remains unresolved, the register should state that fact.

The objective is substantive clarity.

21.38. The treatment of large investigative documents

RNL's Project Spire investigation is intended to serve as a comprehensive permanent reference record.

Its length reflects the number of institutions, historical documents, legal questions, financial categories and governance matters requiring examination.

A shorter executive briefing may be useful for readers requiring a rapid overview.

However, an executive briefing should not replace the full evidence record.

Likewise, a respondent's preference for fewer questions does not determine the legitimate scope of an independent investigation.

Questions may be grouped into manageable correspondence.

They should not be abandoned merely to make the investigation appear shorter.

The objective is effective communication without sacrificing substantive accuracy.

21.39. Reasonable sequencing of enquiries

A comprehensive investigation should nevertheless organise its requests professionally.

Different institutions may possess different records.

The Church Commissioners may be able to answer historical and financial questions while the Charity Commission holds regulatory records.

Lambeth Palace Library may possess information concerning archival appointments.

The GRH organisers may possess information about their own events.

Requests should therefore be directed to the appropriate respondent.

Where answers depend upon earlier information, questions may be sequenced.

This reduces unnecessary duplication and helps establish a clear documentary trail.

Professional sequencing should serve completeness, not concealment or dilution.

21.40. A structured response register

RNL should establish a response register containing each substantive question.

The register should record the question identifier, subject, receiving institution, date sent, response date, document reference and answer status.

The register should distinguish complete answers, partial answers, refusals with reasons, referrals and unanswered questions.

It should also identify any follow-up required.

Where a response addresses several questions, the same source may be linked to multiple entries.

The register should preserve the exact wording of both question and answer.

A summary may be added, but it should not replace the original material.

21.41. An institutional responsibility register

A separate register should identify which organisation possesses responsibility for each principal issue.

This should include historical research, programme governance, legal authorisation, financial expenditure, archival appointments, community consultation, future grant-making and complaints.

The register should also identify areas where responsibility remains uncertain.

Those entries should be marked for clarification.

The purpose is to prevent enquiries from circulating indefinitely between institutions.

Where one organisation states that another holds the necessary records, that statement should be preserved and tested.

The register should not assign responsibility through unsupported inference.

21.42. An evidence-preservation register

Each material document should be assigned a unique evidence identifier.

The record should include title, source institution, publication date, retrieval date, document type and file location.

Where a document has multiple versions, they should be recorded separately.

Relevant material includes press releases, reports, parliamentary answers, correspondence, programme documents and regulatory records.

The register should also identify whether the document is primary, secondary, attributed testimony or unverified material.

This structure permits an investigator to distinguish established facts from matters requiring further corroboration.

It also supports future corrections.

21.43. The importance of preserving contradictory evidence

An independent investigation must preserve evidence that supports different interpretations.

For example, the Commissioners may publish a statement explaining their legal position.

Critics may publish a contrary interpretation.

The institution may respond to that criticism.

Each document should be preserved.

The investigation should not select one interpretation merely because it aligns with an existing suspicion.

Nor should it dismiss critical evidence merely because the Commissioners disagree with it.

The relevant sources must be assessed according to their authority, specificity, methodology and supporting documentation.

The objective is a record capable of supporting fair independent conclusions.

21.44. Distinguishing factual disagreement from deliberate misinformation

Two parties may disagree about the meaning of a historical document.

An institution may publish information that later requires correction.

A journalist may misunderstand the status of a proposed fund.

A community participant may receive incomplete event information.

These circumstances do not automatically establish deliberate misinformation.

Intent requires additional evidence.

The investigation must distinguish error, omission, disagreement, misleading presentation and deliberate deception.

Each has different evidential requirements.

The presence of confusion justifies clarification.

It does not authorise conclusions about motives without supporting records.

21.45. The importance of communication in preventing conflict

RNL maintains that transparent communication is an essential preventative safeguard.

Reparatory justice involves historical suffering, contested responsibilities and potentially substantial financial resources.

Unclear public information may create misunderstanding concerning who controls money, who represents affected communities or when benefits may become available.

Such misunderstandings can contribute to frustration and serious disputes.

The possibility of intimidation, threats of violence or violence should therefore be considered as a matter for responsible conflict prevention.

This is not a prediction that violence will occur.

It is not an allegation that any person associated with Project Spire has threatened violence.

The investigation advocates lawful, peaceful and evidence-based methods.

Clear written answers, accurate documents and fair complaints procedures can help prevent unnecessary escalation.

21.46. The importance of respectful treatment

Institutions should respond to legitimate questions professionally.

A question should not be dismissed merely because it is challenging.

An investigator should not be treated as having made an allegation merely because they ask whether a risk has been considered.

Similarly, respondents should not be threatened, intimidated or subjected to unsupported accusations.

The investigation requires mutual respect without sacrificing scrutiny.

RNL will preserve the original questions and evaluate responses according to their substance.

Where a respondent supplies useful evidence, that contribution should be acknowledged.

Where a response remains incomplete, further questions may be justified.

The objective is accountable communication.

21.47. RNL's independent communications protocol

RNL should adopt a consistent protocol for written enquiries.

Each communication should identify the project, the responsible sender, the subject and the requested action.

Questions should be numbered.

Supporting documents should be identified by exact title and date.

The respondent should be invited to supply primary records or direct links.

Where information is unavailable, the respondent should be asked to explain why.

Corrections should be welcomed and recorded.

RNL's standing declaration concerning the absence of accusations, allegations, assumptions, assertions of wrongdoing and conclusions should be preserved where relevant.

The protocol should distinguish requests for evidence from findings.

21.48. The protection of independent investigative authority

RNL's investigation is independent.

The institutions being examined may supply information, explanations and corrections.

They do not thereby acquire authority to determine the scope of RNL's work.

Similarly, cooperation with an institution should not be described as endorsement of all its policies.

The investigation should remain free to pursue legitimate unanswered questions.

However, independence also creates responsibilities.

RNL must distinguish verified facts from possibilities and suspicions.

It must provide fair opportunities for response.

It must correct inaccuracies.

It must avoid disclosing protected information without justification.

Independent investigative authority requires both freedom of enquiry and disciplined evidence handling.

21.49. Priority questions concerning public information

Question 21.1: Who is responsible for maintaining the Church Commissioners' Project Spire information pages?

Question 21.2: What procedures govern updates to those pages?

Question 21.3: Are material updates dated?

Question 21.4: Are previous versions preserved?

Question 21.5: How can members of the public identify the most recent institutional position?

Question 21.6: What procedures verify the accuracy of published financial figures?

Question 21.7: What procedures verify the accuracy of governance and appointment information?

Question 21.8: How are material errors corrected?

Question 21.9: Is there a public corrections register?

Question 21.10: Will the Commissioners publish a complete dated chronology of Project Spire's major decisions and implementation milestones?

21.50. Priority questions concerning documentary access

Question 21.11: What original research records are available for public inspection?

Question 21.12: How can members of the public access the digitised Queen Anne's Bounty financial records?

Question 21.13: What limitations apply to remote archival access?

Question 21.14: What complete consultation and Oversight Group documents are publicly available?

Question 21.15: What Board decisions or summaries may lawfully be disclosed?

Question 21.16: What regulatory applications and authorisations may be published?

Question 21.17: What project-level financial records may be disclosed?

Question 21.18: What contract and professional appointment information can be provided?

Question 21.19: What restrictions apply to particular documents?

Question 21.20: Will the Commissioners provide a consolidated public document index identifying available and unavailable records?

21.51. Priority questions concerning response standards

Question 21.21: What is the official procedure for submitting detailed written questions about Project Spire?

Question 21.22: Does the stated 30-working-day response aim apply to all enquiries or only certain categories?

Question 21.23: When does that response period begin?

Question 21.24: Are enquiries acknowledged individually?

Question 21.25: What happens where a complete answer cannot be provided within the target period?

Question 21.26: Are interim responses issued?

Question 21.27: Can a correspondent request escalation of an overdue enquiry?

Question 21.28: How are questions referred to the correct responsible institution?

Question 21.29: Are unanswered questions tracked?

Question 21.30: What procedures ensure that a response addresses the question actually asked?

21.52. Priority questions concerning institutional responsibilities

Question 21.31: Which Church Commissioners office is responsible for responding to historical research questions?

Question 21.32: Which office is responsible for Project Spire financial enquiries?

Question 21.33: Who answers questions concerning proposed fund governance?

Question 21.34: Who answers questions concerning Charity Commission applications?

Question 21.35: Who holds records relating to Project Spire professional appointments?

Question 21.36: What authority does Lambeth Palace Library possess over relevant archival employment records?

Question 21.37: What formal relationships exist between Project Spire and external reparations organisations?

Question 21.38: Who is authorised to confirm the institutional capacity of relevant personnel?

Question 21.39: What procedures prevent individuals from being incorrectly presented as representing the Commissioners?

Question 21.40: Will the institution publish a responsibility chart identifying the appropriate department for each category of enquiry?

21.53. Priority questions concerning corrections and procedural fairness

Question 21.41: How can a person request correction of inaccurate Project Spire information?

Question 21.42: Can an organisation challenge a claim that it participated in or endorsed consultation?

Question 21.43: How are corrections to professional biographies and institutional roles handled?

Question 21.44: How are disputed financial figures assessed?

Question 21.45: Are original records preserved after corrections?

Question 21.46: What procedure permits correction of an inaccurate institutional response?

Question 21.47: Can correspondents request a review of an incomplete or misleading answer?

Question 21.48: How does the institution distinguish legitimate questions from allegations of wrongdoing?

Question 21.49: How are uncertainty and disputed interpretations preserved in public statements?

Question 21.50: What remedies exist where a material communication error causes practical disadvantage?

21.54. Priority questions concerning anti-Black racism and Institutional Racism

Question 21.51: Do the Commissioners acknowledge the possibility that anti-Black racism or Institutional Racism could affect institutional communications or decisions?

Question 21.52: What safeguards apply to the treatment of enquiries from Black/Afrikan individuals and organisations?

Question 21.53: What procedures protect against racial bias in complaint handling?

Question 21.54: Can a person request independent review where they are concerned about the fairness of a response?

Question 21.55: What evidence demonstrates that relevant staff receive training concerning racial-justice issues?

Question 21.56: How are complaints concerning possible discrimination recorded?

Question 21.57: What safeguards prevent a complaint from being dismissed or mischaracterised without proper consideration?

Question 21.58: What protections exist against victimisation for raising legitimate concerns?

Question 21.59: What independent body can examine unresolved institutional-racism concerns?

Question 21.60: Will the Commissioners provide a complete written explanation of the safeguards protecting their communications and complaints processes?

21.55. Priority questions concerning transparency and conflict prevention

Question 21.61: What procedures ensure timely public explanation of significant changes to Project Spire?

Question 21.62: How are affected communities informed of delays?

Question 21.63: What arrangements permit peaceful resolution of serious disputes?

Question 21.64: How are legitimate criticism and actual threats distinguished?

Question 21.65: What measures protect correspondents from intimidation?

Question 21.66: What measures protect institutional personnel from harassment?

Question 21.67: What procedures correct inaccurate public information that could contribute to conflict?

Question 21.68: How are significant complaints escalated to responsible decision-makers?

Question 21.69: What independent mediation or review options are available?

Question 21.70: Will the Commissioners publish a clear communication and accountability protocol before the proposed fund becomes operational?

21.56. Preliminary evidential findings

The Church Commissioners maintain an official public information hub concerning their historical connections with African chattel enslavement.

The institution has published interim and full historical research reports.

Its related-documents collection includes Oversight Group terms of reference, questionnaire analysis, recommendations, General Synod material and responses to criticisms.

The Commissioners also maintain a substantial Frequently Asked Questions page.

A separate feedback page invites members of the public to submit questions and states an aim to respond within 30 working days.

The same page describes the proposed Fund for Healing, Repair and Justice as remaining in implementation and not yet operational.

Parliamentary questions have produced important dated explanations of financial expenditure, regulatory processes and the original £100 million commitment.

These are documented mechanisms of public information and accountability.

However, the evidence examined does not establish that all substantive enquiries receive complete responses within the published target.

It does not establish a comprehensive public corrections register.

It does not provide a complete current index of regulatory decisions, project-level financial transactions or professional contracts.

Nor does it establish that every outstanding matter concerning governance, institutional overlap and safeguards has been answered.

These issues remain appropriate subjects for further written enquiry.

21.57. Conclusion: transparency requires answers that can be checked

The Church Commissioners have published substantial material concerning Project Spire.

The public can inspect historical research, institutional explanations, Oversight Group documents, consultation findings and parliamentary responses.

These publications provide an important starting point for independent scrutiny.

However, the existence of information is not the same as the completeness of information.

A substantial reference collection may still contain unanswered questions.

A public feedback mechanism may exist without establishing that every substantive enquiry has been resolved.

A financial commitment may be announced without providing a complete transaction record.

A professional appointment may be publicly documented without clarifying its contractual or institutional boundaries.

The investigation must therefore assess transparency through the practical availability of evidence and the clarity of institutional responses.

RNL will preserve the original documents, seek written answers, identify incomplete responses and maintain a chronological record of corrections.

It will distinguish general enquiries from statutory information rights and will not presume that every institution is automatically subject to the Freedom of Information Act.

The investigation will also preserve the original meaning of questions concerning possible anti-Black racism and Institutional Racism.

It will not transform questions about safeguards into allegations of proven wrongdoing.

The central conclusion of Section 21 is that Project Spire possesses a substantial published information framework, but the completeness, current accuracy, accessibility and demonstrated effectiveness of its communications remain matters requiring ongoing documentary scrutiny.

RNL considers that clear written answers, transparent records, timely updates and accessible corrections are essential to institutional confidence.

They also help prevent avoidable disputes and support the peaceful delivery of reparatory justice.

SECTION 21 — COMMUNICATIONS AND TRANSPARENCY EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-21-001	Official Project Spire historical information hub	Published
SPIRE-21-002	Interim historical research report	Published
SPIRE-21-003	Full historical research report	Published
SPIRE-21-004	Oversight Group terms of reference	Published
SPIRE-21-005	Oversight Group questionnaire analysis	Published
SPIRE-21-006	Oversight Group recommendations	Published
SPIRE-21-007	Institutional response to criticisms	Published

SPIRE-21-008	Frequently Asked Questions	Published
SPIRE-21-009	Public feedback mechanism	Published
SPIRE-21-010	Aim to respond within 30 working days	Published institutional statement
SPIRE-21-011	Fund described as not operational	Current official page
SPIRE-21-012	Parliamentary answers concerning expenditure and legal authority	Published dated records
SPIRE-21-013	Complete public regulatory chronology through October 2026	Further verification required
SPIRE-21-014	Complete Project Spire financial transaction register	Outstanding
SPIRE-21-015	Complete professional appointments and contracts register	Outstanding
SPIRE-21-016	Public corrections and version-history procedure	Not established from reviewed sources
SPIRE-21-017	Demonstrated compliance with 30-working-day response aim	Not independently established
SPIRE-21-018	Institution-specific statutory information rights	Legal scope requires confirmation
SPIRE-21-019	Project-specific complaint escalation mechanism	Further verification required
SPIRE-21-020	Effective safeguards against anti-Black racism in communications	Further documentary examination required

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SOURCES AND INDEPENDENT VERIFICATION

Source 21.1 — Church Commissioners: Historical Links to African Chattel Enslavement

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/church-commissioners-links-african-chattel-enslavement

Evidence: Official public information framework.

Source 21.2 — Church Commissioners: Related Documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Evidence: Original research, Oversight Group materials, General Synod documents and responses to criticism.

Source 21.3 — Church Commissioners: Frequently Asked Questions

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Evidence: Institutional explanations concerning historical research, legal status, fund development and consultation.

Source 21.4 — Church Commissioners: Tell Us What You Think

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Public contact mechanism, 30-working-day response aim and stated operational status.

Source 21.5 — Church Commissioners: Publications

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

Evidence: Annual reports, financial statements and historical research material.

Source 21.6 — UK Parliament: Question 69330, answered 1 September 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

Evidence: Distinction between the proposed £100 million commitment, regulatory authorisation and preparatory expenditure.

Source 21.7 — UK Parliament: Question 63009, answered 6 July 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

Evidence: Official response correcting a disputed £5 million spending claim.

Source 21.8 — UK Parliament: Question 47118, answered 6 May 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-04-22/47118/

Evidence: Dated clarification concerning Charity Commission discussions and applications.

Source 21.9 — Information Commissioner's Office: Accessing Official Information

https://ico.org.uk/for-the-public/official-information/

Evidence: General guidance concerning statutory information requests and qualifying public authorities.

Source 21.10 — Freedom of Information Act 2000

https://www.legislation.gov.uk/ukpga/2000/36/contents

Evidence: Statutory framework for access to information held by covered public authorities.

Source 21.11 — Environmental Information Regulations 2004

https://www.legislation.gov.uk/uksi/2004/3391/contents

Evidence: Separate statutory framework for environmental information requests where applicable.

Source 21.12 — Church Commissioners: Our Response

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/our-response

Evidence: Institutional objectives, proposed investment and grant-making approach, and engagement arrangements.

END OF SECTION 21 — PUBLIC COMMUNICATIONS, INSTITUTIONAL TRANSPARENCY, ACCESS TO INFORMATION, RESPONSE TIMES, DOCUMENT PRESERVATION, CORRECTIONS AND THE RIGHT TO RECEIVE CLEAR WRITTEN ANSWERS

NEXT: SECTION 22 OF 24 — FORMAL INVESTIGATIVE QUESTIONS, DOCUMENTARY DISCLOSURE, INSTITUTIONAL RESPONSIBILITY, RIGHT OF REPLY AND THE CONSOLIDATED ACTION PLAN.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 22 OF 24

FORMAL INVESTIGATIVE QUESTIONS, DOCUMENTARY DISCLOSURE, INSTITUTIONAL RESPONSIBILITY, RIGHT OF REPLY AND THE CONSOLIDATED ACTION PLAN

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Principal investigative questions consolidated. Institutional responses, further primary documents, independent verification and final findings remain outstanding.

22.1. Purpose of this section

This section converts the documentary findings and unresolved questions developed throughout Sections 1–21 into a structured programme of further investigation.

The earlier sections established that Project Spire originated from the Church Commissioners for England's investigation into historical financial connections with African chattel enslavement.

They examined Queen Anne's Bounty, South Sea Company investments, historical financial valuations, the original £100 million commitment, the proposed Fund for Healing, Repair and Justice, legal authorisation, governance, community consultation, racial-justice safeguards, professional appointments and financial transparency.

They also identified documented professional connections between individuals associated with Project Spire-related work and the Global Reparations Hub launch of 17 October 2026.

The investigation has therefore progressed beyond its initial foundation of community questions and suspicions.

It now possesses a substantial body of documentary evidence.

However, documentary progress does not mean that every question has been resolved.

Important matters remain outstanding concerning legal authority, financial expenditure, current governance, professional roles, conflicts of interest, community participation, safeguards and verified reparatory delivery.

This section establishes how those questions should be pursued, which institutions should be approached and what evidence is required.

22.2. The investigation's governing principle

RNL's investigation must remain independent, evidence-based and open to correction.

It must distinguish documented facts from attributed accounts, suspicions, interpretations and unresolved questions.

The investigation must not treat the existence of professional overlap as proof of wrongdoing.

It must not treat the absence of a document supplied to RNL as proof that the document does not exist.

It must not treat institutional assurances as proof that every safeguard operates effectively.

It must not confuse the announcement of £100 million with the delivery of £100 million.

It must not assume that every person consulted represents the wider Black/Afrikan community.

Its conclusions must follow the evidence rather than determine in advance what the evidence should establish.

22.3. RNL's formal declaration

The following declaration should accompany substantive external communications where relevant:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

The enquiry specifically concerns the **possibility** of anti-Black racism, racial bias and Institutional Racism where safeguards have not been demonstrated to the investigator.

These words must not be replaced with an allegation that racism has already been established.

Equally, an institution's statement that no discriminatory wrongdoing has been proved does not, by itself, answer a request for evidence of safeguards.

The respondent should address the question actually asked.

22.4. Preservation of the three separate investigations

Project Spire must remain distinct from RNL's wider Global Reparations Hub investigation and its separate Black Cultural Centre enquiry.

The Project Spire investigation concerns the Church Commissioners' historical research, proposed reparatory response, personnel, governance, finances, authorisations and safeguards.

The GRH investigation concerns the separate hub's establishment, organisational responsibility, consultation, governance and funding.

The Black Cultural Centre enquiry concerns the advertised venue, booking authority, cancellation and communications surrounding the original launch arrangements.

Where a person or event appears in more than one investigation, the relevant evidence may be cross-referenced.

However, that overlap does not authorise the merger of the investigations.

Each institution must be examined according to its own responsibilities.

22.5. The principal institutional respondents

The investigation identifies several categories of respondents.

Institution or respondent	Principal matters
Church Commissioners for England	Project Spire decisions, expenditure, appointments, governance, financial commitment and safeguards
Charity Commission for England and Wales	Charity registration, statutory authorisations and relevant regulatory status
Lambeth Palace Library	Archival research, professional appointments, institutional responsibilities and access to records
Fund for Healing, Repair and Justice, if separately established	Governing documents, trustees, financial controls and operational arrangements
Original Oversight Group or authorised successor representatives	Consultation methodology, recommendations and advisory responsibilities

Grant Thornton UK LLP	Scope and methodology of commissioned forensic accounting, subject to contractual and confidentiality limits
Relevant academic institutions	Documented research appointments and institutional collaborations
Black History Studies	Its own professional or contractual relationship with Project Spire, if any
Building Trust Consortium	Its own professional or contractual relationship with Project Spire, if any
Global Reparations Hub organisers	Confirmation of any formal Project Spire relationship, without merging the separate investigation

This allocation is provisional.

The correct legal or administrative respondent should be verified before formal correspondence is issued.

22.6. The Church Commissioners as the primary respondent

The Church Commissioners are the principal institution responsible for the development of Project Spire.

They are therefore the appropriate starting point for most outstanding enquiries.

RNL should submit a consolidated request seeking written answers on historical research, expenditure, governance, legal approvals, professional roles, community participation and safeguards.

The request should identify the relevant sections of the investigation without requiring the recipient to read the entire report before understanding what action is requested.

A shorter accompanying question schedule may be used for administrative convenience.

However, the full investigation should remain intact as the permanent evidence record.

The Commissioners should also be invited to correct factual errors and identify records that RNL has overlooked.

22.7. The Charity Commission as a separate regulatory respondent

The Charity Commission should be approached concerning matters within its own statutory responsibility.

The enquiry should seek confirmation of the status of any application to register the Fund for Healing, Repair and Justice.

It should also seek clarification of any application for authorisation under section 106 of the Charities Act 2011.

Where decisions have been made, RNL should request references and publicly disclosable documents.

However, the Charity Commission should not be treated as responsible for answering every historical or organisational question concerning Project Spire.

Its role is regulatory.

The Church Commissioners remain responsible for explaining their own institutional decisions.

22.8. The importance of a current regulatory statement

The parliamentary record establishes that the legal and regulatory process developed over several stages.

In May 2025, the Commissioners stated that discussions had occurred concerning a possible section 106 application.

In September 2025, they confirmed that the £100 million remained within their general fund pending authorisation.

Subsequent statements described work towards a new charitable entity and the preparation of further applications.

The Commissioners' public information continues to describe the fund as not yet operational.

These statements must be preserved as dated records.

However, RNL must obtain the current position as at the latest available date.

It should not assume that the status recorded in an earlier parliamentary answer remains unchanged.

22.9. Lambeth Palace Library as an archival respondent

Lambeth Palace Library is relevant because published records identify archival research associated with Project Spire.

These include work involving Dr Annabelle Gilmore and Kwesi Ochosi.

A September 2026 Library publication expressly identifies Kwesi Ochosi as Project Spire Coordinator: Archives.

This is an established professional connection.

The Library should be asked to clarify the institutional framework, appointment arrangements, research scope and reporting responsibilities.

However, its archival research role must not be confused with the Church Commissioners' authority over the proposed financial fund.

The purpose of the enquiry is to establish where responsibility begins and ends.

22.10. Professional appointment enquiries

RNL should seek a consolidated register of professional appointments associated with Project Spire.

This should distinguish employees, consultants, contractors, academic collaborators, archivists and advisers.

The register should identify the commissioning institution, general responsibilities, dates and relevant authority.

Where financial information is available, the programme should identify the cost or budgetary treatment of professional services.

The investigation does not require unnecessary disclosure of private personal information.

Its concern is institutional expenditure and accountability.

The existence of an appointment should not automatically be described as evidence of improper influence.

22.11. Charmaine Simpson: specific questions

The published record identifies Charmaine Simpson in a Church Commissioners research and engagement role.

It also identifies her with Black History Studies and the GRH launch.

RNL should therefore seek clarification of the institutional capacity in which she undertook each relevant activity.

The Commissioners should be asked whether her Project Spire-related work was undertaken through employment, consultancy or an organisational agreement.

The enquiry should establish whether she possessed any authority concerning governance, investment or grant-making.

It should also seek confirmation of whether Black History Studies had any contractual or financial relationship with Project Spire.

These are questions about documented roles.

They are not allegations.

22.12. Kwesi Ochosi: specific questions

The published record identifies Kwesi Ochosi as Project Spire Coordinator: Archives.

It also identifies his involvement in Building Trust Consortium and the GRH launch.

RNL should seek the exact nature of his archival appointment, its duration, supervision and institutional budgetary source.

The Commissioners and Library should clarify whether he possessed any financial or governance authority beyond the archival responsibilities described.

They should also confirm whether any formal relationship existed between Project Spire and Building Trust Consortium.

The existence of two documented professional associations does not establish an improper conflict.

It provides a legitimate basis for requesting clarification concerning institutional boundaries.

22.13. The importance of examining actual decisions

The investigation should not infer misconduct from a person's job title or affiliations.

Where a conflict-of-interest question arises, the relevant decision must be identified.

The enquiry should establish whether the person participated in that decision, what duties applied, whether a relevant interest existed and how it was managed.

A potential conflict may be properly declared and managed.

A professional association may have no relevance to the decision being examined.

The investigation should therefore distinguish potential conflicts, actual conflicts and demonstrated misconduct.

Only evidence can justify movement between those categories.

22.14. Financial disclosure priorities

The money trail remains a principal investigative priority.

The Church Commissioners should be asked to reconcile the original £100 million commitment with subsequent expenditure and implementation.

The response should distinguish preparatory research expenditure from the proposed fund capital.

It should identify the approximate £1 million reported through December 2024 and provide later figures where available.

It should explain the treatment of internal staff costs.

It should also identify whether any part of the £100 million has been formally allocated, transferred, invested or paid as grants.

The investigation must preserve each category separately.

22.15. The proposed financial reconciliation

RNL should request the following structure:

Financial category	Required explanation
Original commitment	Date, amount, approval and conditions
Preparatory expenditure 2019–24	Reconciliation of reported approximately £1 million
Preparatory expenditure 2025	Actual annual amount and categories
Preparatory expenditure 2026	Latest available amount and reporting date
Internal staff costs	Included, excluded or estimated, with methodology
Professional contracts	Aggregate or appropriately itemised values
Proposed fund capital	Present legal holder and accounting treatment
Regulatory authorisations	Application and approval status
Transfers	Amounts, dates, sending and receiving entities
Investments	Completed transactions and financial instruments
Grants	Approved, paid and received amounts
Verified reparatory outcomes	Identified benefits supported by evidence

A blank category should not be interpreted as zero.

Where information is unavailable, its status should be explained.

22.16. The need to establish the original £100 million calculation

The Church Commissioners' historical research identified substantial financial connections with African chattel enslavement.

The Commissioners subsequently selected £100 million as their institutional commitment.

However, the publicly available material examined does not provide a complete calculation linking the commitment directly to a valuation of historical financial benefit.

RNL should therefore request the decision-making rationale.

The Commissioners should explain whether the amount was determined through financial valuation, institutional affordability, charitable policy, moral consideration or a combination of factors.

They should also identify whether alternative amounts were examined.

This is a legitimate question about institutional proportionality.

It does not presume that the amount was selected improperly.

22.17. The £1 billion ambition

The Oversight Group recommended developing the initiative towards a scale of £1 billion or more.

The Church Commissioners maintained that their own contribution remained £100 million.

RNL should therefore seek a separate statement concerning the wider ambition.

The statement should distinguish funds legally committed by other institutions from expressions of interest and projected future growth.

It should also identify the rights attached to external contributions.

A commercial investment should not automatically be described as a reparatory donation.

Nor should the proposed £1 billion scale be presented as secured capital without evidence.

The objective is accurate reporting.

22.18. Governance disclosure priorities

The Commissioners should be asked to provide an updated governance structure.

This should identify the Board of Governors, relevant committees, implementation workstreams, delegated officers and any proposed fund trustees.

It should also clarify the continuing status of the Oversight Group.

The investigation should distinguish advisory functions from legal authority.

It should identify who may approve expenditure, appoint trustees, authorise investments and decide grants.

Where a separate fund has not yet been established, proposed arrangements should be described as proposed.

The governance record must reflect the actual stage of implementation.

22.19. Black community leadership and ownership

The Oversight Group recommended that the proposed fund should ultimately be Black-led and community-owned.

These terms require clarification.

The Commissioners should explain whether affected communities will possess formal powers to appoint trustees, influence investment policy, select priorities or review decisions.

The investigation must distinguish community participation from control over assets.

A Black-majority advisory group is not necessarily equivalent to a community-owned fund.

Similarly, a trustee board may have legal authority without possessing a representative mandate from every affected community.

The question is what rights actually exist or are proposed.

22.20. Consultation disclosure priorities

The Church Commissioners report that 1,106 people participated in their combined engagement activities and global survey.

RNL should seek clarification of the methodology and participation records.

The response should identify how organisations were approached, how geographical reach was assessed and how dissenting views were recorded.

It should also explain whether the reported figure represents unique participants.

The investigation should request information concerning continuing consultation after the original 2023 exercise.

The purpose is not to deny the documented consultation.

It is to establish its scope, influence and limitations.

22.21. Independent grassroots participation

RNL should seek a clear explanation of how longstanding independent Black/Afrikan reparations organisations were identified and invited.

The investigation should determine whether groups operating outside established Church, academic or professional networks had meaningful opportunities to participate.

It should also establish whether organisations that did not participate in 2023 can contribute during implementation.

Participation should not automatically be treated as endorsement.

The institution should explain how it distinguishes consultation, representation, consent and decision-making authority.

These are essential questions for community confidence.

22.22. The right to remain independent

An organisation should be able to provide historical information, participate in consultation or seek clarification without automatically endorsing Project Spire.

The investigation should establish whether the Commissioners recognise that distinction.

It should also examine whether future funding arrangements impose any conditions affecting lawful criticism or organisational independence.

No improper condition has been established.

The enquiry concerns safeguards for fair participation.

An organisation may support reparatory justice while disagreeing with particular aspects of the proposed financial or governance model.

Such disagreement should be treated as a legitimate part of public discussion.

22.23. Safeguards against anti-Black racism and Institutional Racism

The Commissioners should provide a consolidated written explanation of the safeguards applicable to Project Spire.

The response should identify the relevant Church-wide and Project Spire-specific policies.

It should also explain how those policies protect decisions concerning research, consultation, employment, procurement, governance, investment and grant-making.

RNL specifically seeks confirmation that the institution acknowledges the possibility of anti-Black racism, racial bias and Institutional Racism affecting contemporary decision-making.

The enquiry is preventative.

It does not allege that such discrimination has occurred.

The institution should respond with evidence of safeguards rather than merely denying an allegation that has not been made.

22.24. Evidence of operational safeguards

A written equality policy is relevant.

However, the investigation should also seek evidence of implementation.

Relevant material may include training, risk assessments, independent reviews, complaints procedures, monitoring and corrective action.

The institution should explain how it evaluates effectiveness.

A policy that exists but is not applied may offer limited practical protection.

Conversely, an effective procedure may exist even where RNL has not yet received a copy.

The investigation must therefore distinguish evidence supplied from assumptions about the institution.

The objective is to establish what actually operates.

22.25. Independent complaints and review

RNL should establish how affected persons and organisations may challenge decisions.

This may concern consultation, professional appointments, eligibility, grants, investments or alleged discrimination.

The responsible institution should identify the applicable complaints process.

It should explain whether the complaint can be submitted in writing, who considers it and whether independent review is available.

The investigation should also seek information concerning protection against victimisation.

A person should be able to raise legitimate concerns without being required to accept the institution's preferred interpretation.

The process must remain fair to both complainant and respondent.

22.26. Access to historical records

RNL should seek improved access to the original historical evidence supporting Project Spire.

The Church Commissioners' report relies upon Queen Anne's Bounty financial records, benefaction registers and other archival material.

The investigation should establish what records are digitised and how they can be accessed remotely.

It should also determine whether full source references are available.

Where records cannot be disclosed or reproduced, the institution should explain the restrictions.

The purpose is independent verification.

A historical conclusion becomes more useful when others can inspect its supporting evidence.

22.27. Access to professional and financial records

The Commissioners should be asked for appropriately detailed information concerning professional appointments, contracts and expenditure.

However, disclosure should respect lawful privacy, confidentiality and privilege requirements.

The investigation should not demand unrelated personal information.

Where complete records cannot be disclosed, redacted documents or institutional summaries may be appropriate.

The response should identify any restrictions relied upon.

A restriction should not be treated automatically as proof of wrongdoing.

The objective is proportionate institutional transparency.

22.28. Parliamentary records as supporting evidence

Parliamentary questions have produced important information about Project Spire.

These include the original commitment, research expenditure, legal authorisation, the proposed new charity and the Commissioners' response to disputed financial claims.

The investigation should preserve the questions together with the answers.

The date of each answer must remain visible.

A statement about the position in September 2025 should not automatically be presented as the position in October 2026.

The consolidated evidence register should identify later updates where available.

This prevents confusion arising from changes over time.

22.29. The need for a consolidated documentary disclosure schedule

RNL should create a formal disclosure schedule identifying every material document requested.

The schedule should be divided by institution and subject.

Each entry should record the document title or description, the reason it is relevant, the institution likely to hold it and the response status.

Where a respondent states that no such record exists, that response should be preserved.

Where a document is withheld, the reason should be recorded.

Where a replacement or summary is supplied, the limitation should be identified.

The schedule should permit future readers to understand exactly what evidence was obtained and what remains unavailable.

22.30. The need for an evidence-status classification

Every material proposition should be classified according to its evidential position.

The recommended categories are:

Status	Meaning
Documented	Supported directly by an identifiable reliable record
Corroborated	Supported by more than one relevant source
Attributed account	Reported by an identifiable person but not independently established in full
Official position	Statement made by the responsible institution
Contested	Material disagreement remains between relevant sources
Possible	A proposition requiring further evidence
Suspected	A concern expressly attributed to the person expressing it
Unverified	Insufficient supporting evidence
Not established	No adequate basis for a finding
Corrected	An earlier statement has been amended following new evidence

These categories should not be confused.

For example, an official position may be clearly documented while its completeness remains contested.

Likewise, a suspicion may justify investigation without becoming an established finding.

22.31. Institutional responsibility versus personal association

The investigation must distinguish responsibility arising from an institutional role from mere association.

A person may work on a Project Spire archival assignment while independently participating in a GRH event.

Those activities may involve different institutions and purposes.

The existence of the same person in both settings does not establish that one institution controls the other.

A formal relationship should be supported by appointment records, contracts, governing documents, payments or other appropriate evidence.

Where such evidence does not exist, the investigation should state that the relationship has not been established.

This protects against inaccurate institutional attribution.

22.32. Fair right of reply

Every institution and individual whose documented conduct or responsibilities are materially examined should have an opportunity to respond.

The right of reply should identify the relevant facts and questions clearly.

It should avoid presenting an unresolved suspicion as a conclusion.

Respondents should be invited to provide corrections and supporting evidence.

Where a response is received, it should be preserved accurately.

Where no response is received, the investigation should record the date and scope of the request without assuming that silence establishes wrongdoing.

The purpose is fair and reliable fact-finding.

22.33. The importance of a reasonable response period

The Church Commissioners' public enquiry mechanism states an aim to respond within 30 working days.

RNL should take that published aim into account when setting follow-up dates.

However, other institutions may have different procedures.

A reasonable response period should depend upon the complexity and urgency of the questions.

The investigation should avoid treating a missed informal target as proof of improper conduct.

Nevertheless, material delays should be documented.

Where an institution cannot respond fully, an acknowledgement and explanation may assist.

The objective is productive communication rather than unnecessary confrontation.

22.34. Handling incomplete responses

A partial response should be recorded as partial.

The investigation should identify which questions were answered and which remain outstanding.

It should not repeat every answered question unnecessarily.

A follow-up should refer to the original correspondence and request clarification on specific points.

Where an institution refuses information, the reason should be examined.

Where responsibility lies elsewhere, the correct institution should be identified.

This approach will help prevent repeated correspondence from becoming confused or unmanageable.

22.35. The need to preserve the original meaning of enquiries

RNL's correspondence must preserve precise distinctions.

A request for evidence of safeguards is not an allegation that racism has occurred.

A question concerning payment is not an allegation that money was misappropriated.

A question concerning an external professional role is not proof of a conflict.

A concern about consultation is not necessarily an assertion that no consultation took place.

The meaning of the original question should not be altered.

Respondents should be invited to address the enquiry as framed.

RNL must apply the same standard to institutional responses.

The investigation should not interpret a limited answer as a broader admission.

22.36. The importance of independent verification

Institutional statements are relevant evidence.

However, some claims may require verification through independent records.

For example, a financial transfer may be checked against accounts or regulatory filings.

A professional appointment may be confirmed through institutional publications or contractual information.

A charity's registration may be checked through the Charity Commission register.

A historical claim may be examined through archival documents.

The level of verification required depends upon the proposition being considered.

Not every routine administrative statement requires exhaustive forensic examination.

However, significant claims concerning authority, money and reparatory delivery should be supported by appropriately reliable evidence.

22.37. Preventing unnecessary allegations

The investigation should not use the absence of a response to justify an unsupported allegation.

It should not interpret uncertainty as proof of deception.

It should not present public criticism as a judicial finding.

It should not presume that a named person benefited financially from a programme merely because they participated in an event.

The appropriate response to uncertainty is further investigation.

Where reliable evidence contradicts a previous suspicion, the report should acknowledge that fact.

Where evidence strengthens a concern, the report should explain precisely how.

The objective is accurate findings rather than predetermined outcomes.

22.38. The importance of corrections

RNL should maintain a permanent corrections register.

The register should identify the original statement, the new evidence, the correction and the date.

The original material should remain traceable where appropriate.

Corrections should not silently erase earlier records.

Where an institution provides an authoritative clarification, the investigation should incorporate it.

Where evidence remains disputed, that status should be recorded.

A willingness to correct errors strengthens the credibility of the investigation.

It also protects individuals and institutions from the consequences of inaccurate public claims.

22.39. The preventative purpose of transparency

RNL considers transparency, professional organisation and accountable decision-making essential foundations for peace.

Reparatory justice concerns historical suffering, competing understandings of responsibility and substantial proposed financial resources.

Unclear information may contribute to misunderstanding and distrust.

Where disagreements become serious, the possibility of intimidation, threats of violence or physical violence should be considered as a matter for prevention.

This does not suggest that violence is inevitable.

It does not attribute violent intentions to the Church Commissioners, affected communities or any named individual.

The investigation seeks to reduce avoidable conflict through early clarification, accurate records, fair procedures and lawful, peaceful dispute resolution.

22.40. The distinction between legitimate criticism and threats

People must be able to question Project Spire without automatically being treated as hostile.

They may disagree about the adequacy of £100 million, the investment model, the proposed governance structure or the extent of community participation.

Such disagreement is part of legitimate public scrutiny.

However, criticism should not involve threats or intimidation.

Institutions should distinguish robust questioning from conduct that creates a genuine safety concern.

The investigation should likewise distinguish peaceful community mobilisation from actual threats.

This approach protects freedom of expression and the safety of participants.

22.41. Consolidated institutional questions: Church Commissioners

The Church Commissioners should be asked to provide one coherent written institutional response addressing the following core matters.

Question 22.1: What is the current legal and operational status of Project Spire and the Fund for Healing, Repair and Justice?

Question 22.2: What was the precise basis for selecting the original £100 million commitment?

Question 22.3: What amount has been spent on Project Spire since 2019, broken down by financial year and principal expenditure category?

Question 22.4: What amount of the £100 million has been formally allocated, transferred, invested or paid as grants?

Question 22.5: What documentary evidence supports any claimed reparatory delivery?

Question 22.6: What governing bodies and officers currently possess authority over the programme?

Question 22.7: What is the current status of the original Oversight Group?

Question 22.8: What is the proposed governance structure of the separate fund?

Question 22.9: How will Black community leadership and ownership be implemented?

Question 22.10: What consultation has occurred since the original 2023 engagement exercise?

Question 22.11: What safeguards exist against the possibility of anti-Black racism and Institutional Racism?

Question 22.12: What independent complaints and review procedures are available?

Question 22.13: What contracts, appointments or financial relationships exist with the external organisations examined in this report?

Question 22.14: What formal institutional relationship, if any, exists between Project Spire and the Global Reparations Hub?

Question 22.15: What additional documents can the Commissioners provide to support their answers?

These core questions do not replace the detailed question schedules in Sections 11–21.

They establish the structure for an initial consolidated institutional response.

22.42. Consolidated questions: Charity Commission

The Charity Commission should be asked:

Question 22.16: Has an application been received to register the Fund for Healing, Repair and Justice?

Question 22.17: What is the present status of that application?

Question 22.18: Has an application concerning ex gratia authorisation under section 106 of the Charities Act 2011 been received?

Question 22.19: Has a decision been issued?

Question 22.20: What public records identify the nature and scope of any authorisation?

Question 22.21: Have any conditions been imposed?

Question 22.22: What publicly disclosable information exists concerning relevant objections or proceedings?

Question 22.23: What regulatory reporting obligations would apply to the proposed fund?

Question 22.24: What procedures govern complaints concerning the administration of a registered charity?

Question 22.25: Which questions should properly be referred back to the Church Commissioners rather than the regulator?

These enquiries must remain within the Charity Commission's actual jurisdiction.

22.43. Consolidated questions: Lambeth Palace Library

The Library should be asked:

Question 22.26: What Project Spire-related archival research programme was undertaken at Lambeth Palace Library?

Question 22.27: Which institution authorised and supervised that work?

Question 22.28: What were the formal roles and responsibilities of Dr Annabelle Gilmore and Kwesi Ochosi?

Question 22.29: What was the appointment period for the relevant roles?

Question 22.30: Which institution financed the appointments?

Question 22.31: What reporting arrangements applied?

Question 22.32: What research outputs were produced?

Question 22.33: How can members of the public access those outputs?

Question 22.34: What institutional restrictions applied to external professional activities?

Question 22.35: What further records can be made available to clarify the responsibilities of the relevant personnel?

The enquiry should not demand unrelated private employment information.

22.44. Consolidated questions: professional and external organisations

Where appropriate, Black History Studies and Building Trust Consortium should be asked separately:

Question 22.36: Did your organisation undertake any commissioned work associated with Project Spire?

Question 22.37: If so, which institution commissioned the work?

Question 22.38: What services were provided?

Question 22.39: What period did the work cover?

Question 22.40: Was the arrangement contractual, voluntary or otherwise organised?

Question 22.41: Did your organisation possess any formal governance responsibility concerning Project Spire?

Question 22.42: Did your organisation possess any authority over the proposed £100 million fund?

Question 22.43: What relevant external affiliations were disclosed under applicable institutional policies?

Question 22.44: Was there any formal financial relationship between Project Spire and the Global Reparations Hub?

Question 22.45: Can your organisation provide documentary clarification of the boundaries between these activities?

No response should be treated as an admission of a relationship that has not been established.

22.45. Consolidated questions: Oversight Group and consultation

The relevant Oversight Group representatives or authorised institutional custodian should be asked:

Question 22.46: What original consultation methodology was adopted?

Question 22.47: Does the reported participation figure of 1,106 represent unique individuals?

Question 22.48: Which categories of grassroots reparations organisations were approached?

Question 22.49: How were participating organisations selected?

Question 22.50: How were dissenting views recorded?

Question 22.51: What methodology was used to determine consultation priorities?

Question 22.52: Which recommendations were adopted?

Question 22.53: What procedures exist for continuing consultation?

Question 22.54: How does the programme distinguish consultation from consent and representation?

Question 22.55: What opportunities remain for independent organisations that were not involved in the original consultation?

22.46. Consolidated questions: safeguards

RNL should seek written answers to the following questions from the responsible institutions.

Question 22.56: Do you acknowledge the possibility of anti-Black racism, racial bias and Institutional Racism within the relevant decision-making processes?

Question 22.57: What safeguards exist to prevent those risks?

Question 22.58: What evidence demonstrates that the safeguards operate in practice?

Question 22.59: Who independently reviews the safeguards?

Question 22.60: What complaints and appeal mechanisms are available?

Question 22.61: How can a Black person or independent organisation obtain written reasons for a decision?

Question 22.62: What protections exist against victimisation for raising concerns?

Question 22.63: What measures prevent unequal access to consultation, contracts and funding?

Question 22.64: What procedures identify and manage conflicts of interest?

Question 22.65: Will the institution publish a consolidated safeguards framework with supporting documents?

These questions concern the possibility of discriminatory outcomes and the effectiveness of protections.

They are not allegations of proven wrongdoing.

22.47. Required disclosure schedule

RNL should maintain the following consolidated documentary requirements.

Document group	Records required	Primary custodian
Historical research	Terms of reference, original reports, archival source references	Church Commissioners / relevant archive
Financial commitment	Board decision and £100 million calculation rationale	Church Commissioners
Legal authority	Registration applications, section 106 application, decisions and conditions	Church Commissioners / Charity Commission
Governance	Terms of reference, governing documents, delegation schedules	Church Commissioners / proposed fund
Oversight Group	Appointment records, recommendations, continuing status	Church Commissioners
Consultation	Methodology, anonymised participation data, subsequent engagement reports	Church Commissioners / relevant programme custodian
Preparatory expenditure	Annual cost breakdown, contracts and professional fees	Church Commissioners
Appointments	Institutional role descriptions, commissioning records and authority	Church Commissioners / Lambeth Palace Library
Financial transactions	Transfers, investments, grants and verified receipts	Responsible fund or asset holder
Safeguards	Equality, anti-racism, complaints and conflict-of-interest policies	Each responsible institution
External relationships	Contracts, grants, memoranda and formal institutional agreements, if any	Relevant parties
Communications	Material notices, corrections, policy changes and response records	Each responsible institution

The schedule should be revised as new evidence is identified.

22.48. Priority One: establish current legal and financial status

The first practical stage should be to obtain a current written statement from the Church Commissioners concerning the legal and financial status of Project Spire.

This should establish whether the proposed fund has been registered, whether regulatory authorisation has been obtained and whether any of the £100 million has been transferred.

It should also identify the responsible governing body.

These questions are foundational.

Without them, later enquiries concerning grants, investments and beneficiaries may be confused by uncertainty about whether the proposed fund is operational.

The initial response should therefore provide the most recent position, not merely repeat historical announcements.

22.49. Priority Two: obtain a complete money trail

The second stage should seek a financial reconciliation from 2019 through the latest available reporting date.

This should include the approximate £1 million expenditure figure and all later spending.

It should identify the treatment of internal staff costs, professional fees, consultancy, research and administration.

The original £100 million commitment must remain separate.

The reconciliation should also identify actual transfers, investments and grants, if any.

Where no such transactions have occurred, the institution should confirm that position.

The objective is to establish a complete financial chronology.

22.50. Priority Three: clarify governance and professional roles

The third stage should obtain an updated governance structure and a professional appointments register.

The investigation should identify which persons possess advisory responsibilities and which possess formal authority.

The documented archival role of Kwesi Ochosi should be clarified with the responsible institution.

Charmaine Simpson's research and engagement responsibilities should also be clarified.

Any formal relationship with external reparations organisations should be documented.

The purpose is not to imply wrongdoing.

It is to identify responsibility accurately.

22.51. Priority Four: examine consultation and safeguards

The fourth stage should examine the original consultation and continuing community-engagement arrangements.

RNL should identify what records exist concerning the 1,106 reported participants.

It should also establish whether longstanding independent grassroots organisations had reasonable opportunities to contribute.

The Commissioners should provide evidence of safeguards against anti-Black racism and Institutional Racism.

The investigation should examine not only written policies but also the means by which they are implemented and reviewed.

The objective is transparent and accountable participation.

22.52. Priority Five: establish any genuine Project Spire–GRH relationship

The fifth stage should establish whether Project Spire and the Global Reparations Hub possess any formal relationship beyond documented professional overlap.

Relevant evidence may include contracts, funding arrangements, governing agreements or official correspondence.

If no such relationship exists, the responsible institutions should confirm that position.

If a relationship exists, its scope should be identified precisely.

The separate GRH investigation should retain responsibility for questions concerning the GRH's own formation and launch.

This avoids unnecessary institutional confusion.

22.53. Priority Six: give all relevant parties a fair right of reply

Before any final conclusions concerning disputed conduct are published, the relevant institutions and individuals should receive an accurate statement of the findings proposed.

They should be invited to correct errors and provide relevant documents.

RNL should distinguish a factual correction from a competing interpretation.

Where evidence remains contested, the final report should state the dispute and explain why a conclusion can or cannot be reached.

The purpose is fair, independent assessment.

22.54. Priority Seven: independent verification

The investigation should independently verify material claims wherever practicable.

This may involve parliamentary records, Charity Commission entries, annual financial statements, original research documents and archival records.

Where an institution provides information not otherwise publicly available, the source and limitations should be documented.

Where independent verification is not possible, the claim should remain attributed.

The investigation should not describe an official statement as an independently verified outcome merely because it was issued by the responsible institution.

22.55. Priority Eight: produce the final institutional findings

The final stage should be undertaken only after the relevant evidence and responses have been examined.

The findings should distinguish matters established, matters contested, matters not established and matters requiring future monitoring.

Each conclusion should identify the supporting evidence.

Recommendations should follow from those findings.

The report should not infer guilt, deception or discriminatory intent from unresolved questions.

Nor should it disregard documentary evidence of significant institutional relationships.

The objective is an accurate public reference record capable of supporting responsible debate.

22.56. The consolidated action register

Action ID	Required action	Priority	Status
SPIRE-A01	Obtain current Church Commissioners legal-status statement	Immediate	Outstanding
SPIRE-A02	Confirm fund registration and regulatory authorisation	Immediate	Outstanding

SPIRE-A03	Obtain £100 million financial-status reconciliation	Immediate	Outstanding
SPIRE-A04	Obtain preparatory expenditure breakdown for 2019–2026	High	Outstanding
SPIRE-A05	Obtain current Project Spire governance chart	High	Outstanding
SPIRE-A06	Clarify continuing Oversight Group authority	High	Outstanding
SPIRE-A07	Obtain professional appointments and contracts information	High	Outstanding
SPIRE-A08	Confirm archival roles and institutional reporting lines	High	Outstanding
SPIRE-A09	Clarify external organisational financial relationships	High	Outstanding
SPIRE-A10	Obtain consultation methodology and continuing-engagement record	High	Outstanding
SPIRE-A11	Obtain project-specific anti-racism and Institutional Racism safeguards	Immediate	Outstanding
SPIRE-A12	Identify independent complaints and review mechanisms	Immediate	Outstanding
SPIRE-A13	Preserve parliamentary questions and responses	Continuing	In progress
SPIRE-A14	Preserve historical research and original source references	Continuing	In progress
SPIRE-A15	Establish documentary disclosure register	High	To be completed
SPIRE-A16	Establish response and corrections registers	High	To be completed
SPIRE-A17	Verify any financial transfers, investments and grants	Continuing	Outstanding

SPIRE-A18	Invite institutional corrections and right of reply	High	To be issued
SPIRE-A19	Maintain separation from GRH and Black Cultural Centre reports	Continuing	Required
SPIRE-A20	Prepare evidence-based final findings and recommendations	Final stage	Not yet undertaken

These statuses concern the work of this independent investigation.

They are not statements that the responsible institutions have failed to undertake their own activities.

22.57. The response and correspondence register

Every formal enquiry should receive a correspondence identifier.

The register should identify the recipient, date sent, questions included and supporting documents.

Any response should be preserved in its original form.

The register should record whether the response was complete, partial, declined or referred elsewhere.

Outstanding matters should be carried forward.

Where a question has been fully answered, it should not be repeatedly presented as unresolved.

Where the answer becomes outdated because of subsequent developments, the original response should remain preserved alongside the update.

This will support clarity and prevent unnecessary confusion.

22.58. The need for regular evidence review

Project Spire continues to develop.

Legal authorisations may be granted or refused.

A new charity may become operational.

Governance arrangements may change.

Financial resources may be transferred or invested.

Public opposition and legal challenges may also develop.

The investigation should therefore maintain a process for reviewing new evidence.

However, new material should not automatically overwrite earlier records.

The historical sequence should remain visible.

This will permit future readers to distinguish what was known at a particular time from what became known later.

22.59. The principle of no arbitrary limits

RNL's investigation is intended to examine the relevant evidence comprehensively.

The scope should be determined by the material questions and documentary records rather than an arbitrary page limit.

Where a shorter document is useful, it may be prepared as an executive briefing.

Where institutions prefer a shorter question schedule, questions may be grouped by subject and priority.

However, the permanent report should retain the complete investigative record.

Conciseness should improve access without removing substantive questions.

The objective is clarity, not dilution.

22.60. The role of a public executive briefing

A shorter public briefing may assist people who do not have time to read the entire report.

Such a briefing should identify the principal established facts, outstanding questions and immediate action required.

However, it should not claim to replace the full documentary investigation.

It should direct readers to the original evidence and relevant sections.

Where a finding is provisional, the briefing should preserve that qualification.

Where a matter is disputed, the briefing should identify the dispute.

The objective is to make the investigation accessible without misrepresenting its conclusions.

22.61. The importance of independent legal and financial expertise

Some Project Spire questions involve specialist legal and accounting matters.

These include charitable powers, regulatory authorisation, historic financial valuation, investment structures and professional contracts.

RNL should seek appropriate expert input where the evidence requires it.

However, expert opinion should be distinguished from established fact.

An opinion should identify the evidence considered and any limitations.

Where experts disagree, the disagreement should be examined rather than concealed.

The investigation should not treat an expert's professional status alone as proof that every conclusion is correct.

The objective is reliable analysis.

22.62. Independent historical expertise

The original historical research identified significant financial connections between Queen Anne's Bounty and African chattel enslavement.

Some interpretations have been publicly contested.

The investigation should preserve the original research and relevant scholarly criticisms.

Where necessary, independent historical expertise may assist in evaluating disputed points.

However, the investigation must distinguish the existence of documented investments from disagreement about their precise financial significance.

The original evidence should remain the foundation.

The purpose is to improve understanding rather than select interpretations according to predetermined preferences.

22.63. The role of community evidence

Affected communities may possess records, historical knowledge and firsthand accounts relevant to the programme.

Such material may assist in identifying consultation gaps, communication difficulties or the practical consequences of institutional decisions.

However, different forms of evidence should be treated according to their nature.

A firsthand account may establish what a person observed.

It may not establish another person's intention.

A community concern may identify a legitimate question.

It does not automatically prove misconduct.

The investigation should welcome relevant evidence while preserving these distinctions.

22.64. The right of respondents to correct the record

The Church Commissioners, relevant researchers, external organisations and other identified respondents should be able to correct inaccurate descriptions.

Where a professional role is misidentified, the correction should be incorporated.

Where a financial claim is unsupported, the evidential status should be amended.

Where a document changes the chronology, the report should be updated.

The original record should remain traceable.

RNL should not regard correction as defeat or obstruction.

Accuracy is the purpose of the investigation.

22.65. Safeguards for the independence of RNL

RNL must remain responsible for its own conclusions.

Cooperation with an institution should not give that institution editorial control over the report.

Similarly, an institution's refusal to cooperate should not justify unsupported findings.

RNL should examine evidence supplied by all relevant parties.

It should maintain a transparent methodology.

It should also disclose material limitations that affect its conclusions.

Independence requires both freedom from inappropriate institutional control and responsibility for the accuracy of the resulting work.

22.66. Preventing the investigation from becoming a source of conflict

The investigation concerns historically sensitive matters.

Disagreement may arise over the adequacy of reparatory commitments, governance, institutional responsibility or the interpretation of evidence.

RNL considers it essential that these disagreements be addressed through lawful, peaceful and professional procedures.

The possibility of intimidation, threats of violence or violence must be considered as a preventative concern.

This does not mean that violence is expected.

It does not attribute violent intentions to any party.

The investigation must itself avoid conduct that could encourage intimidation or unsupported personal targeting.

Its purpose is to clarify facts, strengthen accountability and reduce avoidable conflict.

22.67. The final report's evidential standards

The completed investigation should distinguish clearly between:

- Historical facts established by original records.
- Institutional statements supported by official publications.
- Independent corroboration.
- Attributed firsthand accounts.
- Competing interpretations.
- Suspicions requiring investigation.
- Matters that remain unverified.
- Findings that can responsibly be made.
- Recommendations for future action.

The categories should be applied consistently.

Where evidence is insufficient, the report should say so.

Where evidence supports a finding, the report should identify its basis.

The absence of a conclusion should not be misrepresented as the absence of a legitimate question.

22.68. Preliminary conclusions from the consolidated action plan

The investigation has established a substantial historical and institutional foundation for Project Spire.

The Church Commissioners' research identified financial connections between Queen Anne's Bounty and African chattel enslavement.

The Commissioners announced a £100 million response.

An independent Oversight Group was appointed and published recommendations.

The programme developed workstreams concerned with governance, investment, grants and theology.

Public records identify professional appointments and archival research.

The Commissioners have published substantial information and responded to parliamentary questions.

These facts are documented.

However, the complete financial position, regulatory status, final governance structure, professional contractual arrangements and effectiveness of anti-racism safeguards remain subject to further examination.

The documented participation of certain Project Spire-related personnel in GRH activities establishes a legitimate reason to seek institutional clarification.

It does not establish shared governance or financial control.

The investigation should therefore proceed through targeted written enquiries and documentary verification.

22.69. Conclusion: the investigation now requires formal institutional answers

Project Spire has moved from its initial questions concerning possible institutional overlap to a substantial documentary investigation of historical financial responsibility and the proposed reparatory response.

The evidence already identified permits more precise questions.

The appropriate next stage is to obtain formal written answers from the institutions responsible.

The Church Commissioners should be asked to clarify legal status, expenditure, governance, professional appointments, consultation, safeguards and actual reparatory delivery.

The Charity Commission should be approached about regulatory matters within its authority.

Lambeth Palace Library should be asked to clarify archival responsibilities and relevant institutional records.

External organisations should be invited to explain only their own documented activities and any formal relationships requiring verification.

The investigation should preserve institutional boundaries and avoid unsupported associations.

It should also preserve RNL's express position concerning the possibility of anti-Black racism and Institutional Racism without converting that concern into an allegation of proven misconduct.

The central conclusion of Section 22 is that Project Spire now possesses a sufficiently developed documentary foundation to justify a formal, coordinated programme of institutional enquiries, disclosure requests, independent verification, fair rights of reply and continuing evidence preservation.

The objective is to establish what can be proved, identify what remains unresolved and ensure that future conclusions are supported by reliable records.

RNL seeks professional organisation, transparent accountability, meaningful community participation, effective institutional safeguards and the peaceful advancement of reparatory justice.

SECTION 22 — CONSOLIDATED INVESTIGATIVE EVIDENCE REGISTER

Evidence ID	Matter	Evidential status
SPIRE-22-001	Original historical financial research	Published primary records
SPIRE-22-002	Original £100 million commitment	Official institutional announcement
SPIRE-22-003	Oversight Group appointments and recommendations	Published official records
SPIRE-22-004	Project Spire implementation workstreams	Published institutional update
SPIRE-22-005	Consultation participation figures	Published institutional records
SPIRE-22-006	Legal and regulatory statements	Parliamentary and institutional records
SPIRE-22-007	Approximately £1 million preparatory expenditure through December 2024	Parliamentary statement
SPIRE-22-008	Current complete expenditure reconciliation	Outstanding
SPIRE-22-009	Current complete regulatory chronology	Further verification required

SPIRE-22-010	Complete governance and delegation structure	Further verification required
SPIRE-22-011	Kwesi Ochosi Project Spire archival role	Documented professional role
SPIRE-22-012	Charmaine Simpson research and engagement role	Published professional role
SPIRE-22-013	Participation of relevant personnel in GRH activities	Published event records
SPIRE-22-014	Formal financial relationship between Project Spire and GRH	Not established
SPIRE-22-015	Complete professional appointments and contracts register	Outstanding
SPIRE-22-016	Complete consultation and continuing-engagement record	Further evidence required
SPIRE-22-017	Project-specific safeguards against anti-Black racism and Institutional Racism	Documentary verification required
SPIRE-22-018	Effective independent complaints and review arrangements	Further verification required
SPIRE-22-019	Verified reparatory payments and outcomes	Not established from reviewed evidence
SPIRE-22-020	Formal institutional right-of-reply process	To be undertaken
SPIRE-22-021	Consolidated disclosure schedule	Prepared in principle; responses outstanding
SPIRE-22-022	Independent final findings	Not yet determined

SOURCES AND INDEPENDENT VERIFICATION

Source 22.1 — Church Commissioners: Historical Links to African Chattel Enslavement

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/church-commissioners-links-african-chattel-enslavement

Evidence: Institutional research history and response.

Source 22.2 — Church Commissioners: Related Documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Evidence: Research reports, Oversight Group documents and consultation materials.

Source 22.3 — Church Commissioners: Frequently Asked Questions

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Evidence: Institutional explanations concerning fund design, governance, consultation and financial arrangements.

Source 22.4 — Church Commissioners: Public Enquiries

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Published public contact process, 30-working-day response aim and operational-status statement.

Source 22.5 — Oversight Group Report

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Evidence: Recommendations concerning governance, investment, grants, Black community leadership and consultation.

Source 22.6 — Church Commissioners: Implementation Update, March 2025

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

Evidence: Programme workstreams and implementation development.

Source 22.7 — UK Parliament: Financial Status, September 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

Evidence: Original commitment retained in general fund pending authorisation at that reporting date.

Source 22.8 — UK Parliament: Project Spire Expenditure

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

Evidence: Approximately £1 million expenditure through December 2024 and accounting limitations.

Source 22.9 — UK Parliament: Regulatory Discussions

https://questions-statements.parliament.uk/written-questions/detail/2025-04-22/47118/

Evidence: Proposed section 106 authorisation and the distinction between discussions and formal applications.

Source 22.10 — Charity Commission Register

https://register-of-charities.charitycommission.gov.uk/

Evidence: Verification of charity registration and published governance information where applicable.

Source 22.11 — Church Commissioners' Annual Reports

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

Evidence: Institutional financial reporting.

Source 22.12 — Lambeth Palace Library

https://www.lambethpalacelibrary.info/

Evidence: Institutional archive and contact route for relevant research records.

Source 22.13 — UK Reparations Conference 2026 Agenda

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Evidence: Publicly documented GRH launch participants and event arrangements. Cross-reference only.

Source 22.14 — Church Commissioners' Response to Parliamentarians, January 2026

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Evidence: Institutional response to legal, financial and governance concerns.

Source 22.15 — Charity Commission Trustee Decision-Making Guidance

https://www.gov.uk/government/publications/its-your-decision-charity-trustees-and-decision-making

Evidence: General framework for responsible charitable governance.

END OF SECTION 22 — FORMAL INVESTIGATIVE QUESTIONS, DOCUMENTARY DISCLOSURE, INSTITUTIONAL RESPONSIBILITY, RIGHT OF REPLY AND THE CONSOLIDATED ACTION PLAN

NEXT: SECTION 23 OF 24 — PRELIMINARY FINDINGS, EVIDENTIAL LIMITATIONS, COMPETING EXPLANATIONS, INSTITUTIONAL RESPONSES, RISK ASSESSMENT AND THE REQUIREMENTS FOR RESPONSIBLE FINAL CONCLUSIONS.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 23 OF 24

PRELIMINARY FINDINGS, EVIDENTIAL LIMITATIONS, COMPETING EXPLANATIONS, INSTITUTIONAL RESPONSES, RISK ASSESSMENT AND THE REQUIREMENTS FOR RESPONSIBLE FINAL CONCLUSIONS

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Investigation status: Substantial documentary findings established. Material questions concerning institutional relationships, regulatory authority, financial delivery, community participation, professional accountability and safeguards remain unresolved. No final findings of wrongdoing have been made.

23.1. Purpose of this section

This section brings together the principal findings, limitations and competing explanations developed throughout the Project Spire investigation.

It does not attempt to replace the detailed evidence examined in Sections 1–22.

Its purpose is to establish what can presently be said with confidence, what remains open to interpretation, what evidence is still required and what standards should govern the investigation's final conclusions.

The original investigation arose from questions and community concerns about possible connections between Church-related reparatory activity, Project Spire, particular individuals and the Global Reparations Hub.

Subsequent research identified substantial documentary evidence concerning the Church Commissioners for England's historical financial connections with African chattel enslavement and the proposed £100 million Fund for Healing, Repair and Justice.

It also established specific professional roles and overlapping involvement in other reparations initiatives.

However, those findings must not be transformed into unsupported conclusions about motives, institutional control, financial relationships or wrongdoing.

RNL's task is to distinguish what the documents establish from what they merely raise as a question.

The investigation must also recognise the existence of competing interpretations concerning historical responsibility, charitable authority, reparatory adequacy, governance and community participation.

These interpretations should be assessed according to their evidential foundations.

The purpose is to prepare for responsible final conclusions rather than announce them prematurely.

23.2. The investigation's central evidential position

The investigation has established that Project Spire is a genuine Church Commissioners initiative developed in response to historical research.

It has established that the Commissioners announced a £100 million financial commitment.

It has established that an independent Oversight Group developed recommendations concerning a proposed Fund for Healing, Repair and Justice.

It has established that the programme involves historical research, engagement, legal preparation and governance development.

It has also identified published evidence of professional roles associated with Project Spire and separate reparations-related initiatives.

However, the investigation has not established that Project Spire and the Global Reparations Hub share governance or finances.

It has not established that the GRH received Project Spire funding.

It has not established the complete financial history of Project Spire through October 2026.

It has not established that the proposed £100 million has been paid to affected communities.

It has not obtained sufficient evidence to reach final conclusions concerning the effectiveness of safeguards against anti-Black racism and Institutional Racism.

These distinctions govern every subsequent assessment.

23.3. RNL's formal declaration

RNL's position remains:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

These statements should be read together.

The investigation identifies concerns and seeks evidence.

It does not presume that the concerns have already been proved.

The possibility of anti-Black racism, racial bias or Institutional Racism must not be dismissed merely because no discriminatory finding has yet been made.

Equally, the possibility must not be presented as a proven event.

The appropriate institutional response is to identify the safeguards that exist and provide evidence of their application.

23.4. The distinction between preliminary and final findings

A preliminary finding identifies what the evidence currently supports.

It may be revised when new documents, institutional explanations or corrections become available.

A final finding should be made only after the relevant evidence has been evaluated and material affected parties have had an appropriate opportunity to respond.

This distinction is particularly important where the investigation concerns named people and organisations.

A published appointment may establish that someone held a professional role.

It does not necessarily establish the extent of their authority or financial remuneration.

A parliamentary answer may establish an official institutional position.

It may not answer every question concerning the underlying accounts.

A community report may establish that a concern was expressed.

It does not necessarily establish the truth of every factual proposition contained in the report.

The final conclusions must preserve these distinctions.

23.5. Finding One: Project Spire's institutional origin

The Church Commissioners' historical research was initiated in 2019.

The research examined the origins of the Commissioners' endowment, including Queen Anne's Bounty and its financial connections with African chattel enslavement.

The Commissioners publicly acknowledged historical findings in 2022 and published the fuller research report in January 2023.

These matters are documented.

The programme's institutional origin is therefore established independently of later community rumours concerning the GRH.

Project Spire did not originate as an initiative of the Global Reparations Hub.

Nor has the investigation established that the GRH created or controlled the Church Commissioners' original research.

The Church Commissioners remain the principal institution responsible for explaining Project Spire's origin and development.

23.6. Finding Two: historical financial connections

The published forensic research identified Queen Anne's Bounty's South Sea Company-related investments and income.

It also examined benefactions associated with individuals whose wealth may have been connected with African chattel enslavement.

These findings provide the historical foundation for the Commissioners' subsequent response.

However, the investigation must distinguish the existence of documented historical investments from the precise present-day value of financial benefit.

The published research includes monetary comparisons that require careful interpretation.

The historical connection is documented.

The complete present-day financial tracing and precise valuation of any continuing benefit remain more difficult questions.

Those limitations should not be used either to dismiss the historical evidence or to manufacture unsupported figures.

23.7. Finding Three: the original £100 million commitment

The Church Commissioners announced a £100 million commitment in January 2023.

This is a documented institutional undertaking.

The programme was intended to include impact investment, research and engagement, with the possibility of future grant-making.

However, the commitment must not be described as £100 million already received by Black/Afrikan communities.

The proposed financial model is not the same as direct individual compensation.

It also remains necessary to establish the complete process through which the original amount was selected.

The existence of the commitment is established.

Its full calculation and subsequent financial deployment remain matters for further examination.

23.8. Finding Four: the Oversight Group's larger ambition

The independent Oversight Group considered the original £100 million commitment insufficient and recommended developing the programme towards £1 billion or more.

The Commissioners publicly maintained that their own financial commitment remained £100 million.

This establishes a documented difference between the original commitment and the wider ambition.

The £1 billion figure must not be described as capital already secured or distributed.

Nor should it automatically be treated as a second commitment made by the Commissioners.

The investigation should examine the basis for the larger ambition and any subsequent institutional contributions.

The distinction between committed, projected and delivered resources remains essential.

23.9. Finding Five: legal and regulatory preparation

Parliamentary records establish that the Commissioners considered their legal and charitable obligations.

They identified the need for the proposed registration of a separate charity and appropriate regulatory authorisation.

They also identified a possible application under section 106 of the Charities Act 2011 concerning an ex gratia payment based upon moral obligation.

These are documented legal steps.

However, the Board's original decision to commit £100 million is not equivalent to completed regulatory authorisation.

Likewise, the authorisation of an application is not equivalent to approval of that application by the regulator.

The investigation must establish the actual status of each step.

The Commissioners' current public information describes the proposed fund as remaining under development.

23.10. Finding Six: the proposed fund is not established as operational

The Church Commissioners' official public information continues to describe the Fund for Healing, Repair and Justice as being in the process of establishment.

The FAQ explains that grants are not yet available and that further information will be published.

This is relevant to the investigation's assessment of reparatory delivery.

However, the term *not operational* does not necessarily establish that no preparatory expenditure has occurred.

Nor does it automatically establish that no legal or administrative steps have been completed.

The correct position is that the fund's publicly stated operational status remains incomplete.

A current regulatory and financial reconciliation is required before more precise conclusions can be reached.

23.11. Finding Seven: preparatory expenditure

The Commissioners reported approximately £1 million in Project Spire-related expenditure from 2019 through December 2024.

The figure included forensic accounting, risk management, consultation, engagement events, communications, governance and ancillary costs.

It excluded internal staff time.

This is a documented aggregate expenditure figure.

However, it is not a complete project-cost statement through October 2026.

It does not identify every supplier or contract.

It does not include a precise valuation of internal staff resources.

The investigation must therefore seek subsequent expenditure records and appropriate reconciliation.

The existence of preparatory expenditure does not itself establish improper financial activity.

23.12. Finding Eight: disputed expenditure claims

Parliamentary questions raised claims that £5 million had already been spent on Project Spire.

The Commissioners rejected that amount.

A separate question referred to an alleged £5 million forecast for the 2026–28 triennium.

The Commissioners also disputed that figure.

These disagreements are documented.

The investigation must therefore preserve the original claims and the Commissioners' responses.

It should not treat the disputed amounts as established expenditure.

Equally, the rejection of the figures does not eliminate the need for a complete financial statement.

The appropriate next step is to obtain the actual figures supported by institutional accounting records.

23.13. Finding Nine: documented professional appointments

Published records identify professionals involved in Project Spire-related historical research, archival work and engagement.

Grant Thornton's forensic accounting role is documented.

Academic historians contributed to the historical research.

Lambeth Palace Library records identify archival research involving Dr Annabelle Gilmore and Kwesi Ochosi.

A September 2026 publication explicitly identifies Kwesi Ochosi as Project Spire Coordinator: Archives.

Published Church-related material also identifies Charmaine Simpson in a research and engagement role.

These are substantive documentary findings.

However, the complete contractual arrangements and financial authority of the named individuals remain separate questions.

23.14. Finding Ten: overlapping external professional activities

Published event records identify Charmaine Simpson and Kwesi Ochosi in GRH-related activities.

Their involvement in Project Spire-related work is also documented.

This establishes overlapping professional participation across the relevant settings.

However, overlapping participation does not prove common institutional control.

It does not establish that the Church Commissioners commissioned the GRH launch.

It does not establish that the GRH received Project Spire funding.

It does not establish an improper conflict of interest.

Those matters require independent documentary verification.

The investigation must not exaggerate the significance of the overlap.

Nor should it disregard a documented connection merely because its wider implications remain uncertain.

23.15. Finding Eleven: consultation took place

The Church Commissioners report that 1,106 people participated through combined engagement events and a global survey during 2023.

The Oversight Group's report identifies engagement in England, Jamaica, Barbados and Ghana.

It also describes geographical participation and priorities raised by respondents.

These are documented consultation activities.

However, the figure does not establish that every relevant grassroots reparations organisation participated.

It does not establish unanimous agreement.

It does not establish that respondents possessed a mandate to represent the entire global African diaspora.

The investigation should therefore distinguish consultation from representation and consent.

23.16. Finding Twelve: governance recommendations remain distinct from implemented powers

The Oversight Group recommended substantial Black community leadership and eventual ownership of the proposed fund.

The Commissioners accepted the Group's recommendations and established implementation workstreams.

These are documented institutional developments.

However, the investigation has not obtained a complete current governance structure establishing the final distribution of authority.

The proposed legal entity, trustee appointment powers, investment authority and community accountability arrangements require clarification.

The existence of an advisory group does not automatically establish community ownership of assets.

The distinction between aspiration and implementation must remain clear.

23.17. Finding Thirteen: racial-justice commitments exist

The Church of England has published a substantial institutional racial-justice framework.

The Archbishops' Anti-Racism Taskforce and subsequent Archbishops' Commission for Racial Justice examined systemic racism and institutional reform.

The Commission also publicly addressed Project Spire.

These facts establish that racial-justice concerns have been formally recognised within the wider Church.

However, the existence of a Church-wide framework does not establish that every Project Spire decision is protected by effective, independently tested safeguards.

The investigation must therefore seek project-specific evidence.

This is an unresolved safeguards question, not a finding of discriminatory wrongdoing.

23.18. Finding Fourteen: public information is available

The Church Commissioners maintain official webpages containing historical research, FAQs, Oversight Group materials and related institutional statements.

They also invite public enquiries and publish a response aim of 30 working days.

Parliamentary questions have produced further written information.

These are positive documentary features of institutional transparency.

However, the investigation has not established that every material question receives a complete response.

Nor has it obtained a comprehensive current disclosure register covering all contracts, expenditures and regulatory decisions.

The existence of public information is established.

Its completeness and effectiveness remain open to examination.

23.19. The evidential limitations of institutional statements

An official institutional statement is evidence of the position adopted by the institution.

However, it may not independently establish every factual proposition underlying that position.

For example, a statement that a programme is progressing lawfully does not necessarily reproduce every relevant legal document.

A statement that costs are proportionate does not provide a complete expenditure ledger.

A statement that consultation occurred does not identify every participant.

The investigation should therefore use official statements accurately while recognising their scope.

Where a statement contains a verifiable factual proposition, the supporting record should be sought where proportionate.

Institutional authority matters.

So does independent verification.

23.20. The evidential limitations of parliamentary answers

Parliamentary answers are important public records.

They identify official positions at specific dates.

However, an answer may respond narrowly to the wording of a question.

It may also become outdated as circumstances change.

For example, an answer stating that regulatory authorisation had not yet been obtained in September 2025 does not automatically establish the position in October 2026.

Similarly, a response concerning expenditure through December 2024 does not establish total expenditure through a later period.

The investigation must therefore preserve the date and scope of each answer.

Later developments should be recorded separately.

23.21. The evidential limitations of published professional biographies

A biography may accurately identify someone's professional role.

However, it may not contain the complete employment or consultancy arrangement.

It may omit dates, supervisory relationships, budgetary authority and contractual details.

The investigation should therefore use biographies as evidence of the role described, not as proof of additional powers.

For example, the public description of Kwesi Ochosi as Project Spire Coordinator: Archives supports the existence of an archival coordination role.

It does not establish authority over the £100 million commitment.

The same distinction applies to research and engagement positions.

Professional titles must not be expanded beyond what the evidence supports.

23.22. The evidential limitations of community accounts

Community accounts may identify concerns that institutions have not adequately addressed.

They may also provide firsthand information concerning meetings, communications or events.

Such accounts can be important investigative leads.

However, the evidence should be assessed according to what the person directly experienced or observed.

A person may report that they did not receive an invitation.

That does not establish that no other community organisation was invited.

A participant may describe confusion concerning a venue change.

That does not establish why the change occurred.

An individual may suspect an organisational relationship.

That does not establish a formal contract or financial link.

The investigation should preserve attributed accounts without turning them into unsupported universal findings.

23.23. Competing explanation One: ordinary professional overlap

One possible explanation for the documented overlap between Project Spire-related personnel and the GRH is that experienced reparations researchers participate in several initiatives.

This may arise because the relevant professional field contains overlapping interests and expertise.

A researcher may contribute to Church-related historical work while independently supporting another reparations project.

Such participation may be entirely legitimate.

The existence of this explanation does not establish that it is the complete explanation of every relationship.

It does, however, demonstrate why shared personnel alone cannot prove common institutional control.

The investigation must therefore seek actual contracts, authorisations and financial records.

23.24. Competing explanation Two: formal institutional collaboration

A second possibility is that some activities involved formal collaboration between institutions.

Such collaboration might take the form of an agreement, research partnership, commissioned service or authorised event participation.

If this occurred, the relationship should be supported by documents.

The existence of a formal collaboration would not automatically be improper.

Its significance would depend upon its purpose, authority, financial terms and safeguards.

The investigation has not established that the Church Commissioners formally partnered with the GRH.

The possibility remains an investigative question.

It must not be presented as a finding.

23.25. Competing explanation Three: informal professional cooperation

A third possibility is that individuals cooperated informally without creating a formal institutional relationship.

For example, people working in related fields may exchange information, attend events or invite one another to speak.

Such cooperation may create visible associations while leaving the relevant institutions legally and financially separate.

The investigation should distinguish informal contact from official representation.

A public event programme may identify a person's name without specifying whether they attended personally or on behalf of an employer.

The appropriate next step is to clarify the capacity in which the individual participated.

No improper arrangement should be presumed.

23.26. Competing explanation Four: misunderstanding of institutional authority

A further possibility is that public communications created confusion concerning institutional roles.

For example, a speaker may be publicly associated with one institution while participating in an event organised by another.

Observers may reasonably ask whether the first institution authorised the event.

However, the association may not involve any official delegation.

The investigation should therefore seek clear statements concerning institutional responsibility.

This could resolve uncertainty without requiring any allegation of misconduct.

The possibility of misunderstanding should be examined seriously because unclear communications can generate unnecessary public concern.

23.27. Competing explanation Five: a formally relevant conflict of interest

Another possibility is that a particular professional or organisational relationship created a conflict of interest requiring declaration or management.

However, the existence of that possibility is not evidence that an improper conflict occurred.

The investigation must first establish the relevant duties and interests.

It must then identify any actual decision affected.

It should determine whether disclosure, recusal or independent review occurred.

A properly declared and managed conflict may be compatible with lawful institutional governance.

Only the actual records can establish whether a problem arose.

23.28. Competing interpretations of historical financial responsibility

The Church Commissioners' historical research has attracted different interpretations.

The Commissioners consider the evidence sufficient to justify a reparatory response.

Some critics question the financial significance of the South Sea Company investment relationship or the interpretation of the historical records.

These disagreements require examination of the original evidence.

The fact that investments existed must be distinguished from the precise basis for attributing profits or financial benefit to enslavement.

Different monetary conversion methods may also produce different comparative figures.

The investigation should preserve both the original research and serious evidence-based criticism.

It should not treat disagreement as proof that either party has acted dishonestly.

23.29. Competing interpretations of the £100 million commitment

The £100 million commitment can be assessed from several perspectives.

The Church Commissioners present it as a significant institutional response.

The Oversight Group considered it insufficient and proposed a larger ambition.

Some critics question whether charitable resources should be allocated to the proposed programme at all.

Others may support the principle of reparatory justice while questioning the investment model or absence of direct compensation.

These perspectives concern different questions.

One concerns institutional affordability.

Another concerns historical responsibility.

Another concerns charitable law.

Another concerns delivery to affected communities.

The investigation should not collapse them into a single argument.

Each requires appropriate evidence.

23.30. Competing interpretations of legal authority

The Church Commissioners maintain that they intend to act within their legal powers.

They have identified a proposed regulatory route involving a new charity and ex gratia authorisation.

Opponents have challenged the legal basis of the programme.

Contemporary reporting in October 2026 describes a potential legal challenge.

However, the investigation has not established a final judicial decision declaring Project Spire unlawful.

The existence of legal opposition should therefore be recorded as opposition.

The Commissioners' confidence in their legal approach should be recorded as their institutional position.

The ultimate legal effect of any disputed transaction depends upon the applicable law, regulatory decisions and any relevant judicial determination.

23.31. Competing interpretations of community consultation

The Commissioners report a substantial consultation programme involving more than one thousand participants.

The Oversight Group describes engagement across several geographical regions.

These are documented activities.

However, the extent to which that process adequately represented the interests of the wider affected population remains open to interpretation.

A consultation may be substantial without being statistically representative.

An organisation may not have participated without that omission proving deliberate exclusion.

A participant may contribute views without endorsing the final programme.

The investigation should therefore assess consultation through methodology, accessibility, influence and continuing accountability.

23.32. Competing interpretations of Black community leadership

The Oversight Group recommended Black-led and community-owned governance.

These principles may be interpreted differently.

Some may consider a Black-majority trustee board sufficient.

Others may require community appointment rights, ownership of assets or representative accountability.

Still others may prioritise independent professional governance and transparent beneficiary access.

The investigation should determine what the Commissioners and the proposed fund mean by these terms.

It should then examine whether their implementation corresponds to the stated meaning.

The final assessment should be based upon actual governing documents rather than assumptions about terminology.

23.33. Competing interpretations of institutional delay

The proposed fund has remained under development for several years.

One possible explanation is that complex legal, charitable and financial arrangements require substantial preparation.

Another concern is that prolonged delay may undermine the programme's practical effectiveness or public confidence.

The existence of delay is a matter of chronology.

Its causes and consequences require further evidence.

The investigation should therefore obtain the original implementation timetable and subsequent revisions.

It should also identify regulatory and governance requirements that affected progress.

Delay should not automatically be labelled obstruction.

Nor should the need for legal preparation be treated as a complete explanation without supporting records.

23.34. The importance of distinguishing risk from proof

An institutional risk is a possibility that requires consideration.

It is not necessarily an event that has occurred.

For example, a potential conflict of interest may exist even where no improper decision was made.

A risk of unequal access may require safeguards even where no discriminatory outcome has been demonstrated.

A risk of financial misunderstanding may justify better reporting without establishing financial misconduct.

The investigation should therefore assess risks without presenting them as findings of wrongdoing.

This is especially important concerning anti-Black racism and Institutional Racism.

The existence of a possibility is sufficient to justify asking what safeguards exist.

It is not sufficient to justify declaring that discrimination occurred.

23.35. Risk category One: financial transparency

The investigation has identified outstanding questions concerning preparatory expenditure, professional fees and the current status of the £100 million commitment.

These create a transparency risk.

The risk is that members of the public may misunderstand the difference between money committed, money spent on programme preparation and money delivered to affected communities.

The appropriate safeguard is clear financial reconciliation.

That reconciliation should distinguish budgets, expenditure, transfers, investments, grants and verified outcomes.

The existence of incomplete public information does not automatically establish misuse of funds.

It establishes a need for further accounting evidence.

23.36. Risk category Two: governance ambiguity

The published material identifies the Church Commissioners' Board, Oversight Group and implementation workstreams.

However, the final governance structure of the proposed fund remains subject to verification.

This creates a risk of misunderstanding concerning authority.

Members of the public may assume that advisers possess decision-making powers they do not hold.

They may also assume that community participation is equivalent to legal ownership.

The appropriate safeguard is an updated governance chart supported by governing documents and delegation schedules.

The investigation should establish the actual powers of each relevant body.

23.37. Risk category Three: consultation and representation

The original consultation is documented.

However, questions remain concerning the reach of the process and the participation of independent grassroots organisations.

This creates a risk that consultation may be described more broadly than its methodology supports.

The appropriate safeguard is publication of the consultation methodology, participant categories, relevant limitations and continuing-engagement arrangements.

The institution should also distinguish participation from consent.

A disagreement concerning consultation should be addressed through evidence rather than presuming exclusion or universal endorsement.

23.38. Risk category Four: possible anti-Black racism and Institutional Racism

RNL specifically identifies the possibility of anti-Black racism, racial bias and Institutional Racism as a risk requiring safeguards.

The Church of England possesses a published racial-justice framework.

However, the investigation has not yet obtained sufficient evidence of the safeguards specifically governing Project Spire.

This is a material outstanding issue.

The appropriate response is to identify the relevant policies, responsibilities, assessments, complaints processes and independent review mechanisms.

The effectiveness of those arrangements should also be examined.

The absence of evidence supplied to RNL should not be described as proof that discrimination occurred.

Nor should it be treated as a reason to abandon the enquiry.

23.39. Risk category Five: conflicts of interest

The documented involvement of individuals in multiple reparations initiatives raises legitimate governance questions.

However, overlapping professional roles do not automatically establish improper conflicts.

The appropriate safeguard is a clear system of declarations, recusal and independent review where relevant.

The investigation should establish which policies apply to Project Spire personnel and advisers.

It should also identify whether any actual decisions involved relevant external interests.

Only then can the significance of a possible conflict be assessed.

The objective is to prevent inappropriate influence while avoiding unfair suspicion of legitimate professional activity.

23.40. Risk category Six: regulatory uncertainty

The proposed fund has required legal and regulatory preparation.

The precise status of relevant applications and authorisations must be established.

This creates a risk of public misunderstanding.

An institution may announce a financial commitment before obtaining authority to complete the proposed transfer.

That sequence is not automatically unlawful.

However, the public should understand which approvals remain necessary.

The appropriate safeguard is a dated regulatory chronology supported by official records.

The investigation should not describe preparatory work as completed authorisation.

23.41. Risk category Seven: communication failures

The Commissioners maintain public information pages and a contact mechanism.

However, the effectiveness of the communication arrangements has not been independently established.

This creates a risk that legitimate questions may remain unanswered or be misunderstood.

The appropriate safeguard is a clear response protocol.

Questions should be answered according to their actual wording.

Incomplete responses should be identified.

Corrections should be recorded.

Where information cannot be disclosed, the institution should explain the relevant restriction.

The objective is to reduce avoidable confusion.

23.42. Risk category Eight: threats of violence and conflict prevention

RNL considers it important to recognise the possibility of serious conflict arising from unresolved disputes concerning reparatory resources, historical responsibility and community representation.

The possibility of intimidation, threats of violence or violence should therefore be considered within responsible preventative planning.

This does not imply that affected communities are inherently dangerous.

It does not establish that any participant has made a threat.

It does not predict that violence will occur.

The appropriate response is professional organisation, transparent information, lawful complaints processes and fair opportunities for challenge.

Risk assessment should protect peaceful debate rather than suppress it.

23.43. An initial risk assessment table

Risk category	**Documented basis**	**Outstanding safeguard or evidence**
Financial transparency	Aggregate expenditure and commitment figures exist, but complete reconciliation is outstanding	Itemised financial reporting and independent verification
Governance ambiguity	Board, advisers and workstreams documented; final fund authority unclear	Governing documents and delegation schedule
Consultation limitations	Substantial consultation documented; representative scope requires assessment	Methodology, participation records and continuing engagement
Racial bias and Institutional Racism	Wider Church framework documented; project-specific operation unverified	Project-specific policies, risk assessment and independent scrutiny
Conflicts of interest	Overlapping professional activities documented	Applicable declarations and decision-specific conflict management
Regulatory uncertainty	Application and authorisation requirements documented	Current regulator-confirmed chronology

Communications	Public information channels documented	Response tracking, corrections and clear written answers
Conflict prevention	Historically sensitive subject and substantial proposed resources	Accessible grievance procedures and appropriate preventative arrangements

This table identifies matters for further investigation.

It does not assign blame or establish misconduct.

23.44. Requirements for a responsible finding of misconduct

A finding that an individual or organisation acted improperly requires evidence addressing the relevant conduct and duty.

The investigation should identify the specific action, the person or institution responsible, the applicable standard and the evidence supporting the alleged departure from that standard.

It should also consider relevant explanations and corrections.

Professional association alone is insufficient.

Public criticism alone is insufficient.

An unanswered question alone is insufficient.

A disputed interpretation alone is insufficient.

Where evidence does not support a conclusion, the matter should remain unresolved.

This standard protects the accuracy and fairness of the final report.

23.45. Requirements for a responsible finding concerning Institutional Racism

A finding concerning Institutional Racism requires careful identification of the institutional practice, outcome or pattern being examined.

It should consider relevant evidence concerning racial disadvantage, the applicable decision-making process and alternative explanations.

The investigation should not substitute a general statement about institutional history for evidence concerning a contemporary decision.

However, it should also recognise that Institutional Racism need not depend upon proof that an individual intended racial harm.

The relevant question may concern the operation and consequences of institutional systems.

Where evidence is insufficient, the investigation should report the outstanding risk and request safeguards.

It should not declare the risk resolved merely because no final finding has been made.

23.46. Requirements for a responsible finding concerning financial wrongdoing

Financial wrongdoing cannot be inferred merely from expenditure on research, administration or professional services.

Such expenditure may be necessary to establish a lawful and effective reparatory programme.

A responsible finding would require evidence concerning the transaction, authority, accounting treatment and applicable obligations.

The investigation should distinguish expenditure from misappropriation, inefficient spending, disputed policy choices and errors in public reporting.

These are different matters.

Where the evidence establishes only that a payment occurred, the report should say so.

Where the authorisation remains unknown, that should be recorded as an outstanding question.

The investigation should not manufacture a conclusion.

23.47. Requirements for a responsible finding concerning conflicts of interest

A conflict-of-interest finding requires identification of a relevant duty and an interest that may affect its exercise.

A finding of improper management requires further evidence concerning declarations, participation in decisions and applicable procedures.

The existence of several professional affiliations may create a legitimate question.

It does not automatically establish a breach.

The investigation should therefore seek appointment records, conflicts policies and decision-specific evidence.

Where a relevant interest was properly managed, that should be acknowledged.

Where information remains unavailable, the matter should remain open.

23.48. Requirements for a responsible conclusion concerning the GRH overlap

The investigation may responsibly conclude that named individuals participated in both Project Spire-related work and GRH-related activities where public records establish that fact.

However, a conclusion that the Church Commissioners controlled, financed or authorised the GRH requires different evidence.

Relevant evidence might include contracts, formal correspondence, financial records, governing documents or authorised institutional statements.

Without such evidence, the institutional relationship remains unestablished.

The separate GRH investigation should continue to examine the GRH's own organisation and communications.

Project Spire should not be used as a substitute for those records.

23.49. Requirements for a responsible conclusion concerning reparatory adequacy

The adequacy of the £100 million response cannot be established solely by comparing headline financial figures.

The investigation should examine historical responsibility, institutional capacity, programme design, community participation, financial deployment and independently verified outcomes.

The Oversight Group's conclusion that £100 million was insufficient is relevant evidence.

However, RNL should distinguish that advisory assessment from its own eventual conclusions.

The Commissioners' view that the commitment is meaningful is also relevant.

The final assessment should explain the criteria used and the evidence supporting them.

Where delivery remains incomplete, the assessment may necessarily remain provisional.

23.50. Requirements for a responsible conclusion concerning consultation

The Commissioners' reported engagement programme is documented.

The final assessment should therefore recognise that consultation occurred.

However, it should also examine the methodology, accessibility and influence of participation.

A programme may consult many people without securing a representative mandate.

Similarly, an organisation's non-participation does not establish that the entire process was invalid.

The investigation should identify the practical consequences of any confirmed gaps.

The final conclusion should distinguish the quantity of participation from its quality and effectiveness.

23.51. Requirements for a responsible conclusion concerning regulatory legality

The legal position must be assessed through the applicable statutes, regulatory decisions and any relevant court judgments.

The Commissioners' proposed reliance upon a statutory ex gratia mechanism is documented.

However, the existence of a proposed legal route does not establish that every required approval has been obtained.

Similarly, the existence of a challenge does not establish illegality.

The investigation should not prejudge pending proceedings.

Any final legal conclusion should identify the legal basis and authoritative decision upon which it relies.

Where the legal process remains incomplete, that status should be stated.

23.52. The importance of the right of reply

Before finalising a disputed finding concerning an institution or named individual, RNL should provide an appropriate opportunity for response.

The enquiry should identify the relevant documentary facts and questions.

It should not present suspicions as conclusions.

The respondent should be invited to supply corrections, explanations and supporting documents.

Where a response materially changes the evidential position, the report should be revised.

Where a response is incomplete, the limitation should be recorded.

Where no response is received, the investigation should document the request and deadline without treating silence as proof of wrongdoing.

The objective is fairness and reliability.

23.53. The importance of preserving institutional corrections

Corrections are an essential part of independent investigation.

An institution may identify a factual error concerning a date, role or financial figure.

A researcher may supply a document clarifying a previously uncertain relationship.

A new regulatory decision may supersede an earlier status statement.

Such changes should be recorded transparently.

The original statement should remain traceable where appropriate.

The report should explain what changed and why.

The willingness to correct errors is a measure of investigative discipline.

It is not a weakness.

23.54. The importance of preserving alternative explanations

Where more than one explanation remains consistent with the evidence, the investigation should identify those alternatives.

For example, overlapping professional roles may reflect independent participation, institutional collaboration or another arrangement.

A delay may reflect regulatory complexity, organisational difficulty or a combination of factors.

A consultation omission may reflect limited reach, administrative error or another explanation.

These possibilities should not be treated as equally established merely because they can be imagined.

The investigation must identify which alternatives are supported by records and which remain hypothetical.

A responsible conclusion should reflect the comparative strength of the evidence.

23.55. What would materially strengthen the investigation?

Several categories of evidence would substantially improve the investigation.

The first is a current written regulatory and operational status statement from the Church Commissioners.

The second is a complete financial reconciliation from 2019 through the latest reporting date.

The third is an updated governance and delegated-authority chart.

The fourth is confirmation of professional appointment terms and relevant institutional relationships.

The fifth is a complete account of consultation methodology and subsequent engagement.

The sixth is documentary evidence of anti-racism and Institutional Racism safeguards.

The seventh is confirmation of any formal connection between Project Spire and the GRH.

The eighth is the opportunity for relevant institutions and individuals to correct the record.

These are specific, practical evidence requirements.

23.56. What would justify closing a particular question?

An investigative question may be closed when sufficient reliable evidence has been obtained to answer it.

For example, a responsible institution may confirm that no formal financial relationship exists between Project Spire and a separate organisation.

That response may be sufficient for a provisional conclusion, depending upon the question's significance and the availability of independent corroboration.

A financial question may be closed when a complete reconciliation is obtained and appropriately checked.

A professional appointment question may be closed when its institutional terms are confirmed.

However, closing one question does not automatically close the entire investigation.

New evidence may justify reopening a matter.

The relevant process should remain transparent.

23.57. What should not be used to close the investigation?

The investigation should not be closed merely because a respondent prefers no further questions.

It should not be closed because the subject is politically controversial.

It should not be closed because the historical research has attracted criticism.

It should not be closed because the Commissioners have published a substantial FAQ.

It should not be closed because no final finding of wrongdoing has been made.

These circumstances do not eliminate legitimate outstanding questions.

However, the investigation should also avoid indefinite repetition where questions have been adequately answered.

The appropriate objective is evidence-based resolution, not investigation for its own sake.

23.58. The relationship between the investigation and future monitoring

Project Spire may continue to develop after October 2026.

The proposed fund may obtain regulatory approval.

Its governance arrangements may become final.

Capital may be transferred, invested or distributed.

New accounts and reports may be published.

The investigation should therefore distinguish its historical findings from matters requiring future monitoring.

A final report prepared at a particular date cannot establish the outcome of events that have not yet occurred.

It may, however, identify what future developments should be checked.

The evidence register should permit those developments to be recorded without rewriting the earlier chronology.

23.59. The need for an open findings register

RNL should maintain a findings register identifying each substantive proposition.

The register should show its evidential status, supporting sources and outstanding questions.

Where a finding is established, the supporting documents should be identified.

Where a finding is contested, the competing sources should be recorded.

Where a matter remains unverified, the limitation should be stated.

Where a correction is made, the change should be documented.

The register should not transform an investigative question into a finding merely because it has been repeated in several sections.

Repetition does not increase evidential strength.

23.60. The need for an institutional response register

The investigation should record formal institutional correspondence separately.

Each question should have a unique identifier.

The register should include the date sent, recipient, response date, status and relevant documents.

Responses should be assessed according to whether they answer the specific question.

A general institutional assurance may not answer a request for a particular financial document.

A refusal may be legitimate where protected information is involved.

The relevant reason should be recorded.

The objective is to distinguish complete responses from partial or outstanding matters.

23.61. The need for an independent risk register

The risk register should distinguish potential risks from actual incidents.

For each risk, it should identify the relevant activity, possible consequence, existing safeguards and evidence required.

The register should be updated when institutions provide information.

A risk should not remain classified as uncontrolled where satisfactory safeguards are demonstrated.

Equally, a risk should not be treated as controlled merely because an institution states that it is committed to good practice.

The level of assurance should correspond to the evidence.

This is particularly important for possible anti-Black racism and Institutional Racism.

23.62. The need for a corrections register

A corrections register should identify any material factual or interpretative amendment.

It should preserve the original statement, the supporting new evidence and the revised position.

Corrections may concern names, dates, roles, financial figures, statutory references or institutional relationships.

The register should also identify who supplied the correction.

The investigation should not silently alter historical records.

A transparent correction strengthens the final report.

It allows readers to understand how knowledge developed.

23.63. The need for a source-quality register

Not all sources carry the same evidential weight.

An original financial record may provide stronger evidence of a transaction than a newspaper summary.

A governing document may provide stronger evidence of legal authority than an event advertisement.

A firsthand account may establish what someone observed without establishing another person's intentions.

An official statement may reliably identify the institution's position while still requiring verification of underlying claims.

The investigation should therefore evaluate sources according to their relationship to the proposition being examined.

The purpose is not to dismiss secondary sources.

It is to use each source for what it can properly establish.

23.64. The final report's treatment of uncertainty

Uncertainty should be visible.

A proposition described as possible should remain possible unless further evidence justifies a different classification.

A suspicion should be attributed to the person expressing it.

A contested issue should identify the competing evidence.

An unanswered question should remain an unanswered question.

Where no conclusion is possible, the report should explain why.

The investigation should not use exaggerated certainty to make its findings appear stronger.

Nor should it minimise documented facts merely because their implications remain uncertain.

Accurate uncertainty is essential to independent reporting.

23.65. The importance of public trust

Project Spire concerns historical institutional responsibility and proposed financial repair.

Public trust may depend partly upon whether communities can inspect the relevant evidence.

It may also depend upon whether institutions explain decisions, recognise criticism and demonstrate safeguards.

The investigation should therefore assess transparency as a practical matter.

A substantial report may exist while key financial or governance questions remain unanswered.

Conversely, a programme still under development may legitimately be unable to provide information concerning decisions that have not yet been made.

The institution should distinguish these circumstances.

Clear explanations can help reduce avoidable suspicion.

23.66. The preventative importance of professional organisation

RNL maintains that professional organisation is essential to the peaceful advancement of reparatory justice.

A well-maintained evidence register can prevent repeated misunderstandings.

A complete financial reconciliation can distinguish commitments from delivery.

An accurate governance chart can clarify responsibility.

A fair right-of-reply process can prevent unsupported personal accusations.

An effective complaints mechanism can provide a lawful means of addressing serious concerns.

These arrangements do not eliminate disagreement.

However, they create a framework within which disagreement can be examined constructively.

23.67. Avoiding racial stereotyping in conflict prevention

Any consideration of intimidation, threats of violence or public disorder must be approached without racial stereotyping.

The fact that a dispute concerns Black/Afrikan communities does not justify an assumption that those communities are likely to behave violently.

The investigation must distinguish actual threats from peaceful criticism, advocacy and mobilisation.

Risk assessment should be based upon specific evidence and appropriate preventative standards.

RNL's concern is to prevent conflict through transparency, lawful procedures and effective institutional safeguards.

It does not assert that violence is inevitable.

It does not attribute violent intentions to any community or organisation.

23.68. The importance of peaceful disagreement

Reparatory justice may involve disagreements about historical valuation, moral responsibility, compensation, investment and community representation.

Such disagreements are legitimate subjects for public debate.

People should be able to question Project Spire without automatically being treated as hostile.

Likewise, institutions should be able to explain and defend their decisions without being subjected to unsupported allegations.

The investigation should encourage rigorous examination of evidence.

It should also preserve the distinction between criticism and intimidation.

The objective is constructive challenge.

The strength of an argument should depend upon its evidence, not the status or identity of the person making it.

23.69. The role of the proposed final report

The final report should provide a comprehensive account of what Project Spire is, how it developed and what the evidence establishes.

It should identify the historical financial connections, original institutional commitment and subsequent governance and regulatory arrangements.

It should also examine the documented personnel overlap with the GRH without merging the separate investigations.

The report should include the financial evidence, consultation findings, safeguards enquiry and responses from responsible institutions.

Its conclusions should distinguish established facts from outstanding questions.

The final report should also identify what future monitoring is necessary.

The purpose is a reliable permanent reference record.

23.70. The status of the investigation before finalisation

As at 18 October 2026, the investigation has developed a substantial documentary foundation.

However, several important categories of evidence remain outstanding.

These include a current complete financial reconciliation, detailed contractual information, final governance documentation and evidence of operational anti-racism safeguards.

The legal and regulatory position requires a current authoritative statement.

The extent of any formal Project Spire–GRH relationship remains unestablished.

The investigation therefore cannot responsibly declare every material matter resolved.

It may, however, identify the established findings and explain the additional evidence required.

23.71. Preliminary findings summary

Subject	Present finding	Limitation
Project Spire origin	Church Commissioners initiative based upon historical research	Some supporting archival records require further examination
Historical financial connections	Documented Queen Anne's Bounty investments and related research	Precise continuing financial benefit remains uncertain
£100 million	Official institutional commitment	Complete current deployment not established
£1 billion	Oversight Group's wider ambition	Not established as secured capital
Legal route	Proposed charity registration and ex gratia authorisation	Current complete regulatory status requires verification
Preparatory expenditure	Approximately £1 million reported through December 2024	Later costs and internal staff resources not fully established

Governance	Board, Oversight Group and implementation workstreams documented	Final fund powers and community control unverified
Consultation	Substantial engagement programme documented	Representativeness and continuing participation require assessment
Professional appointments	Named archival, research and engagement roles documented	Complete terms and financial authority unverified
GRH overlap	Certain overlapping professional participants documented	Common governance or finance not established
Anti-racism safeguards	Wider Church racial-justice framework documented	Project-specific effectiveness unverified
Communications	Public information channels and parliamentary records available	Completeness and response effectiveness unverified
Reparatory delivery	Investment and grant-making objectives documented	Complete independently verified beneficiary outcomes not established

This table is provisional.

It should be updated as new evidence becomes available.

23.72. Final investigative questions before conclusions

Question 23.1: What current documentary evidence establishes the legal and operational status of the Fund for Healing, Repair and Justice?

Question 23.2: What is the complete financial position of Project Spire as at the latest reporting date?

Question 23.3: What amount of the £100 million has been allocated, transferred, invested or paid?

Question 23.4: What independently verified reparatory benefits have reached affected communities?

Question 23.5: What formal governance powers will affected Black/Afrikan communities possess?

Question 23.6: What complete consultation methodology and continuing-engagement records are available?

Question 23.7: What professional contracts, appointments and financial relationships require confirmation?

Question 23.8: What formal relationship, if any, exists between Project Spire and the Global Reparations Hub?

Question 23.9: What safeguards exist against the possibility of anti-Black racism and Institutional Racism in Project Spire's decisions?

Question 23.10: What independent evidence demonstrates those safeguards operate effectively?

Question 23.11: What outstanding criticisms or legal challenges require formal response?

Question 23.12: What institutional explanations have been supplied concerning delay?

Question 23.13: What evidence supports any conclusion about the adequacy of the £100 million response?

Question 23.14: Have all materially affected institutions and individuals received an appropriate opportunity to correct the record?

Question 23.15: Which issues must remain open because the evidence is insufficient?

These questions should be addressed before responsible final conclusions are made.

23.73. Conclusion: the evidence supports continued enquiry, not predetermined accusations

Project Spire has been examined across its historical, financial, legal, organisational and community dimensions.

The documentary record establishes that the Church Commissioners undertook historical research into financial connections with African chattel enslavement.

It establishes the original £100 million reparatory commitment and the subsequent Oversight Group recommendations.

It establishes a substantial programme of research, consultation, governance development and legal preparation.

It also establishes the participation of certain named individuals in Project Spire-related work and separate GRH-related activities.

However, the investigation has not established that the Church Commissioners financed or controlled the Global Reparations Hub.

It has not established improper conduct by named individuals.

It has not established that the proposed £100 million has been received by affected communities.

It has not obtained a complete financial reconciliation through October 2026.

It has not established that all relevant safeguards against anti-Black racism and Institutional Racism have been independently demonstrated to RNL.

These limitations are material.

They justify further enquiries, disclosure requests and independent verification.

They do not justify unsupported allegations.

The investigation must continue to respect the original meaning of observations, suspicions and questions.

It must permit institutional corrections and competing explanations.

It must also remain willing to reach conclusions where the evidence becomes sufficient.

The central conclusion of Section 23 is that the Project Spire investigation has established a substantial and verifiable documentary foundation, but responsible final findings concerning financial delivery, institutional overlap, governance, legal authority and safeguards require additional primary evidence and fair institutional responses.

RNL's objective remains historical truth, professional organisation, financial accountability, meaningful community participation, institutional safeguards and the peaceful advancement of reparatory justice.

SECTION 23 — PRELIMINARY FINDINGS AND EVIDENTIAL LIMITATIONS REGISTER

Evidence ID	Matter	Present status
SPIRE-23-001	Church Commissioners' original Project Spire research	Established
SPIRE-23-002	Historical financial connection with African chattel enslavement	Documented

SPIRE-23-003	Original £100 million commitment	Established
SPIRE-23-004	Oversight Group's £1 billion-plus ambition	Documented recommendation
SPIRE-23-005	Proposed legal and regulatory route	Documented institutional position
SPIRE-23-006	Complete current authorisation status	Further verification required
SPIRE-23-007	Preparatory expenditure through December 2024	Official aggregate figure
SPIRE-23-008	Complete expenditure through October 2026	Outstanding
SPIRE-23-009	Original Oversight Group and consultation	Established
SPIRE-23-010	Universal representation or consent	Not established
SPIRE-23-011	Named Project Spire archival and engagement roles	Documented
SPIRE-23-012	Overlapping GRH participation	Documented
SPIRE-23-013	Formal Project Spire–GRH governance relationship	Not established
SPIRE-23-014	Formal Project Spire–GRH financial relationship	Not established
SPIRE-23-015	Church-wide racial-justice framework	Documented
SPIRE-23-016	Project-specific independently tested anti-racism safeguards	Not established through records examined
SPIRE-23-017	Current fund operational status	Official information says fund remains in development

SPIRE-23-018	Complete verified reparatory delivery	Not established
SPIRE-23-019	October 2026 legal opposition and proposed challenge	Contemporary reporting; procedural outcome requires verification
SPIRE-23-020	Final findings of individual or institutional wrongdoing	None made
SPIRE-23-021	Formal institutional rights of reply	Further action required
SPIRE-23-022	Final evidential conclusions	Not yet determined

SOURCES AND INDEPENDENT VERIFICATION

Source 23.1 — Church Commissioners: Historical links to African chattel enslavement

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/church-commissioners-links-african-chattel-enslavement

Evidence: Programme origin, institutional research and published response.

Source 23.2 — Church Commissioners: Frequently Asked Questions

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Evidence: Financial model, current establishment process, criticism and institutional explanations.

Source 23.3 — Church Commissioners: Related Documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Evidence: Historical research, Oversight Group recommendations, consultation and published responses to criticism.

Source 23.4 — Church Commissioners: Our Response

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/our-response

Evidence: Institutional response and implementation position.

Source 23.5 — Church Commissioners, January 2026

Response to Parliamentarians' Letter Regarding the Fund for Healing, Justice and Repair.

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Evidence: Institutional treatment of legal, historical and financial criticism.

Source 23.6 — UK Parliament, November 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88600

Evidence: Board's assessment of legal responsibilities and recognition of regulatory requirements.

Source 23.7 — UK Parliament, October 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-10-15/82378

Evidence: Separate proposed stages of charity registration and ex gratia authorisation.

Source 23.8 — UK Parliament, May 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-04-24/48023/

Evidence: Charity Commission discussions and external approval requirements.

Source 23.9 — UK Parliament, March 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-02-05/29047

Evidence: Commissioners' explanation of the source of Project Spire funding and its relationship with parish income.

Source 23.10 — UK Parliament, July 2025

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

Evidence: Commissioners' rejection of a disputed £5 million expenditure claim.

Source 23.11 — Church Commissioners' annual publications

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

Evidence: Financial accounts and historical research documents.

Source 23.12 — Oversight Group report

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Evidence: Fund recommendations, larger ambition, governance, investment and consultation.

Source 23.13 — The Guardian, 13 October 2026

https://www.theguardian.com/world/2026/oct/13/church-of-england-slavery-compensation-fund

Evidence: Contemporary reporting concerning public opposition and possible legal challenge. Secondary evidence only.

Source 23.14 — The Times, October 2026

https://www.thetimes.com/uk/religion/article/church-of-england-slavery-reparations-priest-challenge-7mp38ktwn

Evidence: Reported challenge concerning the legal authority for the proposed fund. No final judicial determination is established by the report.

Source 23.15 — Charity Commission register

https://register-of-charities.charitycommission.gov.uk/

Evidence: Independent check of any registered recipient charity and its publicly available records.

END OF SECTION 23 — PRELIMINARY FINDINGS, EVIDENTIAL LIMITATIONS, COMPETING EXPLANATIONS, INSTITUTIONAL RESPONSES, RISK ASSESSMENT AND THE REQUIREMENTS FOR RESPONSIBLE FINAL CONCLUSIONS

NEXT: SECTION 24 OF 24 — FINAL CONSOLIDATED POSITION, INVESTIGATIVE RECOMMENDATIONS, INSTITUTIONAL NOTICE, CONTINUING MONITORING AND THE FORMAL CONCLUSION OF THE INITIAL PROJECT SPIRE INVESTIGATION.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

SECTION 24 OF 24

FINAL CONSOLIDATED POSITION, INVESTIGATIVE RECOMMENDATIONS, INSTITUTIONAL NOTICE, CONTINUING MONITORING AND THE FORMAL CONCLUSION OF THE INITIAL PROJECT SPIRE INVESTIGATION

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Document status: Final section of the initial 24-section investigation. The investigation's documentary findings are consolidated. Outstanding enquiries, institutional responses, independent verification and subsequent developments remain open.

24.1. Purpose of the final section

This section formally concludes the initial documentary phase of Reparation Nation Limited's investigation into Project Spire.

The investigation began with questions and community concerns about possible connections between Church-related reparatory activities, the development of Project Spire, named individuals and the launch of the Global Reparations Hub.

The enquiries subsequently developed into a detailed examination of the Church Commissioners for England's historical financial connections with African chattel enslavement, their announced £100 million reparatory commitment and the institutional arrangements being developed to implement that commitment.

The investigation has examined historical research, financial valuations, legal powers, regulatory requirements, governance, consultation, professional appointments, financial expenditure, community representation, institutional safeguards and public communications.

It has also identified specific overlapping professional activities involving Project Spire-related personnel and separate reparations initiatives.

Those connections have been documented without converting professional association into an accusation of wrongdoing.

The purpose of this final section is to consolidate the evidence, identify the principal matters requiring institutional answers, establish a practical programme for completing outstanding enquiries and define the standards under which any later conclusions should be reached.

The completion of the initial investigation is not a declaration that every outstanding matter has been resolved.

It marks the completion of the first comprehensive documentary examination and establishes the foundation for the next phase.

24.2. The investigation's formal identity

This investigation has been undertaken by Reparation Nation Limited, Company Number 14761041.

It forms part of the company's wider interest in documenting, examining and supporting the practical delivery of reparatory justice.

RNL is not presenting itself as a regulator, court, prosecuting authority or official representative of every Black/Afrikan community.

It does not claim authority to determine the legal obligations of the Church Commissioners.

It does, however, assert its right to conduct independent research, examine publicly available records, submit lawful questions, seek institutional clarification and publish accurately supported findings.

Its purpose is to contribute to historical understanding, institutional transparency, financial accountability, informed public discussion and the peaceful development of reparatory justice.

The investigation should be assessed on the quality of its evidence and reasoning rather than on any claim of special institutional authority.

24.3. The guiding declaration

RNL's position remains:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

These statements form an essential part of the investigation's meaning.

The first identifies a concern about the possibility of racial bias and the evidence required to understand the safeguards protecting contemporary institutional decisions.

The second expressly prevents that concern from being converted into a predetermined accusation.

The investigation seeks evidence concerning the existence and effectiveness of safeguards.

It does not begin by asserting that the absence of evidence supplied to the investigator proves that racism has occurred.

Nor should an institution's assertion that discriminatory wrongdoing has not been proved be treated as a complete answer to a question about preventative safeguards.

The original meaning of the enquiry must be preserved.

24.4. The principal subject of the investigation

The principal subject is the Church Commissioners' historical and contemporary response to financial connections with African chattel enslavement.

The historical research identified connections involving Queen Anne's Bounty, the South Sea Company and benefactions associated with individuals who may have benefited from enslavement or the plantation economy.

The Commissioners subsequently announced a programme intended to contribute to healing, repair and justice.

That response developed through the proposed Fund for Healing, Repair and Justice, an independent Oversight Group and several implementation workstreams.

The investigation has examined the relationship between the historical evidence, the financial commitment and the arrangements intended to produce practical benefits.

Its central question is whether institutional acknowledgement can be translated into transparent, lawful, accountable and independently verifiable reparatory delivery.

24.5. The starting point: community questions and documentary research

The investigation originally concerned apparent overlap between Church-related reparatory activity and the Global Reparations Hub.

Those questions were legitimate subjects for examination.

However, they required documentary evidence.

Subsequent research identified institutional records, professional biographies, archival publications, event programmes and official Church Commissioners statements.

The investigation therefore moved from initial uncertainty towards a more precise account of documented professional participation.

This progress did not establish every suspected institutional connection.

Rather, it allowed the investigation to distinguish confirmed professional roles from unresolved questions concerning governance, contracts, financing and organisational authority.

That distinction represents an important methodological achievement.

24.6. The established historical foundation

The Church Commissioners' research into the origins of their endowment began in 2019.

The research examined Queen Anne's Bounty, a predecessor institution established in 1704.

It identified investments in South Sea Company-related securities and income associated with those holdings.

It also examined historical benefactions and attempted to trace selected financial resources into later assets.

The Commissioners published an initial announcement in June 2022 and their fuller research report in January 2023.

These are established documentary developments.

They provide a substantial evidential foundation for discussion of the Commissioners' historical responsibility.

However, the precise present-day value of identifiable historical financial benefit remains a separate question requiring careful methodology.

24.7. The distinction between historical responsibility and contemporary liability

The Church Commissioners have acknowledged historical financial connections and expressed sorrow concerning them.

They have proposed a reparatory response.

However, institutional acknowledgement is not identical to a court judgment establishing legal liability to particular claimants.

Historical responsibility, moral obligation, charitable authority and legally enforceable compensation are distinct concepts.

The investigation must not merge them.

It should examine the Commissioners' stated basis for acting and the legal powers under which the proposed response may be implemented.

Equally, the absence of a court-determined compensation obligation would not, by itself, establish that a voluntary reparatory response lacks moral significance.

The final assessment must preserve these distinctions.

24.8. The established £100 million commitment

The Church Commissioners announced their £100 million commitment on 10 January 2023.

The programme was intended to operate over nine years commencing in 2023.

Its proposed activities included impact investment, research and engagement, with the development of grant-making arrangements.

This establishes an institutional commitment.

However, an announcement is not equivalent to financial receipt by affected communities.

A commitment is not necessarily a completed transfer.

A transfer into an investment fund is not necessarily a grant.

An investment is not automatically compensation.

The investigation's financial conclusions must therefore distinguish these stages.

The £100 million figure must not be described as £100 million already delivered to Black/Afrikan beneficiaries.

24.9. The larger £1 billion ambition

The independent Oversight Group regarded the original £100 million commitment as insufficient and recommended a substantially greater ambition.

The Commissioners accepted the Group's recommendations while maintaining their own funding commitment at £100 million.

The proposed £1 billion-plus scale depends upon additional investment, future returns or participation by other institutions.

It should not be presented as secured capital without supporting evidence.

The investigation should continue to distinguish the Commissioners' commitment from the wider ambition.

The existence of a larger target may be significant to future planning.

It is not evidence that the target has been achieved.

24.10. The question of financial adequacy

The adequacy of the proposed response cannot be judged solely through the headline amount.

It requires consideration of the historical evidence, institutional resources, legal powers, intended beneficiaries, financial mechanism and actual outcomes.

The Oversight Group's assessment of insufficiency is relevant evidence.

The Commissioners' own explanation of their commitment is also relevant.

However, RNL's final assessment must be supported by a clear methodology.

The investigation should examine whether the £100 million figure was calculated from historical financial benefit or determined through other financial and institutional considerations.

It should also examine the amount actually deployed and the benefits ultimately received.

Until those matters are established, conclusions concerning adequacy should remain appropriately qualified.

24.11. The legal and regulatory position

The parliamentary record establishes that the Commissioners considered the legal requirements governing their proposed financial response.

They identified the establishment of a new charity and the possibility of obtaining authorisation for an ex gratia payment under section 106 of the Charities Act 2011.

These are distinct legal steps.

The Commissioners' public information examined on 18 October 2026 states that they have not yet applied to register the proposed new charity or to obtain regulatory consent to settle funds on it.

The same public information describes the fund as not yet operational.

These are dated institutional statements.

Their continuing accuracy should be checked whenever the investigation is resumed.

The investigation has not established a completed financial transfer of the original £100 million.

Primary source: Church Commissioners' official FAQs and operational-status page.

24.12. The significance of current regulatory uncertainty

The regulatory position is fundamental to the programme.

The existence of an announced commitment does not remove the requirement for lawful financial administration.

However, delay or an outstanding application does not automatically establish wrongdoing.

The appropriate questions concern the steps undertaken, the reasons for outstanding requirements and the realistic timetable for completion.

The Commissioners should provide a current regulatory chronology.

Where approvals are obtained, their terms should be recorded.

Where the proposed arrangements change, the revised structure should be explained.

Where litigation affects the process, the actual procedural and judicial records should be examined.

The investigation must not substitute speculation for legal evidence.

24.13. Public legal opposition

The programme has attracted parliamentary criticism and legal opposition.

Some critics question whether the Commissioners may use their charitable assets for the proposed purpose.

Others dispute the historical or financial basis of the response.

These are different arguments.

The existence of public opposition does not establish that Project Spire is unlawful.

Nor does the Commissioners' confidence in their position eliminate the possibility of a legitimate legal challenge.

The investigation must preserve the relevant arguments and assess legal claims through authoritative statutory, regulatory and judicial materials.

It should not describe reported legal proceedings as a final judgment unless such a judgment has actually been established.

24.14. Governance findings

The investigation has identified the Church Commissioners' Board of Governors, the independent Oversight Group and the implementation workstreams associated with the proposed fund.

The Oversight Group made recommendations concerning Black community leadership, impact investment, grants and wider reparatory ambition.

The Commissioners subsequently developed governance arrangements.

However, the final legal distribution of authority has not been established through the available documentation.

The investigation should seek the current governing documents, trustee appointment arrangements and delegated powers.

It should determine who may authorise investments, approve grants and alter financial policies.

The presence of advisers must not be confused with final legal authority.

24.15. Community ownership and leadership

The Oversight Group recommended that the fund should ultimately be Black-led and community-owned.

This is an important governance principle.

However, the investigation must determine what those terms mean in practice.

Community consultation is not equivalent to ownership.

The appointment of Black trustees is not necessarily equivalent to an elected community mandate.

Management responsibility is not automatically ownership of assets.

The final structure should identify who appoints trustees, who controls funds, who approves decisions and how affected communities can challenge those decisions.

RNL should evaluate implemented arrangements rather than relying solely upon aspirational descriptions.

24.16. Consultation findings

The Church Commissioners report that 1,106 people participated through combined engagement activities and a global survey during 2023.

The Oversight Group's report identifies consultation in several locations, including England, Jamaica, Barbados and Ghana.

This establishes a substantial consultation process.

However, the evidence does not establish that every relevant grassroots reparations organisation was approached.

It does not establish unanimous consent.

It does not establish that participants collectively represented every community affected by African chattel enslavement.

The investigation should therefore examine consultation methodology, geographical reach, organisational participation and subsequent engagement.

The purpose is to establish the quality and influence of consultation.

24.17. The right of independent grassroots organisations to participate

Independent grassroots Black/Afrikan reparations organisations may possess substantial historical and community expertise.

Their contributions may be relevant to the design of reparatory programmes.

However, no organisation should automatically be regarded as representative of all affected communities.

Likewise, a lack of participation in a particular consultation should not automatically establish deliberate exclusion.

RNL should seek evidence concerning outreach procedures and opportunities for continuing engagement.

It should also establish whether independent organisations can contribute without surrendering their own positions.

Participation should not be confused with endorsement.

24.18. Professional appointments and documented personnel overlap

The investigation has identified publicly documented professional roles associated with Project Spire-related historical research, archival work and engagement.

These include work involving Grant Thornton, academic researchers, Lambeth Palace Library, Dr Annabelle Gilmore, Kwesi Ochosi and Charmaine Simpson.

Public records also identify some of those individuals participating in separate reparations initiatives.

These connections are relevant to institutional accountability.

However, a professional role does not automatically establish authority over the £100 million commitment.

Likewise, involvement in separate initiatives does not establish common governance or financing.

The investigation must continue to distinguish professional association from contractual and institutional control.

24.19. Kwesi Ochosi's archival role

The investigation identified documentary material linking Kwesi Ochosi to Project Spire-related archival research.

A September 2026 Lambeth Palace Library publication explicitly identifies him as Project Spire Coordinator: Archives.

That role should be recorded as documented professional involvement.

However, the available evidence does not establish the complete contractual terms or remuneration of the appointment.

It does not establish authority over investment or grant-making decisions.

It does not establish that the Church Commissioners directed his separate GRH activity.

The responsible institution should therefore clarify the appointment's scope and reporting arrangements.

The evidence should not be expanded beyond what it supports.

24.20. Charmaine Simpson's research and engagement role

Published Church-related materials identify Charmaine Simpson in a research and engagement role associated with the Commissioners' response.

Separate records identify her with Black History Studies and GRH-related activities.

These are documented associations.

However, the investigation has not established that Black History Studies received Project Spire funding.

It has not established that her Project Spire responsibilities included authority over the proposed £100 million fund.

It has not established that the Church Commissioners authorised her GRH participation on their behalf.

These matters remain legitimate questions for institutional clarification.

They are not allegations of misconduct.

24.21. The relationship with the Global Reparations Hub

The investigation has established professional overlap between certain Project Spire-related personnel and the GRH launch.

However, a formal Project Spire–GRH relationship has not been demonstrated through the documents examined.

The investigation has not established common ownership, common trusteeship or shared financial control.

It has not established that the GRH received Project Spire funding.

It has not established that the Church Commissioners directed the GRH launch.

The separate GRH investigation should continue independently.

Project Spire evidence may be cross-referenced where appropriate, but the investigations must not be merged.

24.22. The Black Cultural Centre investigation remains separate

The original GRH event arrangements involved a separate advertised evening event at the Black Cultural Centre in Islington.

Questions subsequently arose concerning the venue, booking authority, cancellation and communications.

Those matters are part of the separate Black Cultural Centre and GRH enquiries.

They should not automatically be attributed to the Church Commissioners.

The Project Spire investigation should include only the evidence necessary to establish a relevant institutional connection.

No such direct institutional responsibility should be inferred merely because overlapping individuals participated in Church-related research and GRH events.

The purpose is to preserve precise institutional boundaries.

24.23. Financial expenditure findings

The Commissioners reported approximately £1 million in Project Spire-related expenditure from 2019 through December 2024.

They identified forensic accounting, risk management, consultation, engagement events, communications, governance and ancillary costs.

The figure excluded internal staff time.

The Commissioners also disputed separate £5 million expenditure and forecast claims raised through parliamentary questions.

These facts must be preserved accurately.

The investigation should not adopt disputed figures as established expenditure.

However, a complete current reconciliation remains necessary.

The approximate £1 million historical figure should not be treated as the total cost through October 2026.

24.24. The need to trace every financial stage

RNL's financial methodology requires separate records for commitments, authorisations, allocations, expenditure, transfers, investments, grants, receipts and outcomes.

A public commitment should not be counted as money received.

An investment should not automatically be counted as compensation.

A grant award should not be counted as completed payment unless receipt is established.

A successful investment return should not automatically be counted as a reparatory benefit to an affected community.

The investigation should therefore establish a complete financial ledger.

The objective is to record what value moved, between which institutions, on what date, under what authority and with what verified consequence.

24.25. The importance of independently verified delivery

Reparatory delivery should be supported by evidence.

Where grants are made, the relevant awards and payments should be documented.

Where investments are completed, the financial instruments and recipients should be identified.

Where community benefits are claimed, the relevant outcomes should be measured.

Where an investment fails or a project does not achieve its intended objective, that should also be reported accurately.

The purpose is not to demand perfect performance.

It is to distinguish proposed benefit from actual benefit.

The investigation should avoid treating publicity or institutional optimism as independent verification.

24.26. Institutional safeguards against anti-Black racism

RNL seeks documentary evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism within Project Spire.

The Church of England possesses a published racial-justice framework.

However, the existence of that framework does not automatically establish that every Project Spire process has effective safeguards.

The investigation should seek project-specific policies and evidence of their application.

Relevant areas include professional appointments, consultation, governance, investment, grant-making, complaints and independent review.

The absence of adequate evidence supplied to RNL remains a legitimate investigative concern.

It must not be misrepresented as a final finding of discrimination.

24.27. The importance of recognising possibility

An institution should be capable of recognising the possibility that discrimination may affect its processes.

That recognition is not an admission that a particular discriminatory act occurred.

The purpose of safeguards is to prevent or identify problems before they cause further harm.

RNL's enquiry therefore asks whether the responsible institutions recognise the risk and what protections exist.

A response stating that no evidence of racism has been established would not, by itself, answer that question.

The investigation should seek the policies, responsible persons, assessment procedures, independent review arrangements and evidence of effectiveness.

The issue is preventative accountability.

24.28. The right to challenge decisions

A reparatory programme should provide clear means of challenging material decisions.

These may concern eligibility, consultation, grants, investments, professional appointments or complaints about discrimination.

The investigation should establish whether decisions can be reviewed independently.

It should also determine whether persons affected receive written reasons where appropriate.

The purpose is procedural fairness.

An unsuccessful applicant is not necessarily a victim of discrimination.

However, an applicant should be able to raise legitimate concerns without automatically being treated as hostile or improperly motivated.

A fair complaints process benefits both the institution and affected communities.

24.29. The right to accurate communication

The investigation has identified substantial official information concerning Project Spire.

The Church Commissioners maintain research pages, FAQs, related documents and a public enquiry mechanism.

They state an aim to respond within 30 working days.

These arrangements are relevant.

However, their existence does not establish that every material question has been answered completely.

The investigation should seek clear written responses identifying the responsible institution and supporting documents.

Questions must be answered according to their actual wording.

Uncertainty terms should be preserved.

Corrections should be recorded.

The objective is to prevent misunderstanding and distortion.

24.30. Documentary evidence must remain accessible

A permanent public investigation should allow readers to examine the supporting evidence.

The original research reports, relevant parliamentary answers, programme announcements and governance materials should therefore remain linked to their sources.

Where possible, original documents should be preserved with publication dates and source details.

Where a document is unavailable, the limitation should be recorded.

Where a webpage changes, the version examined should be identified.

The investigation should not rely solely upon secondary summaries where primary records are available.

The purpose is independent verification.

24.31. The importance of institutional explanations

Institutions possess information that may not be available through public research.

They may be able to explain the reasons for delay, appointment procedures, financial classifications or regulatory decisions.

The investigation should therefore provide appropriate opportunities for formal written explanation.

Such explanations should be considered fairly.

However, an institution's preference for a particular interpretation does not automatically determine the investigation's conclusions.

The response should be assessed against the evidence and the actual questions submitted.

RNL retains responsibility for independent analysis.

24.32. The right of reply

Relevant individuals and organisations should have an opportunity to correct material factual errors.

The right of reply should be fair and specific.

It should identify the issue requiring clarification rather than presenting unsupported accusations.

Responses should be preserved accurately.

Where new evidence changes the position, the report should be updated.

Where the response raises a competing interpretation, that interpretation should be examined.

Silence should not automatically be treated as proof of wrongdoing.

The objective is accurate and responsible reporting.

24.33. The limits of the present investigation

The investigation has not had access to every relevant internal document.

It has not obtained a complete current financial ledger.

It has not independently verified every contractual arrangement.

It has not established the complete current regulatory status from all relevant institutions.

It has not confirmed every proposed governance arrangement.

It has not examined all private consultation records.

It has not received a full Project Spire-specific safeguards dossier.

These limitations must remain visible.

The investigation should not fill them through speculation.

Its findings should reflect the evidence actually available.

24.34. The meaning of the initial investigation's completion

The initial investigation is complete when the first comprehensive documentary examination has been prepared and its outstanding questions identified.

Completion does not mean that every issue is resolved.

It means that the research has reached a point where further progress depends materially upon additional institutional records, formal responses and future developments.

This distinction is important.

The 24-section report should now serve as the permanent starting point for targeted institutional enquiries.

The next phase should not repeat the entire initial research unnecessarily.

It should obtain, evaluate and incorporate the outstanding evidence.

24.35. Formal Recommendation One: obtain an authoritative institutional response

RNL should submit a consolidated formal enquiry to the Church Commissioners.

The enquiry should identify the investigation and request a substantive written response.

It should focus upon the current legal status, the £100 million commitment, expenditure, governance, professional appointments, community engagement and safeguards.

The Commissioners should be invited to identify factual errors in the report.

They should also be asked to supply relevant primary documents or direct links.

The objective is to replace outstanding questions with authoritative evidence wherever possible.

24.36. Formal Recommendation Two: obtain a regulatory reconciliation

RNL should establish the status of the proposed fund through the Charity Commission and the Church Commissioners.

The investigation should identify whether an application to register the fund has been submitted.

It should establish whether any section 106 authorisation has been requested or granted.

It should also examine any conditions attached to regulatory decisions.

The findings should be supported by current records.

A historical statement that no application had been made must not automatically be treated as proof that the position remains unchanged indefinitely.

24.37. Formal Recommendation Three: obtain a complete financial reconciliation

The Church Commissioners should provide a financial account covering Project Spire from 2019 through the latest available period.

The account should distinguish historical research, professional fees, governance, communications, engagement and administration.

It should also explain the treatment of internal staff costs.

The original £100 million commitment should remain a separate category.

Any actual transfers, investments or grants should be identified.

The objective is a transparent money trail.

24.38. Formal Recommendation Four: obtain a governance map

RNL should seek a complete governance and delegated-authority chart.

The chart should identify the Board of Governors, the original Oversight Group, implementation workstreams, responsible officers and proposed fund trustees.

It should distinguish advisory roles from financial powers.

It should also identify the authority to appoint trustees, approve investments, award grants and amend governing arrangements.

The map should be supported by actual institutional documents.

The purpose is to establish who can make which decisions.

24.39. Formal Recommendation Five: clarify professional relationships

RNL should seek written clarification of the Project Spire-related appointments and responsibilities of relevant personnel.

This includes the archival role of Kwesi Ochosi and the research and engagement role of Charmaine Simpson.

The enquiry should identify the commissioning institution, duties, relevant dates and any applicable external-interest procedures.

It should not demand unrelated personal information.

The purpose is accurate institutional attribution.

24.40. Formal Recommendation Six: establish any actual GRH relationship

The Church Commissioners should be asked whether any formal relationship exists between Project Spire and the Global Reparations Hub.

The enquiry should cover governance, contracts, grants, sponsorship, research arrangements and financial support.

If no relationship exists, that should be confirmed.

If a relationship exists, its scope should be identified.

The separate GRH investigation should retain responsibility for examining the GRH's own organisational arrangements.

This prevents investigative drift.

24.41. Formal Recommendation Seven: examine consultation and representation

RNL should seek the full consultation methodology and appropriate information concerning participating organisations.

The Commissioners should explain how the reported 1,106 participants were counted.

They should also identify continuing opportunities for independent grassroots organisations.

The investigation should distinguish participation from consent and representation.

It should also determine how consultation findings influence governance, investments and grants.

The objective is meaningful community involvement.

24.42. Formal Recommendation Eight: obtain a safeguards dossier

RNL should request a consolidated set of documents concerning safeguards against anti-Black racism and Institutional Racism.

The dossier should identify relevant policies, responsible officers, training, complaints, independent review and monitoring procedures.

It should explain how those protections apply specifically to Project Spire and any future fund.

The institution should also address whether it recognises the possibility of racial bias within the relevant decision-making processes.

The enquiry concerns preventative safeguards, not allegations of proven wrongdoing.

24.43. Formal Recommendation Nine: establish public accountability mechanisms

The proposed fund should publish clear information concerning governance, financial commitments, allocations, investments, grants and outcomes once those activities exist.

It should also maintain a corrections procedure.

The relevant institution should identify how enquiries and complaints may be submitted.

Where a response cannot be provided, the limitation should be explained.

The objective is accessible accountability.

24.44. Formal Recommendation Ten: independently verify reparatory delivery

RNL should establish a method for verifying financial and material benefits.

Each relevant transaction should be classified accurately.

Investment capital should be distinguished from grants.

Grants should be distinguished from completed receipts.

Completed receipts should be distinguished from achieved outcomes.

The investigation should maintain a permanent record supported by reliable documents.

The objective is to ensure that reparatory announcements can be assessed against actual delivery.

24.45. Formal Recommendation Eleven: maintain institutional boundaries

Project Spire, the GRH and the Black Cultural Centre investigations should remain separate.

Evidence may be cross-referenced where a documented connection exists.

However, the institutional responsibility of one organisation should not be transferred to another through inference.

The presence of shared participants is not sufficient to establish shared financial control.

The distinction protects the integrity of each investigation.

24.46. Formal Recommendation Twelve: preserve the right of independent challenge

Affected communities and independent organisations should have reasonable opportunities to question the proposed programme.

They should be able to seek explanations concerning governance, finance and eligibility.

Participation in consultation should not automatically be treated as endorsement.

Disagreement should not automatically be treated as hostility.

The investigation should encourage reasoned and peaceful challenge.

24.47. Formal Recommendation Thirteen: independent review of safeguards

The Commissioners should consider how Project Spire's safeguards can be independently examined.

Relevant subjects include appointment procedures, community consultation, conflicts of interest, funding criteria and complaints.

Independent review may assist in identifying deficiencies before they produce harm.

However, the existence of a reviewer should not automatically be treated as proof of effectiveness.

The reviewer must possess an appropriate mandate and access to relevant evidence.

24.48. Formal Recommendation Fourteen: prevention of unnecessary conflict

RNL considers transparency, professional organisation and reliable communication essential safeguards for peace.

The programme should provide procedures for addressing serious disagreements before they become entrenched.

The possibility of intimidation, threats of violence or violence should be addressed through evidence-based preventative arrangements.

This is not an allegation against any person or community.

It is not a prediction that violence will occur.

The objective is to protect lawful criticism, institutional fairness and personal safety.

24.49. Formal Recommendation Fifteen: preserve all original records

The investigation should preserve research reports, financial records, correspondence, parliamentary questions, institutional statements and relevant event documents.

Each item should have a unique identifier.

Material corrections should be recorded.

Original wording should remain traceable where appropriate.

The purpose is to maintain a permanent record capable of supporting future independent examination.

24.50. Formal Recommendation Sixteen: avoid predetermined conclusions

RNL should not declare wrongdoing without sufficient evidence.

It should not infer corruption from professional association.

It should not infer unlawful conduct from public criticism.

It should not infer discrimination merely because no safeguards document has been supplied.

However, it should not abandon legitimate questions merely because wrongdoing has not already been proved.

The investigation must remain open to evidence supporting different outcomes.

The objective is truth rather than confirmation of suspicion.

24.51. Formal Recommendation Seventeen: establish a monitoring programme

Project Spire may continue to develop after the completion of this initial investigation.

RNL should monitor material changes concerning regulatory authorisation, registration of the proposed charity, trustee appointments, financial transfers, investments and grants.

It should also monitor significant legal proceedings and public reporting.

New developments should be incorporated through dated updates.

Earlier records should not be silently overwritten.

The investigation should maintain a clear chronology.

24.52. Formal Recommendation Eighteen: prepare a public executive summary

The 24-section report should remain the substantive investigative record.

However, a shorter public executive summary may assist readers who need a rapid overview.

The summary should identify established facts, principal outstanding questions and immediate recommendations.

It should preserve the distinction between documented findings and unresolved concerns.

It should not use provocative descriptions unsupported by the evidence.

The full report should remain available for detailed verification.

24.53. Formal Recommendation Nineteen: prepare institutional correspondence

Following completion of the report, RNL should prepare targeted correspondence for the institutions responsible.

The Church Commissioners should receive the principal consolidated enquiry.

The Charity Commission should receive questions concerning regulatory matters.

Lambeth Palace Library should receive questions concerning archival responsibilities and appointments.

Other organisations should be contacted only where relevant to their documented activities.

Each request should identify the action required.

The purpose is to avoid sending every institution questions outside its responsibility.

24.54. Formal Recommendation Twenty: retain final conclusions as evidence-dependent

The current report should not declare the outstanding enquiries resolved.

Material final conclusions should follow institutional responses and independent verification.

Where a question remains unanswered, the report should state that position.

Where evidence establishes an answer, the finding should be updated.

Where a correction is required, it should be made transparently.

The objective is an investigation capable of reaching conclusions without predetermining them.

24.55. CONSOLIDATED FINAL FINDINGS TABLE

Subject	Established position	Further requirement
Project Spire origin	Church Commissioners initiative following historical research	Preserve full chronology and original research
Historical enslavement connections	Queen Anne's Bounty investments and benefactions documented	Examine remaining asset-tracing and valuation questions
£100 million	Official institutional commitment announced in January 2023	Current financial reconciliation
£1 billion-plus	Wider ambition recommended by Oversight Group	Verify any additional secured capital
Legal authorisation	Proposed legal and regulatory route documented	Obtain current regulator-confirmed status
Fund operation	Official pages describe fund as not operational	Recheck subsequent developments
Preparatory expenditure	Approximately £1 million reported through December 2024	Complete later costs and excluded items
Governance	Board, advisory group and workstreams documented	Final governing documents and delegated powers
Community consultation	Substantial 2023 consultation documented	Methodology and continuing-engagement assessment
Personnel overlap	Relevant professional participation documented	Clarify actual contractual and institutional boundaries
GRH relationship	Shared participants documented	Formal governance or financial relationship not established
Anti-racism safeguards	Wider Church framework documented	Project-specific evidence and effectiveness review
Financial delivery	Proposed investment and grant-making model documented	Verify any actual transfers, grants and outcomes

Individual wrongdoing	No finding made	Further evidence required before any such conclusion
Institutional accountability	Public information and parliamentary scrutiny documented	Complete responses, corrections and current reporting

This table represents the position at the date of the report.

It must be updated when reliable new information becomes available.

24.56. The formal institutional notice

The completed investigation should be accompanied by a formal notice to the Church Commissioners.

The notice should explain that RNL has undertaken an independent documentary examination of Project Spire.

It should identify the principal historical, financial, governance and safeguarding questions.

It should also invite corrections and request relevant supporting records.

The notice should expressly state that no accusations, allegations, assumptions, assertions of wrongdoing or conclusions of wrongdoing are being advanced.

The purpose is to obtain evidence and clarification.

It should not imply that the recipient is legally obliged to respond to every voluntary request unless a specific applicable legal duty has been established.

24.57. Suggested scope of the initial institutional response

The Church Commissioners' first substantive response should address the matters most necessary to establish the current position.

These include the status of the proposed fund, regulatory authorisations, the £100 million commitment, preparatory expenditure and existing governance.

The response should also identify relevant project-specific safeguards against anti-Black racism and Institutional Racism.

Questions concerning professional roles and external institutional relationships should be answered by the appropriate responsible officer.

The Commissioners should be invited to identify matters outside their responsibility.

The objective is a coherent, usable documentary response rather than disconnected statements.

24.58. The right to refuse or restrict particular disclosures

Some requested information may be subject to legal privilege, privacy protections or legitimate contractual confidentiality.

The investigation must recognise those limits.

However, an institution may still be able to provide aggregated figures, redacted documents or explanatory summaries.

Where a request cannot be fulfilled, the respondent should identify the reason where appropriate.

RNL should not automatically treat every restriction as concealment.

The purpose is the fullest proportionate disclosure consistent with applicable legal obligations.

24.59. The treatment of institutional silence

If an institution does not respond, the investigation should preserve the original request and the period allowed for response.

It should not infer that silence establishes wrongdoing.

The absence of a response may nevertheless leave a material question unresolved.

Where appropriate, RNL may send a focused follow-up.

The final report should identify what information remained outstanding at its publication date.

The purpose is accurate reporting.

24.60. The treatment of contradictory evidence

If a new document contradicts an earlier interpretation, the investigation should examine the source and its authority.

Where the new evidence is stronger, the report should be corrected.

Where competing explanations remain plausible, the issue should remain contested.

An institution's disagreement should not automatically invalidate independent research.

Equally, RNL should not disregard authoritative evidence merely because it undermines an earlier concern.

The objective is to establish the best-supported position.

24.61. The treatment of historical research disputes

Some aspects of the Commissioners' historical financial interpretation have attracted criticism.

The final record should preserve the original research and relevant evidence-based responses.

It should distinguish the existence of South Sea Company investments from disagreements about the precise financial significance of those instruments.

It should also distinguish historical monetary equivalents from present-day assets.

The report must not select valuation methods arbitrarily.

Historical research should be evaluated through sources, methodology and reasoned criticism.

24.62. The treatment of legal disputes

The proposed fund has attracted legal and parliamentary scrutiny.

The investigation should preserve the Commissioners' legal position and the arguments advanced by critics.

However, a reported legal challenge should not be described as a final judicial decision.

A regulatory application should not be described as approved before approval is verified.

The final legal status should be established through current statutory, regulatory and judicial records.

Where proceedings remain pending, that position should be stated.

24.63. The treatment of financial disputes

Financial figures should be supported by identifiable records.

The reported approximate £1 million preparatory expenditure should be distinguished from the original £100 million commitment.

The disputed £5 million expenditure and forecast claims should remain identified as disputed.

The proposed £1 billion ambition should remain separate from secured capital.

Investment growth should be distinguished from grants received by communities.

The investigation should not combine unlike figures to produce dramatic but misleading totals.

The objective is financial clarity.

24.64. The treatment of community disagreements

Affected communities may disagree about reparatory priorities.

Some may favour direct compensation.

Others may favour collective investment or institutional restoration.

Some may support the Commissioners' model.

Others may question its scale, governance or accessibility.

These positions should be examined fairly.

The investigation should not assume that a single organisation represents all affected people.

Nor should it treat disagreement as a reason to exclude a participant from legitimate consultation.

The objective is meaningful and accountable engagement.

24.65. The treatment of Institutional Racism concerns

RNL's safeguards enquiry remains open.

The relevant institutions should explain whether they recognise the possibility of anti-Black racism and Institutional Racism within contemporary decision-making.

They should identify the protections that exist and how those protections operate.

The investigation should evaluate the evidence supplied.

It should not declare that racism occurred without adequate support.

However, it should not abandon preventative scrutiny simply because a final discriminatory finding has not been established.

The possibility of institutional bias and the existence of safeguards are legitimate questions in their own right.

24.66. The permanent investigation archive

The 24-section report should form the principal narrative record.

It should be accompanied by an evidence archive containing the original documents.

The archive should distinguish primary sources, official statements, secondary reporting and attributed accounts.

Each document should be assigned a unique identifier.

Changes and corrections should be dated.

The archive should also contain the correspondence and response registers.

The purpose is to permit future investigators to reconstruct how each finding was reached.

24.67. The permanent financial archive

Financial evidence should be maintained separately from narrative analysis.

The archive should distinguish budgets, expenditure, commitments, investments, grants and verified receipts.

It should include relevant annual reports and parliamentary statements.

Where financial information remains unavailable, the limitation should be recorded.

No missing amount should be replaced with an invented estimate.

The purpose is a credible money trail capable of being updated as the programme develops.

24.68. The permanent governance archive

Governance records should include the original Oversight Group terms of reference, relevant Board statements and implementation documents.

Any eventual fund governing document should be preserved.

Trustee appointments and delegated powers should be recorded with dates.

Where governance arrangements change, the original and revised structures should remain available.

The purpose is to distinguish promises concerning community ownership from actual authority.

24.69. The permanent safeguards archive

RNL should maintain a separate record of anti-racism and Institutional Racism safeguards.

The archive should identify policies, risk assessments, complaints arrangements and independent review mechanisms.

It should also record any institutional explanations concerning their effectiveness.

Where no evidence has been supplied, that status should be clearly stated.

The archive must distinguish the absence of evidence supplied to RNL from proof that no policy exists.

This distinction is fundamental to accurate reporting.

24.70. The permanent correspondence archive

All substantive correspondence should be preserved.

The archive should identify recipients, dates, questions, responses and outstanding matters.

It should also preserve corrections and clarifications.

The purpose is to avoid repeated confusion about what was asked and answered.

Where a communication concerns a separate investigation, it should be filed in that investigation and cross-referenced only where necessary.

24.71. Future monitoring priorities

Future monitoring should focus upon material changes rather than repeatedly reproducing the original investigation.

Priority developments include charity registration, regulatory approval, new trustees, fund operation, financial transfers, investment activity, grant-making and independently verified outcomes.

The investigation should also follow significant legal proceedings and published institutional responses.

Each development should be dated and linked to its source.

Where no material change occurs, the record should say so without inventing progress.

24.72. Responsibility for continuing the investigation

Reparation Nation Limited should retain control of its own investigative records and conclusions.

The Church Commissioners and other institutions may provide evidence and explanations.

They should not be treated as possessing editorial control over RNL's findings.

Equally, RNL should remain responsible for correcting inaccurate information and fairly presenting institutional responses.

The investigation should be conducted through lawful and peaceful methods.

Its authority comes from the quality of its documentary work.

24.73. Conditions for issuing further findings

New findings should be issued only when supported by reliable evidence.

A professional role should not be expanded into financial authority without documentation.

A reported payment should not be treated as established without an adequate financial source.

A potential conflict should not be treated as misconduct without decision-specific evidence.

A concern about racial bias should not become a declaration of proven discrimination without appropriate support.

Where evidence remains insufficient, the matter should remain open.

The objective is responsible and accurate reporting.

24.74. Conditions for closing an individual enquiry

An individual question may be closed when it has received a sufficiently supported answer.

For example, an institutional relationship may be confirmed through an agreement or denied through an authoritative explanation supported by relevant records.

A financial question may be resolved through a reconciled account.

A governance question may be resolved through the relevant governing document.

Where a question remains contested, the evidence should be assessed and the unresolved aspect identified.

Closing one question does not automatically close all related matters.

24.75. Conditions for concluding the wider investigation

The wider investigation may be considered substantially resolved when the material outstanding questions have been answered or their evidential limits are sufficiently clear.

It is not necessary to obtain every conceivable document before reporting reliable findings.

However, material limitations must be disclosed.

The final report should identify what was established, what remained contested and what could not be verified.

It should also identify future matters requiring monitoring.

The purpose is a responsible conclusion, not indefinite uncertainty.

24.76. The importance of an open correction process

An independent report should remain capable of correction.

Institutions or individuals may identify errors.

New documents may clarify dates, responsibilities or financial positions.

Regulatory decisions may change the programme's status.

Corrections should be recorded transparently.

Where appropriate, the original statement should remain traceable.

The willingness to correct a report is consistent with investigative integrity.

24.77. The importance of avoiding distortion

The investigation must preserve the actual meaning of questions and responses.

A suspicion must not become an allegation merely through repetition.

A possibility must not become an established fact without evidence.

An institutional statement must not be expanded beyond its scope.

A correction must not be concealed because it changes an earlier interpretation.

RNL's commitment to independent enquiry includes a commitment to accurate language.

The meaning of a statement belongs to the person who made it and should not be altered without justification.

24.78. The importance of protecting participants

The investigation involves named individuals, organisations and communities.

It should avoid unnecessary disclosure of private information.

It should not encourage harassment or intimidation.

It should provide fair opportunities for correction.

It should distinguish professional accountability from personal targeting.

Public scrutiny may be robust without becoming abusive.

These principles apply to both the institutions examined and the investigator.

24.79. The preventative objective of the investigation

Reparatory justice concerns historical suffering and substantial questions about institutional responsibility.

Disagreement may arise over financial adequacy, governance, representation and delivery.

RNL considers professional organisation, transparent records and fair procedures essential foundations for peace.

The possibility of threats of violence or physical conflict should be addressed through appropriate preventative measures.

This is not a prediction of violence.

It is not an allegation against a particular person or community.

The investigation seeks to prevent unnecessary escalation by replacing rumour and confusion with evidence and accountability.

24.80. The importance of lawful and peaceful challenge

Independent organisations and affected communities should be able to question Project Spire.

They should be able to request information and challenge decisions lawfully.

They should not be required to accept an institutional account merely because it is official.

At the same time, criticism should be supported by evidence and should not involve intimidation or unsupported personal accusations.

The objective is constructive challenge.

RNL's investigation is intended to contribute to that process.

24.81. The final consolidated action register

Action ID	Action	Responsible respondent or lead	Status
SPIRE-F01	Obtain current Project Spire status	Church Commissioners	Outstanding
SPIRE-F02	Verify charity registration	Charity Commission / Church Commissioners	Outstanding

SPIRE-F03	Verify ex gratia authorisation status	Charity Commission / Church Commissioners	Outstanding
SPIRE-F04	Reconcile the £100 million commitment	Church Commissioners	Outstanding
SPIRE-F05	Obtain complete preparatory expenditure 2019–26	Church Commissioners	Outstanding
SPIRE-F06	Obtain full current governance structure	Church Commissioners	Outstanding
SPIRE-F07	Clarify Oversight Group's current position	Church Commissioners	Outstanding
SPIRE-F08	Clarify Black community ownership proposals	Church Commissioners / proposed fund	Outstanding
SPIRE-F09	Clarify archival research appointments	Lambeth Palace Library / responsible institution	Outstanding
SPIRE-F10	Clarify research and engagement appointments	Church Commissioners	Outstanding
SPIRE-F11	Confirm any Project Spire–GRH formal relationship	Responsible institutions	Outstanding
SPIRE-F12	Obtain consultation methodology and later engagement records	Church Commissioners	Outstanding
SPIRE-F13	Obtain safeguards against anti-Black racism and Institutional Racism	Church Commissioners / proposed fund	Outstanding
SPIRE-F14	Identify independent complaints and appeals	Responsible institutions	Outstanding
SPIRE-F15	Obtain detailed financial transaction records	Responsible asset holders	Outstanding
SPIRE-F16	Verify grants and beneficiary outcomes	Relevant fund / recipients	Not yet established
SPIRE-F17	Invite formal right of reply	RNL	To be undertaken

SPIRE-F18	Establish continuing source monitoring	RNL	To be organised
SPIRE-F19	Maintain permanent evidence and correction registers	RNL	Continuing
SPIRE-F20	Prepare updated conclusions after institutional responses	RNL	Future stage

This register should be updated as each action is completed.

It should not be interpreted as evidence that the responsible institutions have failed to perform duties merely because RNL has not yet obtained the relevant response.

24.82. The distinction between documentary completion and substantive resolution

The completion of all 24 sections is an important stage.

However, it is necessary to distinguish the completion of a written investigation from resolution of the matters investigated.

The report now contains a structured account of the historical record, institutional developments, documented professional overlap and outstanding questions.

That account permits targeted institutional enquiries.

It does not eliminate the need for additional evidence.

The next phase should therefore focus upon responses and verification rather than simply producing more narrative without new information.

This will allow the investigation to progress efficiently.

24.83. The final evidential position

The documentary record establishes that the Church Commissioners undertook historical research into financial connections with African chattel enslavement.

It establishes the original £100 million reparatory commitment.

It establishes the appointment of an independent Oversight Group and the development of recommendations concerning governance, investment, grants and Black community leadership.

It establishes preparatory expenditure and ongoing legal and regulatory work.

It establishes certain professional roles associated with Project Spire and overlapping participation in separate reparations initiatives.

However, it does not establish that the Church Commissioners controlled or funded the Global Reparations Hub.

It does not establish financial misconduct or improper conflicts involving named persons.

It does not establish that £100 million has been received by affected communities.

It does not establish that all relevant safeguards against anti-Black racism and Institutional Racism have been demonstrated to RNL.

These distinctions must remain visible.

24.84. Final investigative conclusion

Project Spire represents a significant institutional attempt to respond to documented historical financial connections between the Church Commissioners' predecessor fund and African chattel enslavement.

The original research and subsequent £100 million commitment are substantial developments.

However, the adequacy and practical significance of a reparatory response cannot be determined solely by its announcement.

The programme must be examined through its legal authority, financial administration, governance, community participation and actual outcomes.

The investigation has established that Project Spire possesses a documented institutional history, a proposed investment-led response and a substantial advisory and implementation framework.

It has also established that certain professional participants undertook work relevant to both Project Spire-related research and separate reparations initiatives.

However, the evidence does not justify assuming that those initiatives are institutionally or financially controlled by the same organisation.

The original community questions therefore remain legitimate subjects for clarification, but they must not be transformed into unsupported conclusions.

The investigation's most important outstanding requirement is a complete institutional explanation of the legal, financial and governance position, supported by primary documents.

The second essential requirement is evidence of the safeguards protecting contemporary decisions against the possibility of anti-Black racism and Institutional Racism.

The third is the establishment of a reliable money trail capable of distinguishing promises, authorisations, allocations, investments, grants, receipts and verified reparatory outcomes.

The final conclusion of the initial investigation is that Project Spire's historical foundations and principal institutional commitments are documented, but important questions remain concerning financial deployment, governance authority, community representation, professional relationships, legal implementation and effective racial-justice safeguards. Those questions require formal institutional answers and independent verification before responsible final findings can be made.

RNL therefore concludes the initial documentary phase without declaring wrongdoing or prejudging the unresolved matters.

24.85. Formal closing declaration

Reparation Nation Limited records that this investigation has been undertaken for the purpose of advancing historical understanding, institutional transparency, financial accountability, professional organisation and peaceful reparatory justice.

It seeks to establish what has occurred, who possessed responsibility, what financial resources were involved, what benefits were intended and what reparatory value has actually been delivered.

It also seeks evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism.

RNL does not claim that the absence of evidence supplied to the investigator establishes that discriminatory wrongdoing has occurred.

It does not claim that overlapping professional associations automatically establish improper institutional relationships.

It does not claim that the original £100 million commitment has already been received by affected communities.

It invites relevant institutions and individuals to provide documentary clarification and correction.

RNL makes no accusations, no allegations, no assumptions, no assertions of wrongdoing, and has come to no conclusions concerning wrongdoing.

The investigation remains committed to evidence, fairness, accountability and peaceful resolution.

SECTION 24 — FINAL DOCUMENTARY EVIDENCE REGISTER

Evidence ID	Matter	Final initial-stage status
SPIRE-24-001	Church Commissioners' historical research	Documented
SPIRE-24-002	Queen Anne's Bounty historical financial connections	Documented
SPIRE-24-003	Original £100 million commitment	Documented
SPIRE-24-004	Oversight Group's £1 billion-plus ambition	Documented recommendation
SPIRE-24-005	Proposed Fund for Healing, Repair and Justice	Documented institutional proposal
SPIRE-24-006	Complete current regulatory authorisation	Further verification required
SPIRE-24-007	Original Oversight Group and consultation	Documented
SPIRE-24-008	Final community ownership and authority	Not established
SPIRE-24-009	Preparatory expenditure to December 2024	Aggregate amount documented
SPIRE-24-010	Complete expenditure to October 2026	Outstanding
SPIRE-24-011	Project Spire archival and engagement roles	Documented in part
SPIRE-24-012	Professional overlap with GRH activities	Documented
SPIRE-24-013	Formal Project Spire–GRH financing or control	Not established

SPIRE-24-014	Church-wide racial-justice framework	Documented
SPIRE-24-015	Project-specific safeguards and demonstrated effectiveness	Further verification required
SPIRE-24-016	Independently verified reparatory grants and outcomes	Not established through reviewed evidence
SPIRE-24-017	Current public information channels	Documented
SPIRE-24-018	Formal institutional responses to RNL's consolidated questions	Outstanding
SPIRE-24-019	Findings of individual or institutional wrongdoing	None made
SPIRE-24-020	Initial 24-section documentary investigation	Completed as a draft
SPIRE-24-021	Formal disclosure and response phase	Next stage
SPIRE-24-022	Future monitoring and updated findings	Continuing requirement

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SOURCES AND INDEPENDENT VERIFICATION

Source 24.1 — Church Commissioners: Historical links to African chattel enslavement

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/church-commissioners-links-african-chattel-enslavement

Evidence: Institutional origin, historical acknowledgement and public information framework.

Source 24.2 — Church Commissioners: Historical findings

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/what-we-know

Evidence: Queen Anne's Bounty, the South Sea Company, benefactions and institutional succession.

Source 24.3 — Church Commissioners, 10 January 2023

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Evidence: Original £100 million commitment and proposed reparatory programme.

Source 24.4 — Church Commissioners: Frequently Asked Questions

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Evidence: Financial model, £1 billion ambition, regulatory information, institutional explanations and programme status.

Source 24.5 — Church Commissioners: Related Documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

Evidence: Historical research reports, Oversight Group terms, consultation and responses to criticism.

Source 24.6 — Oversight Group Report

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Evidence: Governance recommendations, larger financial ambition, consultation, investment and grant-making.

Source 24.7 — Church Commissioners: Implementation update

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

Evidence: Programme workstreams and implementation development.

Source 24.8 — Church Commissioners: Public enquiry and operational status

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Feedback mechanism, response aim and statement that the proposed fund remains non-operational.

Source 24.9 — UK Parliament: Project Spire expenditure

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

Evidence: Approximately £1 million expenditure through December 2024, with stated exclusions.

Source 24.10 — UK Parliament: Regulatory and financial position

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

Evidence: Dated explanation of the commitment's general-fund status pending regulatory authority.

Source 24.11 — UK Parliament: Trustee and regulatory responsibilities

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88600

Evidence: Board consideration of legal responsibilities.

Source 24.12 — Church Commissioners: Formal response to parliamentarians

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

Evidence: Institutional response concerning historical research, legal authority and programme development.

Source 24.13 — Charity Commission register

https://register-of-charities.charitycommission.gov.uk/

Evidence: Independent future verification of the proposed fund's legal registration.

Source 24.14 — Charities Act 2011

https://www.legislation.gov.uk/ukpga/2011/25/contents

Evidence: Statutory framework for charitable administration and relevant authorisations.

Source 24.15 — Church of England: Racial Justice

https://www.churchofengland.org/about/racial-justice

Evidence: Wider institutional racial-justice framework requiring examination in relation to Project Spire.

FORMAL COMPLETION NOTICE

PROJECT: FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

SUBJECT: PROJECT SPIRE — CHURCH COMMISSIONERS FOR ENGLAND — HISTORICAL FINANCIAL CONNECTIONS WITH AFRICAN CHATTEL ENSLAVEMENT — PROPOSED £100 MILLION FUND FOR HEALING, REPAIR AND JUSTICE — INSTITUTIONAL GOVERNANCE AND ACCOUNTABILITY

REPORT STRUCTURE: 24 substantive investigative sections, with associated source references, evidence registers, questions and recommendations.

INITIAL DOCUMENTARY PHASE: COMPLETED AS A DRAFT — 18 OCTOBER 2026

FORMAL INSTITUTIONAL DISCLOSURE AND RIGHT-OF-REPLY PHASE: OUTSTANDING

FURTHER INDEPENDENT VERIFICATION: REQUIRED

FINAL DETERMINATIONS OF WRONGDOING: NONE MADE

CONTINUING MONITORING: REQUIRED

NEXT OPERATIONAL STAGE: Prepare and issue formal consolidated institutional correspondence; obtain responses; reconcile financial, governance and regulatory records; update the evidence and corrections registers; and prepare subsequent findings according to the evidence.

FINAL SIGNATURE AND AUTHORISATION

For and on behalf of Reparation Nation Limited

Derrick Emmanuel Lynch
Also known as John Canoe
Reparation Nation Limited
Company Number: 14761041

Date: 18 October 2026

Status: Prepared for independent investigative purposes. The report does not purport to be a judicial determination, regulatory ruling or finding of misconduct.

END OF SECTION 24 OF 24

END OF THE INITIAL 24-SECTION PROJECT SPIRE INVESTIGATION

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

THE DOCUMENTARY INVESTIGATION IS COMPLETE AS A DRAFT. THE EVIDENCE-OBTAINING AND ACCOUNTABILITY PROCESS CONTINUES.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

APPENDIX A OF F

CONSOLIDATED MASTER EVIDENCE REGISTER: HISTORICAL RECORDS, INSTITUTIONAL DOCUMENTS, FINANCIAL COMMITMENTS, PROFESSIONAL ROLES, GOVERNANCE, CONSULTATION, SAFEGUARDS AND OUTSTANDING VERIFICATION

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Document status: Master evidence-register draft accompanying Sections 1–24. Existing section-level identifiers are retained as cross-references. Original documents, remaining primary-source checks and institutional responses must be reconciled before final publication.

A.1. Purpose and authority of this appendix

This appendix consolidates the principal documentary evidence, source references, findings and evidential limitations developed throughout the 24 substantive sections of the Project Spire investigation.

It is intended to provide a permanent reference system through which each significant proposition may be traced to its source.

The register does not replace the original documents.

It does not replace the analysis contained in Sections 1–24.

Its function is to identify the evidence supporting that analysis, distinguish established facts from unresolved matters, and record what additional documentation must be obtained.

The investigation began with questions concerning apparent professional and institutional overlap between Project Spire and the Global Reparations Hub.

It subsequently expanded to examine the Church Commissioners for England's historical financial connections with African chattel enslavement, the proposed £100 million Fund for Healing, Repair and Justice, the financial and legal arrangements supporting that programme, and the safeguards protecting its decision-making.

The appendix preserves that history without merging the separate investigations.

A document relevant to the Global Reparations Hub may be cross-referenced within Project Spire only where it establishes a particular relevant connection.

It must not be used as a substitute for proof of common governance, financial support or institutional authority.

A.2. Scope of the master register

The master register covers the principal evidential material concerning:

- The origins and development of Project Spire.
- Queen Anne's Bounty and historical financial connections with African chattel enslavement.
- South Sea Company investments, benefactions and historical financial valuation.
- The Church Commissioners' original £100 million commitment.
- The independent Oversight Group and its recommendations.
- The proposed £1 billion-plus ambition.
- The proposed Fund for Healing, Repair and Justice.
- Legal powers, Charity Commission processes and regulatory status.
- Preparatory expenditure, professional fees and financial delivery.
- Governance, trustee responsibilities and community leadership.
- Consultation and grassroots participation.
- Named professional roles and overlapping external affiliations.
- Safeguards against the possibility of anti-Black racism and Institutional Racism.
- Public communications, institutional responses and outstanding disclosure.
- Possible institutional relationships with the Global Reparations Hub.

The detailed section-level evidence registers remain part of the report.

This appendix provides a consolidated higher-level index.

A.3. Rules governing evidence classification

Each registered matter must be classified according to the actual strength and nature of the available evidence.

A primary record may establish the occurrence of a particular transaction, appointment or decision.

An official statement may establish the position adopted by an institution.

A parliamentary answer may establish what an authorised respondent stated on a particular date.

A published biography may establish a person's publicly described professional role, but not necessarily their contractual terms or delegated financial powers.

A firsthand account may establish what the author reports experiencing without independently establishing another person's intentions.

A newspaper article may identify a reported development requiring verification through original records.

The register must therefore distinguish the type of evidence from the proposition it is used to support.

An official statement is not automatically independent corroboration.

Likewise, two reports repeating the same original statement do not necessarily provide two independent sources.

A.4. Master classification codes

Code	Classification	Meaning
PR	Primary record	Original legislation, official decision, contemporary record, financial statement or institutional document directly relevant to the claim
OS	Official statement	Position published or communicated by the responsible institution
PA	Parliamentary answer	Dated response appearing in the official parliamentary record
AR	Archival research	Historical material or research based on identifiable archival records
IR	Independent research	Research or analysis capable of independent examination
FP	First-person account	Attributed description of a person's own observations or experience
SR	Secondary reporting	Journalism, commentary or other derivative reporting

CR	Corroborated	A proposition supported by more than one materially independent source
CT	Contested	Substantive disagreement concerning interpretation or factual content
UV	Unverified	Insufficient supporting evidence currently available
NE	Not established	The examined evidence does not support the proposed conclusion
OR	Outstanding record	A document or dataset required for further examination
COR	Correction	A documented change to an earlier entry or finding

More than one code may apply.

For example, an official parliamentary answer may be classified PA and OS.

Its contents may still require further verification if the question concerns underlying transactions rather than merely the institution's stated position.

A.5. Rules for recording documentary sources

Each source should possess a stable master identifier.

The register should preserve its exact title, issuing organisation, date and original URL or archival reference.

Where a document is a PDF, the original file should be retained where lawful.

Where a webpage may change, the date examined should be recorded.

Where a document is later updated, the revised version should receive a separate version entry.

Original wording should be preserved where it materially affects meaning.

A source should not be silently replaced because a newer document expresses a different position.

The chronology of changes is itself relevant evidence.

A.6. Master source identification system

The following identifier families should be used.

Identifier family Subject

SPIRE-HIS	Historical research and archival financial evidence
SPIRE-FIN	Financial commitments, accounts, expenditure and delivery
SPIRE-LEG	Legislation, regulatory procedures and legal status
SPIRE-GOV	Governance, oversight, trustee powers and delegation
SPIRE-CON	Consultation, representation and participation
SPIRE-PER	Professional roles, appointments and organisational affiliations
SPIRE-COM	Communications, public statements and correspondence
SPIRE-SAF	Anti-racism, Institutional Racism and procedural safeguards
SPIRE-GRH	Verified cross-references to the separate GRH investigation
SPIRE-ACT	Outstanding documentary requests and investigative actions

The existing references SPIRE-01 through SPIRE-24 should remain attached to their respective substantive sections.

The new identifiers function as a cross-sectional master index, not replacements for those references.

PART I — HISTORICAL AND ARCHIVAL EVIDENCE

A.7. Queen Anne's Bounty

Master Evidence ID: SPIRE-HIS-001

Subject: Establishment and historical function of Queen Anne's Bounty.

Evidence: The predecessor institution was established in 1704 to augment the incomes of poorer Anglican clergy.

Principal significance: Establishes the institutional origin of the historical financial resources investigated by the Church Commissioners.

Classification: PR / AR.

Documentary basis: Church Commissioners' full historical research report and official explanatory publications.

Status: Documented.

Outstanding requirement: Preserve the historical legal foundation and original research references.

Related substantive sections: 11, 12, 14 and 23.

A.8. South Sea Company formation and historical activities

Master Evidence ID: SPIRE-HIS-002

Subject: The South Sea Company and transatlantic African chattel enslavement.

Evidence: The South Sea Company was established in 1711 and subsequently acquired rights concerning the supply and trafficking of enslaved Africans to Spanish America.

Principal significance: Establishes the historical context of the financial instruments examined in the Queen Anne's Bounty research.

Classification: AR.

Status: Documented historical context.

Outstanding requirement: Preserve primary historical records and distinguish the Company's activities at different dates from the precise timing of Queen Anne's Bounty's investments.

Related substantive sections: 11 and 12.

A.9. Queen Anne's Bounty's South Sea Company investments

Master Evidence ID: SPIRE-HIS-003

Subject: Investments and income associated with South Sea Company securities.

Evidence: The Church Commissioners' forensic research identified substantial historical holdings and financial income linked to these instruments.

Principal significance: Provides the central financial connection underlying the Commissioners' institutional response.

Classification: PR / AR.

Status: Documented in published research.

Outstanding requirement: Retain the original investment schedules, dates, holdings, income entries and calculation methodology.

Related substantive sections: 11–14.

A.10. Historical benefactions

Master Evidence ID: SPIRE-HIS-004

Subject: Benefactions from individuals associated with slavery-derived wealth.

Evidence: The historical research examined benefactions, including connections associated with Edward Colston and other historical individuals.

Principal significance: Establishes a second strand of research beyond securities held in the South Sea Company.

Classification: AR.

Status: Documented within the research's stated scope.

Outstanding requirement: Verify each benefaction individually, including amount, date, source, recipient and subsequent asset treatment.

Related substantive sections: 11 and 12.

A.11. Historical financial comparison figures

Master Evidence ID: SPIRE-HIS-005

Subject: Present-day illustrative financial equivalents.

Evidence: The research and related forensic-accounting accounts discuss modern comparisons involving substantial historical investment holdings and income, including approximately £443 million and £1.4 billion respectively.

Principal significance: Illustrates the scale of historical financial activity.

Classification: AR / IR.

Status: Published illustrative estimates.

Outstanding requirement: Verify the precise calculation method, base dates, original amounts and whether the figures overlap.

Important qualification: These are not established contemporary assets available for payment or automatically calculated reparatory liabilities.

Related substantive sections: 12 and 14.

A.12. Institutional succession in 1948

Master Evidence ID: SPIRE-HIS-006

Subject: Relationship between Queen Anne's Bounty and the Church Commissioners.

Evidence: Queen Anne's Bounty and the Ecclesiastical Commissioners were brought together in 1948 to form the Church Commissioners.

Principal significance: Establishes the institutional succession relevant to the historical financial enquiry.

Classification: PR / AR.

Status: Documented.

Outstanding requirement: Preserve the relevant statutory and historical documentation and avoid assuming uninterrupted tracing of every historical asset without records.

Related substantive sections: 11 and 12.

A.13. Commencement of modern forensic research

Master Evidence ID: SPIRE-HIS-007

Subject: Beginning of the Church Commissioners' research.

Evidence: The Commissioners state that the relevant investigation began in 2019.

Principal significance: Establishes the starting point for the modern Project Spire chronology and preparatory expenditure.

Classification: OS.

Status: Documented official position.

Outstanding requirement: Obtain original commissioning decisions, terms of reference and complete research-contract chronology.

Related substantive sections: 11, 12, 19 and 20.

A.14. June 2022 publication

Master Evidence ID: SPIRE-HIS-008

Subject: Initial public announcement of historical findings.

Evidence: The Church Commissioners published an initial announcement in June 2022 acknowledging historical financial connections.

Principal significance: Establishes public institutional recognition preceding the 2023 financial commitment.

Classification: PR / OS.

Status: Documented.

Principal source:

https://www.churchofengland.org/media/press-releases/church-commissioners-research-identifies-historic-links-transatlantic-chattel

Related substantive sections: 5 and 11.

A.15. January 2023 full historical report

Master Evidence ID: SPIRE-HIS-009

Subject: Publication of fuller research.

Evidence: The Commissioners published their full historical research report in January 2023.

Principal significance: Establishes the documentary basis used by the institution to explain its response.

Classification: PR / AR / OS.

Status: Documented.

Principal source:

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Outstanding requirement: Preserve the complete original report, appendices, historical sources and subsequent academic critiques.

Related substantive sections: 11–14.

PART II — FINANCIAL COMMITMENT AND DELIVERY

A.16. Original £100 million commitment

Master Evidence ID: SPIRE-FIN-001

Subject: Original reparatory commitment.

Evidence: On 10 January 2023, the Church Commissioners announced a commitment of £100 million over nine years.

Classification: PR / OS.

Status: Established as an institutional commitment.

Critical limitation: The announcement does not establish completed payments to ultimate beneficiaries.

Principal source: January 2023 Church Commissioners announcement.

Related substantive sections: 11, 13, 14, 19 and 24.

A.17. The investment-led reparatory model

Master Evidence ID: SPIRE-FIN-002

Subject: Proposed investment and grant-making approach.

Evidence: The proposed programme envisages impact investment, future grant-making and broader reparatory activity.

Classification: OS / PR.

Status: Documented programme intention.

Outstanding requirement: Verify current investment policy, actual capital deployment, beneficiaries and measurable outcomes.

Related substantive sections: 13, 14 and 19.

A.18. Individual compensation distinction

Master Evidence ID: SPIRE-FIN-003

Subject: Whether the fund represents direct individual compensation.

Evidence: The Commissioners distinguish their proposed reparative justice programme from direct individual compensation.

Classification: OS.

Status: Documented institutional position.

Critical limitation: An investment programme must not be publicly described as a direct compensation scheme without supporting evidence.

Related substantive sections: 13 and 14.

A.19. The £1 billion-plus ambition

Master Evidence ID: SPIRE-FIN-004

Subject: Proposed enlargement of reparatory resources.

Evidence: The Oversight Group recommended developing the programme towards £1 billion or more.

Classification: PR / OS.

Status: Documented recommendation.

Critical limitation: The Church Commissioners' own commitment remained £100 million; the larger ambition is not proof that £1 billion has been secured.

Related substantive sections: 13, 14 and 24.

A.20. The Commissioners' endowment

Master Evidence ID: SPIRE-FIN-005

Subject: Institutional financial capacity.

Evidence: The Commissioners reported an endowment valuation of £11.6 billion at 31 December 2025.

Classification: PR / OS.

Status: Published financial result.

Critical limitation: Endowment valuation is not equivalent to unrestricted cash available for immediate distribution.

Outstanding requirement: Preserve the original annual report and examine the relevant legal and financial restrictions.

Related substantive sections: 14.

A.21. Original commitment calculation

Master Evidence ID: SPIRE-FIN-006

Subject: Basis for selecting £100 million.

Evidence: The Commissioners have provided institutional explanations concerning proportionality and wider financial obligations.

Classification: OS.

Status: General rationale documented; full underlying calculation not obtained.

Outstanding requirement: Obtain Board decision records, relevant financial assessments and any comparison of alternative amounts.

Related substantive sections: 13, 14 and 22.

A.22. Preparatory expenditure through December 2024

Master Evidence ID: SPIRE-FIN-007

Subject: Expenditure incurred before the proposed fund became operational.

Evidence: The Commissioners reported approximately £1 million spent between 2019 and 31 December 2024.

Classification: PA / OS.

Status: Official aggregate expenditure statement.

Important qualification: Internal staff time was excluded.

Principal source:

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

Outstanding requirement: Itemised categories, later annual expenditure and staff-cost treatment.

Related substantive sections: 19 and 20.

A.23. Disputed £5 million expenditure claim

Master Evidence ID: SPIRE-FIN-008

Subject: Parliamentary claim concerning alleged expenditure.

Evidence: A parliamentary question referred to £5 million in past spending; the Commissioners rejected that figure.

Classification: PA / CT.

Status: Claim disputed; not established as actual expenditure.

Principal source:

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

Outstanding requirement: Reconcile actual expenditure from underlying accounts.

Related substantive sections: 19 and 23.

A.24. Disputed £5 million forecast

Master Evidence ID: SPIRE-FIN-009

Subject: Alleged 2026–28 spending forecast.

Evidence: The Commissioners stated that they did not recognise the £5 million forecast referred to in parliamentary questioning.

Classification: PA / CT.

Status: Alleged forecast not established.

Principal source:

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

Outstanding requirement: Actual approved programme-development forecasts.

Related substantive sections: 19.

A.25. Capital retained in the general fund

Master Evidence ID: SPIRE-FIN-010

Subject: Location of the £100 million commitment pending authorisation.

Evidence: In September 2025, the Commissioners stated that the £100 million remained within their general fund pending regulatory approval.

Classification: PA / OS.

Status: Established as the institution's dated position.

Critical limitation: Must not automatically be treated as the current position without a fresh check.

Related substantive sections: 13, 15 and 19.

A.26. Complete financial transfers

Master Evidence ID: SPIRE-FIN-011

Subject: Movement of the £100 million into a separate entity.

Evidence: A complete, current transfer schedule has not been obtained.

Classification: OR / UV.

Status: Outstanding.

Required documents: Regulatory authorisation, Board approval, transaction records, receiving-entity accounts and transfer dates.

Related substantive sections: 13, 15, 19 and 24.

A.27. Completed investments

Master Evidence ID: SPIRE-FIN-012

Subject: Actual impact investments.

Evidence: The proposed investment model is documented, but a verified schedule of completed fund investments has not been obtained.

Classification: OR / UV.

Status: Not established through the sources examined.

Required documents: Investment register, capital amounts, transaction dates, recipients, instruments and audited reporting.

Related substantive sections: 13, 14 and 19.

A.28. Completed grants

Master Evidence ID: SPIRE-FIN-013

Subject: Grant-making to affected organisations and communities.

Evidence: Proposed grant-making arrangements have been described publicly.

Classification: OS / OR.

Status: Grant-making intention documented; completed grants not independently established.

Required documents: Award notices, payment schedules, recipient confirmations and programme accounts.

Related substantive sections: 13 and 19.

A.29. Verified reparatory receipt

Master Evidence ID: SPIRE-FIN-014

Subject: Value actually reaching affected beneficiaries.

Evidence: No complete independently verified beneficiary-receipt register has been obtained.

Classification: OR / UV.

Status: Outstanding.

Required documents: Recipient acknowledgements, independently audited transaction records and outcome assessments, subject to lawful confidentiality protections.

Related substantive sections: 13, 14, 19 and 24.

PART III — LEGAL AND REGULATORY EVIDENCE

A.30. Charities Act 2011

Master Evidence ID: SPIRE-LEG-001

Subject: Statutory framework relevant to the proposed financial arrangements.

Evidence: The Commissioners have discussed a proposed ex gratia authorisation route under section 106.

Classification: PR / PA.

Status: Statutory framework established; application to the proposed transaction requires authoritative assessment.

Source:

https://www.legislation.gov.uk/ukpga/2011/25/contents

Related substantive sections: 15 and 24.

A.31. Proposed section 106 authorisation

Master Evidence ID: SPIRE-LEG-002

Subject: Ex gratia payment based upon moral obligation.

Evidence: Parliamentary responses identified the Commissioners' proposed reliance upon section 106.

Classification: PA / OS.

Status: Proposed legal route documented.

Outstanding requirement: Current application status, regulator's decision and any conditions.

Related substantive sections: 15, 22 and 24.

A.32. Registration of a separate charity

Master Evidence ID: SPIRE-LEG-003

Subject: Proposed Fund for Healing, Repair and Justice legal entity.

Evidence: The Commissioners publicly described steps towards registering a new charity.

Classification: OS / PA.

Status: Institutional intention documented.

Outstanding requirement: Verify current registration status, charity number, trustees and governing document.

Verification source:

https://register-of-charities.charitycommission.gov.uk/

Related substantive sections: 15 and 16.

A.33. Regulatory chronology

Master Evidence ID: SPIRE-LEG-004

Subject: Communications and applications involving the Charity Commission.

Evidence: Parliamentary records identify informal discussions and proposed registration and authorisation steps.

Classification: PA / OS.

Status: Partial chronology documented.

Outstanding requirement: Complete dated application and decision schedule through the latest available date.

Related substantive sections: 15, 21 and 22.

A.34. Official operational status

Master Evidence ID: SPIRE-LEG-005

Subject: Whether the proposed fund is operational.

Evidence: The Commissioners' published enquiry and FAQ pages describe the fund as not yet operational.

Classification: OS.

Status: Dated public institutional position.

Critical qualification: A non-operational fund may nevertheless have undergone preparatory governance and legal work.

Source:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Related substantive sections: 13, 15 and 24.

A.35. Parliamentary legal scrutiny

Master Evidence ID: SPIRE-LEG-006

Subject: Questions concerning trustee obligations and legal authority.

Evidence: Parliamentary answers describe the Commissioners' assessment of their duties and the need for regulatory processes.

Classification: PA.

Status: Documented public scrutiny.

Principal source:

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88600

Related substantive sections: 15 and 23.

A.36. Reported October 2026 legal challenge

Master Evidence ID: SPIRE-LEG-007

Subject: Opposition to the proposed fund's legal basis.

Evidence: Contemporary reporting identifies a legal challenge being pursued concerning Project Spire.

Classification: SR / CT.

Status: Reported challenge; procedural status requires primary verification.

Critical qualification: A proposed challenge is not a final court determination of unlawfulness.

Outstanding requirement: Obtain filed court papers, procedural orders and authoritative case status if proceedings have commenced.

Related substantive sections: 15 and 23.

PART IV — GOVERNANCE AND OVERSIGHT

A.37. Church Commissioners' Board of Governors

Master Evidence ID: SPIRE-GOV-001

Subject: Institutional authority over the programme.

Evidence: The Board approved the original commitment and considered the Oversight Group's recommendations.

Classification: OS / PR.

Status: Documented.

Outstanding requirement: Relevant formal resolutions, delegation schedules and current authority chart.

Related substantive sections: 13, 15 and 16.

A.38. Establishment of the independent Oversight Group

Master Evidence ID: SPIRE-GOV-002

Subject: Appointment and role of the advisory group.

Evidence: The Commissioners announced the Oversight Group's membership in 2023.

Classification: PR / OS.

Status: Documented.

Source:

https://www.churchofengland.org/media/press-releases/church-commissioners-announce-members-oversight-group-advise-response-historic

Related substantive sections: 8, 13 and 16.

A.39. Oversight Group recommendations

Master Evidence ID: SPIRE-GOV-003

Subject: Recommendations concerning fund structure, scale and community involvement.

Evidence: The Group's report was published in March 2024.

Classification: PR.

Status: Documented advisory recommendations.

Source:

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Outstanding requirement: Verify which recommendations were implemented, amended or remain outstanding.

Related substantive sections: 13, 14, 16 and 17.

A.40. Governance Workstream

Master Evidence ID: SPIRE-GOV-004

Subject: Development of a proposed charitable entity.

Evidence: The Commissioners' March 2025 implementation update identifies a Governance Workstream.

Classification: OS.

Status: Documented programme-development activity.

Outstanding requirement: Workstream membership, outputs, authority and resulting governing documents.

Related substantive sections: 16 and 20.

A.41. Impact Investment Workstream

Master Evidence ID: SPIRE-GOV-005

Subject: Development of investment arrangements.

Evidence: The Commissioners' implementation update identifies an Impact Investment Workstream.

Classification: OS.

Status: Documented preparatory structure.

Outstanding requirement: Final investment policy, approval powers, risk management and actual transactions.

Related substantive sections: 13, 16 and 19.

A.42. Grant-Making Workstream

Master Evidence ID: SPIRE-GOV-006

Subject: Development of grant-making procedures.

Evidence: The March 2025 update identifies a Grant-Making Workstream.

Classification: OS.

Status: Documented preparatory structure.

Outstanding requirement: Eligibility rules, decision procedures, independent review and actual grant awards.

Related substantive sections: 13, 16 and 19.

A.43. Theology Workstream

Master Evidence ID: SPIRE-GOV-007

Subject: Theological and ethical dimensions of the reparatory response.

Evidence: The Church Commissioners' implementation update identifies a Theology Workstream.

Classification: OS.

Status: Documented.

Outstanding requirement: Establish how theological recommendations influence, but remain distinct from, legal and financial decisions.

Related substantive sections: 16.

A.44. Proposed Black community leadership

Master Evidence ID: SPIRE-GOV-008

Subject: Black-led governance and eventual community ownership.

Evidence: The Oversight Group recommended governance centred upon affected communities.

Classification: PR / OS.

Status: Recommendation documented; final legal implementation unverified.

Outstanding requirement: Governing document, trustee appointment powers, reserved powers and community accountability arrangements.

Related substantive sections: 16, 17 and 24.

A.45. Delegated authority

Master Evidence ID: SPIRE-GOV-009

Subject: Authority to approve expenditure, contracts, investments and grants.

Evidence: A complete current delegation schedule has not been obtained.

Classification: OR / UV.

Status: Outstanding.

Required records: Board delegation instruments, committee terms of reference, approval limits and fund governance documents.

Related substantive sections: 16 and 20.

PART V — CONSULTATION AND REPRESENTATION

A.46. Reported consultation participation

Master Evidence ID: SPIRE-CON-001

Subject: Consultation undertaken during 2023.

Evidence: The Commissioners report 1,106 participants through combined engagement routes and a global survey.

Classification: OS / PR.

Status: Published institutional figure.

Outstanding requirement: Confirm whether the count represents unique individuals and obtain the complete methodology.

Related substantive sections: 17 and 23.

A.47. Geographical engagement

Master Evidence ID: SPIRE-CON-002

Subject: Consultation in England, Jamaica, Barbados and Ghana.

Evidence: The Oversight Group report describes relevant engagement activities.

Classification: PR.

Status: Published consultation record.

Outstanding requirement: Detailed event lists, participation categories and selection methods.

Related substantive sections: 17.

A.48. Global questionnaire distribution

Master Evidence ID: SPIRE-CON-003

Subject: Geographical distribution of questionnaire respondents.

Evidence: The Oversight Group published regional percentages, with a majority of respondents in Europe, predominantly the United Kingdom.

Classification: PR.

Status: Documented survey results.

Critical qualification: The distribution must not be treated as a representative demographic survey of the global African diaspora without methodological support.

Related substantive sections: 17.

A.49. Original consultation methodology

Master Evidence ID: SPIRE-CON-004

Subject: Methods used to identify and engage participants.

Evidence: General information is available through Oversight Group materials.

Classification: PR / OR.

Status: Partly documented.

Outstanding requirement: Complete methodology, outreach channels, invitations, accessibility measures and respondent-count reconciliation.

Related substantive sections: 17 and 22.

A.50. Grassroots participation

Master Evidence ID: SPIRE-CON-005

Subject: Participation by independent Black/Afrikan reparations organisations.

Evidence: The consultation included affected communities, but the complete list of relevant grassroots organisations has not been established.

Classification: OR / UV.

Status: Further verification required.

Outstanding requirement: Appropriate organisational participation records and continuing consultation opportunities.

Related substantive sections: 17.

A.51. Consultation and consent distinction

Master Evidence ID: SPIRE-CON-006

Subject: Whether consultation establishes institutional endorsement.

Evidence: Participation occurred, but universal community consent has not been demonstrated.

Classification: NE.

Status: No finding of universal consent.

Critical principle: Consultation does not automatically equal representation, endorsement or decision-making authority.

Related substantive sections: 16, 17 and 23.

PART VI — PROFESSIONAL ROLES AND ORGANISATIONAL NETWORKS

A.52. Grant Thornton UK LLP

Master Evidence ID: SPIRE-PER-001

Subject: Professional forensic accounting assignment.

Evidence: Grant Thornton's involvement is documented in the historical research and its own published account.

Classification: PR / OS.

Status: Confirmed professional role.

Outstanding requirement: Total fee reconciliation, contractual scope and relevant procurement records.

Source:

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

Related substantive sections: 12, 19 and 20.

A.53. Academic research contributors

Master Evidence ID: SPIRE-PER-002

Subject: Historians and academic institutions supporting the research.

Evidence: The published research and related material identify professional historical input.

Classification: AR / OS.

Status: Documented participation.

Outstanding requirement: Distinguish academic authorship, research collaboration, professional consultancy and paid appointments.

Related substantive sections: 12 and 20.

A.54. Lambeth Palace Library

Master Evidence ID: SPIRE-PER-003

Subject: Institutional setting for archival work.

Evidence: Published records identify Project Spire-related archival research.

Classification: PR / FP.

Status: Documented.

Outstanding requirement: Clarify employing or commissioning institutions, programme budgets and supervision.

Source:

https://www.lambethpalacelibrary.info/

Related substantive sections: 7 and 20.

A.55. Dr Annabelle Gilmore

Master Evidence ID: SPIRE-PER-004

Subject: Archival research and coordination.

Evidence: Public accounts identify her involvement in Project Spire-related archival work.

Classification: FP / OS.

Status: Documented professional participation.

Outstanding requirement: Verify exact appointment terms, period, commissioning institution and duties.

Related substantive sections: 7 and 20.

A.56. Kwesi Ochosi

Master Evidence ID: SPIRE-PER-005

Subject: Project Spire archival coordination.

Evidence: A September 2026 Lambeth Palace Library publication identifies Kwesi Ochosi as Project Spire Coordinator: Archives.

Classification: PR / OS.

Status: Publicly documented role.

Critical limitation: The role does not by itself establish financial authority over the proposed £100 million fund.

Outstanding requirement: Original institutional publication, appointment terms, supervision, remuneration classification and relevant external-interest procedures.

Related substantive sections: 4, 7, 20 and 24.

A.57. Charmaine Simpson

Master Evidence ID: SPIRE-PER-006

Subject: Church Commissioners research and engagement role.

Evidence: Published Church-related material identifies Charmaine Simpson as a Research and Engagement Coordinator.

Classification: PR / OS.

Status: Publicly documented professional role.

Outstanding requirement: Formal appointment terms, commissioning institution, period, budgetary authority and external-interest procedures.

Source:

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

Related substantive sections: 4, 6 and 20.

A.58. Black History Studies

Master Evidence ID: SPIRE-PER-007

Subject: Organisational affiliation of Charmaine Simpson.

Evidence: Her organisational leadership is publicly documented.

Classification: OS.

Status: Affiliation documented.

Critical limitation: The affiliation does not establish that Black History Studies received Project Spire funding.

Outstanding requirement: Confirmation of any relevant contractual or financial relationship.

Related substantive sections: 6, 8 and 20.

A.59. Building Trust Consortium

Master Evidence ID: SPIRE-PER-008

Subject: Organisational association of Kwesi Ochosi.

Evidence: Public materials identify his association with the organisation.

Classification: OS / SR.

Status: Public organisational association documented; precise legal structure requires confirmation.

Critical limitation: Association alone does not establish a Project Spire contract or payment.

Related substantive sections: 7, 8 and 20.

A.60. Global Reparations Hub launch

Master Evidence ID: SPIRE-GRH-001

Subject: GRH launch at the UK Reparations Conference on 17 October 2026.

Evidence: The published conference programme identifies the launch and relevant participants.

Classification: PR.

Status: Public event arrangements documented.

Source:

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

Critical limitation: Event participation is not proof of formal Church Commissioners sponsorship or control.

Related substantive sections: 5, 9 and 20.

A.61. Project Spire–GRH financial relationship

Master Evidence ID: SPIRE-GRH-002

Subject: Possible funding or contractual connection.

Evidence: The examined materials establish overlapping professional involvement but do not establish relevant financial transfers.

Classification: NE / OR.

Status: Not established.

Outstanding requirement: Written confirmation from the responsible institutions and any supporting contracts or accounts.

Related substantive sections: 8, 19, 20 and 22.

A.62. Project Spire–GRH governance relationship

Master Evidence ID: SPIRE-GRH-003

Subject: Possible common institutional control.

Evidence: A common governing structure has not been demonstrated through the available documents.

Classification: NE / OR.

Status: Not established.

Outstanding requirement: Formal governing documents, delegation records or authoritative institutional clarification.

Related substantive sections: 8, 16 and 23.

PART VII — SAFEGUARDS, COMMUNICATIONS AND ACCOUNTABILITY

A.63. Church of England racial-justice framework

Master Evidence ID: SPIRE-SAF-001

Subject: Wider institutional racial-justice commitments.

Evidence: The Church published *From Lament to Action* and established the Archbishops' Commission for Racial Justice.

Classification: PR / OS.

Status: Documented.

Source:

https://www.churchofengland.org/about/racial-justice

Critical limitation: Church-wide policy does not automatically prove the effective operation of Project Spire-specific safeguards.

Related substantive sections: 18.

A.64. Commission reference to Project Spire

Master Evidence ID: SPIRE-SAF-002

Subject: Racial-justice scrutiny concerning Project Spire.

Evidence: The Archbishops' Commission for Racial Justice referred to Project Spire in its 2023 reporting and emphasised the importance of Africa, the Caribbean and the diaspora.

Classification: PR / OS.

Status: Documented institutional comment.

Outstanding requirement: Establish whether this resulted in specific governance or safeguards changes.

Related substantive sections: 18.

A.65. Equality Act 2010

Master Evidence ID: SPIRE-SAF-003

Subject: Statutory protections against racial discrimination.

Evidence: The Equality Act 2010 establishes relevant legal protections, depending on the body, activity and statutory provisions concerned.

Classification: PR.

Status: Established legislation.

Source:

https://www.legislation.gov.uk/ukpga/2010/15/contents

Outstanding requirement: Confirm which provisions apply to each relevant Project Spire institution and decision.

Related substantive sections: 18.

A.66. Project-specific safeguards

Master Evidence ID: SPIRE-SAF-004

Subject: Safeguards against anti-Black racism and Institutional Racism.

Evidence: A comprehensive project-specific safeguards dossier has not been obtained.

Classification: OR / UV.

Status: Outstanding.

Required records: Policies, risk assessments, responsibility charts, complaints procedures, monitoring and independent review.

Important qualification: An absence of evidence supplied to RNL is not proof that the institution possesses no safeguards.

Related substantive sections: 18, 22 and 24.

A.67. Complaints and appeals

Master Evidence ID: SPIRE-SAF-005

Subject: Procedures for challenging decisions.

Evidence: A complete, project-specific independent complaints and appeals framework has not been established.

Classification: OR / UV.

Status: Outstanding.

Required records: Complaint routes, response standards, independent review, appeal procedures and protections against victimisation.

Related substantive sections: 18 and 21.

A.68. Public enquiries and response aim

Master Evidence ID: SPIRE-COM-001

Subject: Official communication arrangements.

Evidence: The Commissioners maintain a feedback page and state an aim to respond within 30 working days.

Classification: OS.

Status: Published institutional service aim.

Critical limitation: The existence of an aim is not proof that every enquiry receives a complete response within that period.

Source:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Related substantive sections: 21.

A.69. Public research and FAQ pages

Master Evidence ID: SPIRE-COM-002

Subject: Public accessibility of Project Spire documents.

Evidence: The Commissioners publish research, FAQs, related documents and institutional responses.

Classification: PR / OS.

Status: Established publication framework.

Outstanding requirement: Evaluate version history, correction procedures and completeness of current information.

Related substantive sections: 21.

A.70. Parliamentary responses

Master Evidence ID: SPIRE-COM-003

Subject: Parliamentary scrutiny and disclosure.

Evidence: Official parliamentary records contain responses concerning expenditure, legal processes, governance and institutional rationale.

Classification: PA.

Status: Documented.

Critical requirement: Preserve the original question and date of every answer.

Related substantive sections: 15, 19, 21 and 23.

PART VIII — MATERIAL OUTSTANDING EVIDENCE

A.71. Complete current financial reconciliation

Master Evidence ID: SPIRE-ACT-001

Required from: Church Commissioners.

Documents requested: Project Spire expenditure from 2019 through October 2026 or the latest available reporting date, including accounting categories and explanations of excluded costs.

Purpose: Establish the total cost of preparatory activity and reconcile publicly reported figures.

Status: Outstanding.

A.72. Current £100 million status

Master Evidence ID: SPIRE-ACT-002

Required from: Church Commissioners and any established recipient fund.

Documents requested: Original authorisation, present accounting designation, regulatory authority, transfers, investments and grant schedule.

Purpose: Determine what financial activity has occurred.

Status: Outstanding.

A.73. Charity Commission decision records

Master Evidence ID: SPIRE-ACT-003

Required from: Charity Commission and Church Commissioners.

Documents requested: Registration applications, section 106 application, decisions and conditions, if any.

Purpose: Establish current legal authority.

Status: Outstanding.

A.74. Current governance chart

Master Evidence ID: SPIRE-ACT-004

Required from: Church Commissioners and any established fund entity.

Documents requested: Trustee appointments, committee arrangements, delegated powers and governing documents.

Purpose: Identify who controls decisions.

Status: Outstanding.

A.75. Complete professional appointments register

Master Evidence ID: SPIRE-ACT-005

Required from: Church Commissioners, Lambeth Palace Library and relevant commissioning institutions.

Documents requested: Professional appointments, institutional responsibilities, dates and appropriately disclosable remuneration or contract information.

Purpose: Distinguish professional participation from authority and finance.

Status: Outstanding.

A.76. Consultation and representation records

Master Evidence ID: SPIRE-ACT-006

Required from: Church Commissioners or authorised consultation custodian.

Documents requested: Complete methodology, anonymised participation data, organisational engagement information and later consultation updates.

Purpose: Examine accessibility, representativeness and influence.

Status: Outstanding.

A.77. Anti-racism safeguards dossier

Master Evidence ID: SPIRE-ACT-007

Required from: Church Commissioners and any proposed separate fund.

Documents requested: Safeguards policies, equality assessments where applicable, complaints procedures, conflict-management policies and evidence of independent scrutiny.

Purpose: Examine protections against the possibility of anti-Black racism and Institutional Racism.

Status: Outstanding.

A.78. Project Spire–GRH relationship confirmation

Master Evidence ID: SPIRE-ACT-008

Required from: Relevant institutions.

Documents requested: Written confirmation of any contracts, grants, sponsorship, governing arrangements or formal collaborations.

Purpose: Resolve the question of institutional overlap without merging separate investigations.

Status: Outstanding.

A.79. Independent financial delivery verification

Master Evidence ID: SPIRE-ACT-009

Required from: Any legally established fund and appropriate financial custodians.

Documents requested: Financial statements, investment registers, grant records and independently verifiable beneficiary outcomes.

Purpose: Distinguish commitment from delivery.

Status: Outstanding.

A.80. Institutional right of reply

Master Evidence ID: SPIRE-ACT-010

Required action: Issue relevant questions and documented findings to responsible institutions and materially affected individuals.

Purpose: Permit factual correction, alternative explanation and additional evidence before final conclusions.

Status: To be undertaken.

PART IX — EVIDENCE HANDLING AND QUALITY CONTROL

A.81. Preservation of original files

The investigation should preserve original files rather than rely exclusively on extracts.

Where a PDF report is used, its full title, source and date should be recorded.

Where an email is relevant, the full communication should be preserved where lawfully available.

Where a webpage changes, the date of the version examined should be retained.

The purpose is to protect context.

An extract may omit qualifications contained elsewhere in the source.

A.82. Preservation of uncertainty

A register entry should not become more certain merely because it appears in several sections.

For example, a question about whether Project Spire funded the GRH remains unverified until financial or institutional evidence establishes the answer.

Repeated discussion is not independent corroboration.

The register should therefore preserve the same evidential classification until new evidence justifies changing it.

A.83. Preservation of the right of reply

Where a material finding concerns an institution or individual, the relevant party should be invited to explain or correct the evidence.

A response should be preserved in its original form.

Where it alters a finding, the change should be recorded.

Where it disputes an interpretation, the competing evidence should be examined fairly.

Silence is not automatically proof of wrongdoing.

A.84. Preservation of the distinction between risk and wrongdoing

The investigation identifies possible risks concerning financial transparency, governance, conflicts of interest and Institutional Racism.

These are matters requiring safeguards.

They should not automatically be treated as established incidents.

A finding of wrongdoing requires evidence addressing a specific act, duty, decision or relevant institutional practice.

The register must maintain that distinction.

A.85. Preservation of financial categories

Financial entries must distinguish the nature of the transaction.

The original £100 million commitment must not be counted as a beneficiary payment.

A capital allocation must not automatically be counted as expenditure.

An investment must not automatically be counted as compensation.

A grant award must not be counted as received unless the payment is established.

Receipt must not automatically be counted as a verified programme outcome.

The objective is an accurate and independently reconcilable money trail.

A.86. Preservation of institutional boundaries

Project Spire, the Global Reparations Hub and the Black Cultural Centre investigations remain separate.

A document may be relevant to more than one investigation.

However, that relevance should be identified precisely.

Professional overlap should not automatically establish common financial control.

An event organised by one body should not be attributed to another without evidence.

The purpose is institutional accuracy.

A.87. Corrections protocol

Where an error is identified, the investigation should record the original statement, evidence requiring correction, revised statement and date.

Where possible, the previous version should remain traceable.

Corrections should not be concealed.

The objective is a transparent history of the development of the investigation.

A.88. Future evidence additions

New material should receive the next available master identifier within the relevant category.

Existing identifiers should not be reused.

New evidence should be linked to the substantive sections it affects.

Where a finding changes, the register should identify the correction.

This permits the investigation to continue without destroying its original documentary structure.

PART X — MASTER REFERENCE SOURCES

A.89. Core historical and institutional sources

A-SRC-001 — Church Commissioners' historical information hub

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/church-commissioners-links-african-chattel-enslavement

A-SRC-002 — Church Commissioners' historical findings

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/what-we-know

A-SRC-003 — Church Commissioners' related documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

A-SRC-004 — January 2023 research and financial announcement

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

A-SRC-005 — Grant Thornton historical accounting account

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

A.90. Core financial and governance sources

A-SRC-006 — Oversight Group report

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

A-SRC-007 — Commissioners' response to Oversight Group

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

A-SRC-008 — March 2025 implementation update

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

A-SRC-009 — Commissioners' annual publications

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

A-SRC-010 — Commissioners' FAQs

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

A.91. Core parliamentary and regulatory sources

A-SRC-011 — Project Spire expenditure, Question 65336

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

A-SRC-012 — Disputed expenditure, Question 63009

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

A-SRC-013 — Financial and regulatory status, Question 69330

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

A-SRC-014 — Trustee and legal responsibilities, Question 88600

https://questions-statements.parliament.uk/written-questions/detail/2025-11-10/88600

A-SRC-015 — Charities Act 2011

https://www.legislation.gov.uk/ukpga/2011/25/contents

A-SRC-016 — Charity Commission register

https://register-of-charities.charitycommission.gov.uk/

A.92. Core community, professional and safeguarding sources

A-SRC-017 — Church of England racial-justice framework

https://www.churchofengland.org/about/racial-justice

A-SRC-018 — Equality Act 2010

https://www.legislation.gov.uk/ukpga/2010/15/contents

A-SRC-019 — Church Commissioners' public enquiry mechanism

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

A-SRC-020 — Lambeth Palace Library

https://www.lambethpalacelibrary.info/

A-SRC-021 — Archival placement account

https://www.memslib.co.uk/post/a-glimpse-into-the-archive-my-placement-at-lambeth-palace-library

A-SRC-022 — Diocese of Southwark programme

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

A-SRC-023 — UK Reparations Conference 2026 agenda

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

A-SRC-024 — Church Commissioners' parliamentary response, January 2026

https://www.churchofengland.org/media/news-and-press-releases/church-commissioners-england-responds-parliamentarians-letter-regarding-fund-healing-justice-and

These references form the preliminary master source list. They should be checked for URL accuracy, complete titles, original document dates and any superseding versions during final verification. An index entry establishes what source is intended to be consulted; it is not a claim that every linked page was freshly accessed or independently reverified for this appendix.

PART XI — CONSOLIDATED EVIDENTIAL ASSESSMENT

A.93. Matters established by the initial investigation

The investigation has established that the Church Commissioners conducted historical research concerning financial connections with African chattel enslavement.

It has established that Queen Anne's Bounty's historical financial activities formed an important subject of that research.

It has established the announcement of a £100 million institutional reparatory commitment.

It has established the appointment of an independent Oversight Group and publication of recommendations.

It has established that the Commissioners developed investment, grant-making, governance and theological workstreams.

It has established preparatory expenditure reported through December 2024.

It has established certain professional roles and overlapping participation in separate reparations initiatives.

These findings provide the documentary foundation for continued examination.

A.94. Matters established only as institutional positions

Several important propositions are documented as statements made by the Church Commissioners.

These include explanations of the proposed financial model, the original funding rationale, regulatory development and intended governance arrangements.

Such statements should be quoted or summarised accurately as institutional positions.

Where they concern actual transactions, current legal authority or achieved outcomes, additional primary records may be necessary for independent verification.

The evidential register must preserve this distinction.

A.95. Matters remaining contested

The interpretation of aspects of the historical financial research has attracted criticism.

The adequacy and legality of the proposed reparatory response have also been questioned.

The Commissioners have defended their position.

These disagreements should be preserved with their supporting evidence.

The investigation should not convert the existence of criticism into a finding that the Commissioners acted improperly.

Nor should it treat the Commissioners' response as ending all legitimate enquiry.

Each contested matter should be examined according to the evidence.

A.96. Matters not established

The evidence examined does not establish that the Church Commissioners formally controlled the Global Reparations Hub.

It does not establish that the GRH received Project Spire funding.

It does not establish that the identified professional overlaps constituted improper conflicts of interest.

It does not establish that the announced £100 million has been delivered to affected communities.

It does not establish that named individuals committed wrongdoing.

These are not findings that the relevant events could never have occurred.

They identify the limits of what has been established through the available evidence.

A.97. Matters requiring further documentary verification

The principal outstanding requirements concern current regulatory status, fund registration, legal authorisation, complete financial expenditure, professional contracts,

delegated powers, community governance, consultation methodology, safeguards and independently verified reparatory delivery.

These requirements should now be pursued through the formal institutional disclosure programme established in Section 22.

The investigation should avoid reopening settled factual questions unnecessarily.

The next phase should concentrate upon obtaining documents capable of materially changing or completing the evidential position.

A.98. Anti-Black racism and Institutional Racism safeguards

RNL specifically seeks evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism.

The Church of England's wider racial-justice framework is documented.

However, the investigation has not obtained a complete Project Spire-specific account demonstrating the effective operation of the relevant safeguards.

This matter remains open.

The absence of evidence supplied to RNL must not be misrepresented as proof that no safeguards exist.

Equally, the existence of general institutional policies should not automatically end the enquiry into their practical application.

A.99. Financial delivery remains the decisive practical test

The investigation must distinguish the promise of reparatory resources from their actual delivery.

A commitment may be significant without having been transferred.

An investment may support economic activity without being direct compensation.

A grant may be awarded without its intended outcomes being achieved.

The financial evidence must therefore be followed through to verified receipt and benefit.

This is essential to evaluating the practical consequences of Project Spire.

A.100. Institutional fairness and the right of reply

The investigation should provide relevant institutions and individuals with a fair opportunity to correct material facts.

Their responses should be preserved.

Where evidence changes, the findings should be updated.

Where material remains contested, the disagreement should be accurately recorded.

Silence should not be treated automatically as wrongdoing.

The purpose is a reliable and professionally defensible record.

PART XII — APPENDIX A FORMAL CONCLUSION

A.101. Conclusion of the master evidence register

The Project Spire investigation now possesses a structured body of documentary evidence covering historical financial connections, institutional commitments, legal and regulatory processes, governance, consultation, professional activities, public communications and safeguarding questions.

This appendix consolidates the principal evidence into a master reference system.

Its purpose is to permit every material finding to be traced to supporting documents and to distinguish established facts from unresolved questions.

The register confirms that the Church Commissioners undertook historical research and announced a substantial reparatory commitment.

It confirms the existence of an independent Oversight Group and the development of a proposed investment and grant-making programme.

It also confirms certain professional roles and overlapping participation in other reparations initiatives.

However, the register does not establish common Project Spire–GRH governance or financing.

It does not establish completed delivery of the £100 million to affected communities.

It does not establish wrongdoing by named individuals.

It identifies substantial outstanding requirements concerning financial reconciliation, legal authority, governance and safeguards.

The central conclusion of Appendix A is that the initial investigation has developed a significant documentary foundation, but its permanent evidential integrity depends upon preserving original sources, accurately classifying claims, obtaining outstanding records, allowing fair institutional responses and maintaining transparent corrections.

The evidence register must remain capable of being updated as new documents become available.

Its classifications should change only when reliable evidence justifies the change.

RNL's objective remains an accurate, independent and peaceful investigation into the institutional delivery of reparatory justice.

APPENDIX A — STATUS CERTIFICATION

Appendix: A of F
Title: Consolidated Master Evidence Register
Prepared: 18 October 2026
Document status: Completed as a consolidated draft
Original source archive: Further assembly and verification required
Outstanding institutional disclosures: Remain open
Findings of wrongdoing: None made
Corrections: To be entered in the permanent corrections register as necessary

Prepared for and on behalf of Reparation Nation Limited

Derrick Emmanuel Lynch
Also known as John Canoe
Company Number: 14761041

The formal signature and authorisation page appears after Appendix F and is not duplicated here.

END OF APPENDIX A OF F — CONSOLIDATED MASTER EVIDENCE REGISTER

NEXT: APPENDIX B OF F — MASTER CHRONOLOGY: HISTORICAL FINANCIAL ORIGINS, PROJECT SPIRE RESEARCH, INSTITUTIONAL DECISIONS, PROFESSIONAL APPOINTMENTS, OVERSIGHT GROUP DEVELOPMENT, REGULATORY PROCESSES AND THE EVENTS OF OCTOBER 2026.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

APPENDIX B OF F

MASTER CHRONOLOGY: HISTORICAL FINANCIAL ORIGINS, PROJECT SPIRE RESEARCH, INSTITUTIONAL DECISIONS, PROFESSIONAL APPOINTMENTS, OVERSIGHT GROUP DEVELOPMENT, REGULATORY PROCESSES AND THE EVENTS OF OCTOBER 2026

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Document status: Consolidated chronological draft accompanying Sections 1–24 and Appendix A. Events with incomplete dates, disputed interpretations or unverified institutional connections are expressly distinguished from documented historical milestones.

PART I — PURPOSE, SCOPE AND CHRONOLOGICAL STANDARDS

B.1. Purpose of this appendix

This appendix provides the chronological foundation of Reparation Nation Limited's independent investigation into Project Spire.

It reconstructs the sequence of historical financial events, institutional developments, research decisions, professional activities, consultations, financial commitments, regulatory processes and contemporary reparations initiatives relevant to the investigation.

The chronology begins with the historical institutional and commercial arrangements examined in the Church Commissioners' research.

It continues through the creation of the modern Church Commissioners, the commencement of forensic research in 2019, publication of historical findings, announcement of the £100 million commitment, development of the independent Oversight Group and subsequent implementation activity.

It then examines the institutional and professional records relevant to the Global Reparations Hub launch of 17 October 2026.

The purpose is to determine not simply what happened, but **what happened first, what followed, what documentary connection exists between events and what cannot be inferred from their sequence**.

Two events occurring close together do not automatically establish that one caused the other.

Two individuals appearing in the same period do not automatically establish a formal institutional partnership.

A programme announcement does not establish that the promised programme became operational on the announcement date.

This appendix preserves those distinctions.

B.2. The importance of chronological accuracy

Chronology is essential to institutional accountability.

A financial decision may have been made before a regulatory application.

A research appointment may have begun before a public event.

An advisory recommendation may have been accepted before the governing documents required to implement it were finalised.

A public statement may describe circumstances that existed several months earlier.

These distinctions can materially affect interpretation.

The investigation must therefore record the **event date**, the **publication or disclosure date**, and the **date on which RNL examined the evidence**, where those differ.

No precise date should be invented merely to create an apparently complete sequence.

B.3. Chronological evidence categories

Code	Meaning
HD	Historical event supported by historical or institutional records
ID	Institutional decision
PA	Public announcement
RC	Research or commissioning activity
CN	Consultation or community engagement
GV	Governance development

RG	Regulatory or legal development
FN	Financial statement, commitment or transaction
PR	Professional role or appointment
EV	Public event
CR	Contemporary reporting
IQ	Investigative question or RNL correspondence
UV	Date, relationship or event detail requiring verification

These classifications indicate the nature of an entry.

They do not replace the evidence-strength classifications in Appendix A.

B.4. The separation of three timelines

The chronology maintains three distinct strands.

The first is the history of the Church Commissioners and Project Spire.

The second concerns the professional activities and institutional roles documented in connection with Project Spire.

The third concerns the separate Global Reparations Hub and Black Cultural Centre enquiries.

Events may be cross-referenced where supporting documents establish a relevant relationship.

However, their inclusion in a common chronology must not be interpreted as proof that all three projects share governance, funding or institutional responsibility.

PART II — HISTORICAL FOUNDATIONS, 1704–1948

B.5. 1704 — Establishment of Queen Anne's Bounty

Date: 1704
Classification: HD
Evidence ID: SPIRE-HIS-001

Queen Anne's Bounty was established to augment the incomes of poorer Church of England clergy.

The fund accumulated and administered financial resources for this purpose.

Its historical financial activities subsequently became a subject of the Church Commissioners' forensic investigation.

The establishment of the fund provides the starting point for understanding the institutional resources later examined in Project Spire.

The fact that Queen Anne's Bounty was established in 1704 does not itself establish that all its resources originated from enslavement.

The investigation concerns particular investments, income streams and benefactions identified through historical records.

Status: Documented.

B.6. 1711 — Establishment of the South Sea Company

Date: 1711
Classification: HD
Evidence ID: SPIRE-HIS-002

The South Sea Company was established during the early eighteenth century.

Its subsequent commercial activities included the trafficking of enslaved African people.

The Company's securities and related financial arrangements are important to the Church Commissioners' research because Queen Anne's Bounty later held investments associated with the Company.

The history of the Company's activities must be examined alongside the precise dates and nature of Queen Anne's Bounty's holdings.

The Company's existence alone is not a complete account of the financial connection.

Status: Documented historical context.

B.7. 1713 — South Sea Company involvement in the asiento

Date: 1713
Classification: HD
Evidence ID: SPIRE-HIS-002

The Treaty of Utrecht arrangements included rights associated with the supply of enslaved African people to Spanish America.

The South Sea Company became involved in administering the British asiento concession.

This historical arrangement is relevant to the Company's commercial and financial activities.

The investigation should preserve the distinction between the Company's slave-trading operations, its government-debt activities and the securities held by investors.

The exact financial connection between a particular security and enslavement-related activity requires documentary examination.

Status: Established historical background.

B.8. 1720s–1770s — South Sea Company-related securities and Queen Anne's Bounty

Period: Eighteenth century; precise transactions vary
Classification: HD / FN
Evidence ID: SPIRE-HIS-003

The Commissioners' published research identified investments and income associated with South Sea Company securities.

The forensic accounting work examined historical financial records over an extended period.

This provides the principal financial connection underlying the modern institutional response.

However, the register must distinguish the dates of individual purchases, holdings, annuity income and sales.

The entire period should not be presented as one uninterrupted transaction.

Status: Published research supports the historical financial connection.

Outstanding evidence: Detailed transaction schedule and source-ledger references.

B.9. Eighteenth century — Benefactions potentially associated with slavery-derived wealth

Period: Multiple dates
Classification: HD / FN
Evidence ID: SPIRE-HIS-004

Queen Anne's Bounty received benefactions from a range of historical individuals.

The Commissioners' research examined whether some benefactions were associated with wealth connected to African chattel enslavement or the plantation economy.

Edward Colston is among the historical individuals discussed in the research.

However, each benefaction requires separate evidential treatment.

The existence of a person's connection with slavery-derived wealth does not automatically establish the provenance of every payment that person made.

Status: Historical research documented; individual transactions require precise attribution.

B.10. Eighteenth century — Accumulation of investment income

Period: Various years
Classification: HD / FN
Evidence ID: SPIRE-HIS-005

The Commissioners' research examined income received from relevant historical financial instruments.

Some later estimates express this income in present-day comparative monetary terms.

Those comparisons may assist in illustrating scale.

However, they must not be treated as contemporary assets or a precise calculation of current reparatory liability without further justification.

Status: Published historical financial analysis.

B.11. Nineteenth and early twentieth centuries — Institutional financial continuity

Period: 1800s–1947
Classification: HD
Evidence ID: SPIRE-HIS-006

Queen Anne's Bounty continued to exist as a Church-related financial institution.

The modern investigation considered the relationship between historical income and the later institutional endowment.

However, long periods of financial administration may make complete asset tracing difficult.

The investigation should distinguish institutional succession from a fully demonstrated chain connecting every historical asset to every modern holding.

Status: Institutional continuity documented; transaction-level tracing subject to evidential limitations.

B.12. 1948 — Formation of the modern Church Commissioners

Date: 1948
Classification: HD / ID
Evidence ID: SPIRE-HIS-006

Queen Anne's Bounty and the Ecclesiastical Commissioners were brought together to form the Church Commissioners for England.

This institutional development connects the historical predecessor fund to the modern body responsible for Project Spire.

It is central to the research's institutional framework.

However, legal succession should not be used as a substitute for specific evidence of financial continuity where that distinction matters.

Status: Documented.

PART III — MODERN RACIAL-JUSTICE CONTEXT, 2014–2021

B.13. 2014 — Church acknowledgement concerning Bishop Samuel Ajayi Crowther

Date: 2014
Classification: HD / PA
Evidence ID: SPIRE-PER-005

Archbishop Justin Welby spoke at a commemorative service concerning Bishop Samuel Ajayi Crowther.

The historical treatment of Crowther and the Church's recognition of racism became part of later archival reflection.

This event is relevant because a September 2026 article by Kwesi Ochosi examined Crowther and the work of repair.

However, the 2014 service should not be described as the launch of Project Spire.

Its relevance is historical and thematic.

Status: Documented historical context.

B.14. 2019 — Church Commissioners begin examining their endowment's origins

Date: 2019; precise commissioning date requires confirmation
Classification: RC / ID
Evidence ID: SPIRE-HIS-007

The Church Commissioners' Audit and Risk Committee raised questions about the origins of the institution's endowment.

This led to research concerning historical links with African chattel enslavement.

The Commissioners' official FAQ identifies 2019 as the beginning of the enquiry.

This is the starting point for the modern Project Spire research chronology.

Status: Officially documented.

Outstanding evidence: Original committee decision, commissioning terms and project-development records.

B.15. 2019–2021 — Initial historical and forensic research

Period: 2019–2021
Classification: RC
Evidence IDs: SPIRE-HIS-007; SPIRE-PER-001

The Church Commissioners commissioned professional research into historical financial records.

Grant Thornton provided forensic accounting expertise.

Academic historical input supported examination of the records.

These activities preceded the public announcement of the full findings.

However, the precise sequence of individual appointments, research stages and contract amendments requires further documentation.

Status: Research programme documented; complete contract chronology outstanding.

B.16. 2021 — Publication of From Lament to Action

Date: 2021
Classification: PA / GV
Evidence ID: SPIRE-SAF-001

The Archbishops' Anti-Racism Taskforce published recommendations concerning racial justice within the Church of England.

The publication established an important wider institutional framework.

However, it was not itself the Project Spire research report.

Its relevance concerns the wider Church's recognition of structural and institutional racial-justice issues.

Status: Documented.

B.17. 2021–2022 — Development of institutional racial-justice scrutiny

Period: 2021–2022
Classification: GV
Evidence ID: SPIRE-SAF-001

The Church developed arrangements for monitoring progress on racial-justice recommendations, including the Archbishops' Commission for Racial Justice.

This work provides an institutional context for RNL's later safeguards enquiries.

It should not automatically be treated as evidence that the Commission exercised direct operational control over Project Spire.

Status: Wider institutional framework documented.

PART IV — PUBLIC RESEARCH AND THE £100 MILLION COMMITMENT, 2022–2023

B.18. June 2022 — Initial publication of historical findings

Date: June 2022
Classification: PA / RC
Evidence ID: SPIRE-HIS-008

The Church Commissioners publicly acknowledged preliminary research identifying historical financial links to African chattel enslavement.

This represented a significant institutional development.

The findings placed the historical financial origins of the endowment into public discussion.

Status: Documented official announcement.

B.19. 10 January 2023 — Publication of the full report

Date: 10 January 2023
Classification: PA / RC
Evidence ID: SPIRE-HIS-009

The Commissioners published fuller findings concerning historical financial connections with African chattel enslavement.

The research addressed South Sea Company-related holdings and historical benefactions.

It provided the principal evidential foundation for the proposed reparatory response.

Status: Documented.

B.20. 10 January 2023 — Announcement of the £100 million commitment

Date: 10 January 2023
Classification: FN / PA
Evidence ID: SPIRE-FIN-001

The Commissioners announced a £100 million funding commitment.

The original programme envisaged investment, research and engagement over nine years beginning in 2023.

The announcement also contemplated the creation of an impact investment fund with the potential to support grants.

Status: Official commitment established.

Important limitation: No conclusion of completed financial transfer or beneficiary payment follows from the announcement.

B.21. January 2023 — Intention to establish an Oversight Group

Date: January 2023
Classification: GV / PA
Evidence ID: SPIRE-GOV-002

The Commissioners announced that an Oversight Group would be formed to advise on the proposed response.

The intention was to include significant participation from communities affected by the historical legacy.

Status: Documented institutional intention.

B.22. 10 May 2023 — Recruitment begins for the Oversight Group

Date: 10 May 2023
Classification: GV / PA
Evidence ID: SPIRE-GOV-002

The Church Commissioners announced recruitment for the independent Oversight Group.

The published description referred to advice on investment, grant-making, research and engagement.

The recruitment announcement provides evidence that the Group's creation proceeded through a formal public process.

However, an announcement of open recruitment does not independently establish every detail of applicant selection.

Status: Documented.

B.23. 24 July 2023 — Oversight Group membership announced

Date: 24 July 2023
Classification: GV / PA
Evidence ID: SPIRE-GOV-002

The Commissioners publicly announced the Oversight Group's membership.

The Group included financial, academic, social-justice and other relevant expertise.

This established the original advisory structure.

Status: Documented.

Important distinction: Appointment to the advisory Group did not automatically confer final authority over the Commissioners' endowment.

B.24. 2023 — Oversight Group research and consultation

Period: 2023
Classification: CN / RC
Evidence IDs: SPIRE-CON-001 through SPIRE-CON-004

The Oversight Group undertook research and consultation.

The activities were intended to inform its recommendations concerning the proposed reparatory response.

The record includes engagement in England, Jamaica, Barbados and Ghana.

Status: Documented consultation programme.

Outstanding evidence: Complete methodology, organisational participation and respondent-count reconciliation.

B.25. October 2023 — Facilitated engagement events

Date: October 2023
Classification: CN
Evidence ID: SPIRE-CON-002

The Oversight Group's published report describes five facilitated events in England, including engagement with younger stakeholders.

The Commissioners also report a global questionnaire.

The combined exercise was subsequently described as involving 1,106 participants.

Status: Published consultation record.

Qualification: The combined participation figure must not automatically be described as a statistically representative survey of the global African diaspora.

B.26. September 2023 — Racial Justice Commission references Project Spire

Date: 12 September 2023
Classification: PA / GV
Evidence ID: SPIRE-SAF-002

The Archbishops' Commission for Racial Justice publicly discussed Project Spire.

The Commission emphasised the importance of Africa, the Caribbean and their diaspora within the reparatory process.

This provides a documented connection between the wider Church racial-justice framework and Project Spire.

However, the statement does not establish that the Commission independently audited every Project Spire safeguarding procedure.

Status: Documented.

B.27. November 2023 — Board accepts Oversight Group report

Date: November 2023; precise Board meeting date requires confirmation
Classification: ID / GV
Evidence ID: SPIRE-GOV-003

The Church Commissioners' Board formally accepted the Oversight Group's report.

This preceded public publication of the recommendations in March 2024.

The event must be distinguished from the later public announcement.

Status: Documented in the Commissioners' implementation history.

Outstanding evidence: Board resolution and precise date.

PART V — OVERSIGHT GROUP RECOMMENDATIONS AND PROGRAMME DEVELOPMENT, 2024

B.28. February 2024 — Oversight Group report prepared for publication

Period: Early 2024
Classification: GV / RC
Evidence ID: SPIRE-GOV-003

The Oversight Group's report was finalised for publication.

The report contained recommendations concerning governance, financial scale, grant-making, impact investment and affected-community involvement.

Status: Published report available.

Qualification: Document production dates should be distinguished from Board acceptance and public release.

B.29. 4 March 2024 — Publication of Oversight Group recommendations

Date: 4 March 2024
Classification: PA / GV
Evidence ID: SPIRE-GOV-003

The Commissioners publicly welcomed the Oversight Group's recommendations.

The report called for a more ambitious reparatory response.

It recommended developing the fund towards £1 billion or more, accelerating implementation and strengthening Black community leadership.

Status: Documented.

B.30. March 2024 — The Fund for Healing, Repair and Justice becomes the public framework

Period: March 2024
Classification: GV / PA
Evidence ID: SPIRE-FIN-002

The proposed Fund for Healing, Repair and Justice was described as the vehicle through which the recommendations would inform a long-term programme.

The public framework included investment, grant-making and community involvement.

However, a public fund title is not proof that a separate registered charity already existed.

Status: Documented proposal.

B.31. 2024 — Further work on fund design and implementation

Period: 2024
Classification: GV / RC
Evidence IDs: SPIRE-GOV-004 through SPIRE-GOV-007

The Commissioners continued work on developing the proposed response.

Relevant subjects included governance, financial arrangements and the implementation of recommendations.

The precise dates of workstream creation and individual decisions require further verification.

Status: Programme-development period documented in later official accounts.

B.32. 31 December 2024 — Financial reporting cut-off

Date: 31 December 2024
Classification: FN
Evidence ID: SPIRE-FIN-007

This date forms the closing point of the period for which the Commissioners later reported approximately £1 million in Project Spire-related expenditure.

The amount excluded internal staff time.

The figure should not be treated as expenditure through 2025 or 2026.

Status: Official reporting period established.

PART VI — IMPLEMENTATION, FINANCIAL QUESTIONS AND REGULATORY DEVELOPMENT, 2025

B.33. 11 February 2025 — Final Racial Justice Commission report

Date: 11 February 2025
Classification: PA / GV
Evidence ID: SPIRE-SAF-001

The Church of England published the sixth and final report of the Archbishops' Commission for Racial Justice.

The report concluded that phase of institutional scrutiny.

Its publication is relevant to the wider context of safeguards against systemic racism.

However, it should not automatically be presented as certification of Project Spire's operational safeguards.

Status: Documented.

B.34. 26 March 2025 — From Commitment to Action update

Date: 26 March 2025
Classification: PA / GV
Evidence IDs: SPIRE-GOV-004 through SPIRE-GOV-007

The Commissioners published an implementation update.

It identified workstreams concerned with governance, impact investment, grant-making and theology.

It also described continuing research, engagement and communications activity.

This provides an important dated account of how the proposed programme was being developed.

Status: Documented.

B.35. April–May 2025 — Parliamentary examination of regulatory requirements

Period: April–May 2025
Classification: RG / PA
Evidence IDs: SPIRE-LEG-002 through SPIRE-LEG-004

Parliamentary questions addressed the legal authority required for the proposed reparatory arrangements.

The Commissioners referred to discussions with the Charity Commission and the possibility of a statutory ex gratia authorisation process.

These statements identified legal and regulatory steps still requiring completion.

Status: Dated parliamentary positions documented.

B.36. 6 May 2025 — Disclosure route for forensic accounting fees

Date: 6 May 2025
Classification: FN / PA
Evidence ID: SPIRE-PER-001

A parliamentary answer identified the Commissioners' annual accounts as a source of information concerning forensic accounting fees.

The investigation should use those accounts to extract the underlying amounts.

Status: Published parliamentary lead.

Outstanding evidence: Complete fee reconciliation.

B.37. June–July 2025 — Parliamentary dispute concerning expenditure

Period: June–July 2025
Classification: FN / PA
Evidence ID: SPIRE-FIN-008

Parliamentary questions raised an alleged £5 million expenditure figure.

The Commissioners rejected the amount.

The dispute concerned preparatory spending and must not be treated as evidence that £5 million had actually been spent.

Status: Public claim and official rebuttal documented.

B.38. July–September 2025 — Disputed future spending forecast

Period: July–September 2025
Classification: FN / PA
Evidence ID: SPIRE-FIN-009

A further question concerned an alleged £5 million forecast for 2026–28.

On 1 September 2025, the Commissioners stated that they did not recognise the figure.

This was a separate dispute from the earlier question concerning expenditure already incurred.

Status: Documented.

B.39. 30 August 2025 — Approximately £1 million expenditure reported

Date: 30 August 2025
Classification: FN / PA
Evidence ID: SPIRE-FIN-007

The Commissioners reported approximately £1 million in Project Spire-related expenditure from 2019 through December 2024.

The figure covered forensic accounting, risk management, consultation, events, communications, governance and ancillary costs.

Internal staff time was excluded.

Status: Official expenditure statement.

B.40. 1 September 2025 — £100 million retained in the general fund

Date: 1 September 2025
Classification: FN / RG / PA
Evidence ID: SPIRE-FIN-010

The Commissioners stated that the £100 million remained within their general fund pending regulatory authorisation.

They said the money would not be deployed before the necessary approval.

This is a critical financial milestone.

Status: Documented position at that date.

Important limitation: It must not automatically be treated as proof of the position on every subsequent date.

B.41. October–November 2025 — Further parliamentary scrutiny

Period: October–November 2025
Classification: RG / PA
Evidence IDs: SPIRE-LEG-004; SPIRE-LEG-006

Parliamentary questions continued to address trustee responsibilities, legal authority and the proposed new charity.

These records support the need to distinguish Board decisions from regulatory approval.

Status: Published.

B.42. 2025 — Further historical and academic research

Period: 2025; specific project dates require verification
Classification: RC
Evidence ID: SPIRE-PER-002

Later institutional statements described additional academic research and review.

This activity is relevant to the historical evidential record and the institution's response to criticism.

However, the precise contractual sequence and publication dates should be established separately.

Status: Officially described research activity; complete appointment chronology outstanding.

PART VII — PROJECT SPIRE, PROFESSIONAL ROLES AND PUBLIC CONTROVERSY, 2026

B.43. January 2026 — Commissioners respond publicly to parliamentary concerns

Period: January 2026
Classification: PA / RG
Evidence ID: SPIRE-COM-003

The Commissioners published a response to concerns raised by parliamentarians about Project Spire and the proposed fund.

The statement addressed aspects of the historical research, institutional responsibilities and proposed response.

This is relevant evidence of the Commissioners' public position.

Status: Official statement documented.

B.44. February 2026 — Diocese of Southwark truth-telling event

Period: February 2026
Classification: EV / PR
Evidence ID: SPIRE-PER-006

The Diocese of Southwark published a programme for a truth-telling gathering.

It identified Charmaine Simpson in a Church Commissioners research and engagement role.

This is significant evidence of a publicly documented professional association.

However, the programme does not establish the complete appointment contract or financial authority attached to the role.

Status: Published professional description.

Primary source:

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

B.45. 2026 — Lambeth Palace Library archival work continues to appear in public records

Period: 2026
Classification: PR / RC
Evidence IDs: SPIRE-PER-003 through SPIRE-PER-005

Public material describes Project Spire-related archival work at Lambeth Palace Library.

Dr Annabelle Gilmore and Kwesi Ochosi appear in relevant research and engagement accounts.

The precise employment and commissioning dates must be verified.

Status: Professional activity documented; complete contractual chronology outstanding.

B.46. 2026 — Church Commissioners' endowment valuation

Reporting date: 31 December 2025; published during 2026
Classification: FN
Evidence ID: SPIRE-FIN-005

The Commissioners reported an endowment value of approximately £11.6 billion at the end of 2025.

This information is relevant to debate about institutional financial capacity and the proportionality of the proposed commitment.

However, the endowment valuation is not the amount of unrestricted money available for immediate reparatory payment.

Status: Published institutional financial reporting.

B.47. April 2026 — Further statement concerning application preparation

Period: April 2026
Classification: RG / PA
Evidence ID: SPIRE-LEG-004

Parliamentary reporting addressed the preparation of applications concerning the proposed fund.

This is relevant to the regulatory chronology.

However, an application being prepared is not the same as an application having been submitted or approved.

Status: Previously identified dated institutional statement.

Outstanding evidence: Exact parliamentary reference, submission date and any subsequent decision.

B.48. 2 September 2026 — Kwesi Ochosi identified as Project Spire Coordinator: Archives

Date: 2 September 2026
Classification: PR / PA
Evidence ID: SPIRE-PER-005

The Lambeth Palace Library blog published an article by Kwesi Ochosi concerning Bishop Samuel Ajayi Crowther.

It identified him as Project Spire Coordinator: Archives.

This is one of the clearest publicly documented professional connections identified during the investigation.

It confirms a Project Spire archival role.

It does not establish governance or financial authority over the proposed £100 million fund.

Status: Directly documented in a primary institutional publication.

Primary source:

https://monumentoffame.org/

B.49. September–October 2026 — Continuing public and legal disagreement

Period: September–October 2026
Classification: CR / RG
Evidence ID: SPIRE-LEG-007

Project Spire remained the subject of public controversy concerning historical interpretation, proposed expenditure and charitable legal authority.

Critics questioned aspects of the programme.

The Commissioners defended their position.

The existence of criticism does not establish that the programme is unlawful.

The competing arguments should be preserved as part of the public record.

Status: Public controversy documented.

B.50. 13 October 2026 — Reporting concerning opposition and potential legal action

Date: 13 October 2026
Classification: CR / RG
Evidence ID: SPIRE-LEG-007

Contemporary reporting described organised opposition to the proposed £100 million fund and the pursuit of legal challenge.

This development is relevant because litigation or regulatory disagreement could affect implementation.

However, reported legal opposition must not be treated as a final judicial ruling.

Status: Secondary reporting of a challenge.

Outstanding evidence: Authoritative court or regulatory records confirming the precise procedural status.

B.51. October 2026 — Current fund establishment position

Date examined: 18 October 2026
Classification: RG / OS
Evidence IDs: SPIRE-LEG-003 through SPIRE-LEG-005

The Church Commissioners' public FAQ states that an application has not yet been made to register the proposed new charity or obtain regulatory consent to transfer the funds.

The related public enquiry page states that the proposed fund remains in implementation and is not operational.

These statements establish the official public position available to the investigation.

However, the precise timing of any future update must be tracked.

Status: Current public institutional statements examined for the report.

PART VIII — THE SEPARATE GLOBAL REPARATIONS HUB CHRONOLOGY

B.52. Development of the separate GRH initiative

Date: Exact organisational commencement date not established
Classification: UV / IQ
Evidence ID: SPIRE-GRH-001

The Global Reparations Hub emerged as a separate initiative associated with the UK Reparations Conference.

The complete organisational history, founding authority and governance structure belong to RNL's separate GRH investigation.

Project Spire's existence before the GRH launch does not establish that the Church Commissioners created the GRH.

Status: Separate initiative documented; precise founding chronology requires further evidence.

B.53. GRH launch publicity

Period: Before 17 October 2026
Classification: PA / EV
Evidence ID: SPIRE-GRH-001

Publicity announced a London launch for the Global Reparations Hub.

The launch was associated with the UK Reparations Conference.

Separate communications also involved arrangements concerning an event advertised at the Black Cultural Centre in Islington.

The exact sequence of those separate venue communications must be established through original dated advertisements and correspondence.

Status: Launch publicity documented; venue-related details remain in the separate enquiry.

B.54. Professional overlap becomes an investigative question

Period: Prior to and around 17 October 2026
Classification: IQ / PR
Evidence IDs: SPIRE-PER-005; SPIRE-PER-006; SPIRE-GRH-001

Published materials identified individuals associated with Project Spire-related research and engagement as participants in GRH-related activities.

These records gave RNL a legitimate basis for asking about possible institutional relationships.

However, the overlap alone did not establish common governance, funding or authorised representation.

Status: Overlapping professional involvement documented.

B.55. 17 October 2026 — UK Reparations Conference

Date: Saturday 17 October 2026
Classification: EV
Evidence ID: SPIRE-GRH-001

The UK Reparations Conference took place under the theme *From Resolution to Repair*.

The published agenda identified multiple sessions addressing reparatory justice.

The programme included participation by Charmaine Simpson and activities connected with the Global Reparations Hub.

The published agenda is primary evidence of the announced programme.

It should not automatically be treated as proof that every scheduled contribution occurred exactly as advertised.

Status: Conference programme documented.

Primary source:

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

B.56. 17 October 2026 — Global Reparations Hub launch

Date: 17 October 2026
Classification: EV / PA
Evidence ID: SPIRE-GRH-001

The conference programme included the Global Reparations Hub launch.

Relevant published records identify Kwesi Ochosi in a role associated with the launch.

The precise organisational responsibilities and financial arrangements remain matters for the separate GRH investigation.

The Church Commissioners' authority over the launch has not been established.

Status: Public launch programme documented; institutional relationships remain subject to verification.

B.57. Black Cultural Centre venue questions

Period: Before and around 17 October 2026
Classification: IQ / UV
Evidence ID: SPIRE-GRH-003

Questions arose concerning a separately advertised event associated with the Black Cultural Centre in Islington.

These questions included booking authority, changes in arrangements and public communications.

The details belong to the separate Black Cultural Centre investigation.

They should not automatically be attributed to Project Spire.

Status: Separate enquiry requiring its own original-document chronology.

B.58. 18 October 2026 — Community concerns and requests for clarification

Date: Sunday 18 October 2026
Classification: IQ
Evidence ID: SPIRE-GRH-003

Correspondence and discussion concerning the GRH launch raised questions about communications, organisational authority and consultation with longstanding grassroots reparations groups.

Empress Judah's concerns formed part of the wider investigative context.

However, her concerns about GRH arrangements must not be treated as proof of deficiencies within Project Spire's separate 2023 consultation.

The investigations require distinct evidence.

Status: Attributed community concerns and investigative questions.

B.59. 18 October 2026 — RNL examines the Project Spire connection

Date: 18 October 2026
Classification: IQ / RC
Evidence IDs: SPIRE-GRH-001; SPIRE-GRH-002

RNL examined the possible relationship between Project Spire, named professional participants and the GRH launch.

The documentary research identified Church Commissioners material, parliamentary answers, programme documents and archival evidence.

This resulted in an expanded investigation concerning Project Spire itself.

Status: RNL investigative activity.

B.60. 18 October 2026 — Documentary overlap differentiated from organisational control

Date: 18 October 2026
Classification: IQ
Evidence ID: SPIRE-GRH-002

The investigation distinguished documented overlapping professional activities from unverified institutional relationships.

The existence of relevant professional roles was supported by published material.

However, common governance, funding and control were not established.

This distinction became a governing principle of the report.

Status: Preliminary evidential assessment.

PART IX — THE RNL INVESTIGATION CHRONOLOGY

B.61. 18 October 2026 — Initial Project Spire research reconstructed

RNL brought together material concerning the Church Commissioners' historical research, the original £100 million commitment, the Oversight Group, financial reporting and the proposed fund.

This expanded the initial enquiry beyond named individuals.

The investigation began examining historical responsibility and institutional delivery.

Status: Investigative research.

B.62. 18 October 2026 — Legal and financial enquiry developed

RNL examined parliamentary answers concerning legal authorisation, charity registration, financial expenditure and the general-fund treatment of the £100 million commitment.

The investigation distinguished formal authorisation from financial transfer.

It also identified the difference between preparatory expenditure and reparatory benefits received.

Status: Investigative analysis.

B.63. 18 October 2026 — Governance and consultation questions consolidated

RNL examined the Oversight Group's recommendations, consultation information and the intended governance of the proposed fund.

The investigation distinguished advisory roles, community representation and legal authority.

It also identified the need for further evidence concerning grassroots participation.

Status: Investigative analysis.

B.64. 18 October 2026 — Safeguards enquiry developed

RNL examined the wider Church of England racial-justice framework and the need for Project Spire-specific safeguards.

The enquiry focused upon the possibility of anti-Black racism, racial bias and Institutional Racism in decision-making processes.

No finding of discriminatory wrongdoing was made.

Status: Preventative safeguards enquiry.

B.65. 18 October 2026 — Financial and professional-role evidence consolidated

RNL incorporated the reported expenditure through December 2024 and examined relevant professional appointments.

The investigation recorded the direct published confirmation of Kwesi Ochosi's Project Spire archival coordination role.

It also examined Charmaine Simpson's research and engagement position.

No conclusion of improper financial authority or conflict was made.

Status: Documentary consolidation.

B.66. 18 October 2026 — Sections 1–24 completed as drafts

RNL completed the initial 24-section documentary investigation.

The report set out established findings, outstanding questions, evidential limitations and recommendations for further institutional enquiries.

The completion of the text did not constitute a final determination of wrongdoing.

Status: Initial documentary drafting completed.

B.67. 18 October 2026 — Back matter and final signature arrangements established

RNL identified six supporting appendices and a single final signature and authorisation page.

The appendices were intended to support the permanent evidential and operational record.

Status: Report architecture established.

B.68. 18 October 2026 — Appendix A prepared

Appendix A consolidated the principal evidence categories, source references and outstanding requirements.

It established a master evidence-identification system.

Status: Draft completed.

B.69. 18 October 2026 — Appendix B prepared

This appendix establishes the chronological structure of the investigation.

It separates historical events, Project Spire institutional decisions, professional roles, legal processes, the GRH launch and RNL's own investigative activity.

Status: Draft completed.

PART X — CONSOLIDATED CHRONOLOGY TABLE

B.70. Historical period

Date or period	Event	Evidence status
1704	Queen Anne's Bounty established	Documented
1711	South Sea Company established	Documented
1713	South Sea Company involved in asiento arrangements	Historical context documented

Eighteenth century	Queen Anne's Bounty holds relevant securities and receives income	Published forensic research
Eighteenth century	Relevant benefactions received	Individual records require precise attribution
1800s–1947	Institutional financial continuity	Documented institutionally; detailed asset tracing limited
1948	Formation of Church Commissioners	Documented

B.71. Modern Project Spire period

Date or period	Event	Evidence status
2019	Audit and Risk Committee raises endowment-origins question	Official statement
2019–21	Historical and forensic research	Documented programme
2021	*From Lament to Action*	Published
June 2022	Interim historical findings announced	Published
10 Jan 2023	Full report and £100m commitment announced	Published
10 May 2023	Oversight Group recruitment announced	Published
24 Jul 2023	Oversight Group membership announced	Published
Sep 2023	Racial Justice Commission references Project Spire	Published
Oct 2023	Consultation events and survey	Published
Nov 2023	Board accepts Oversight Group report	Official retrospective account
4 Mar 2024	Recommendations published	Published
2024	Further programme design	Continuing activity

31 Dec 2024	Cut-off for later £1m expenditure statement	Official reporting period
11 Feb 2025	Final Racial Justice Commission report	Published
26 Mar 2025	Implementation workstreams update	Published
Apr–May 2025	Regulatory questions and discussions disclosed	Parliamentary record
Jun–Sep 2025	Disputed £5m figures examined	Parliamentary record
30 Aug 2025	Approximately £1m expenditure disclosed	Parliamentary record
1 Sep 2025	£100m stated to remain in general fund	Dated parliamentary statement
Oct–Nov 2025	Further legal scrutiny	Parliamentary record
Jan 2026	Commissioners respond to parliamentary criticism	Published
Feb 2026	Southwark truth-telling programme identifies Charmaine Simpson's role	Published
2 Sep 2026	Kwesi Ochosi Project Spire archives role explicitly published	Primary institutional publication
13 Oct 2026	Legal opposition reported	Secondary reporting
18 Oct 2026	Fund still described as not operational	Official public-page position

B.72. Separate GRH and investigation period

Date or period	Event	Evidence status
Before 17 Oct 2026	GRH launch publicity	Published event materials

Before 17 Oct 2026	Black Cultural Centre venue arrangements questioned	Separate enquiry
17 Oct 2026	UK Reparations Conference	Published programme
17 Oct 2026	GRH launch listed within conference	Published programme
18 Oct 2026	Further concerns and correspondence	Attributed accounts
18 Oct 2026	RNL investigates documented professional overlap	Investigation record
18 Oct 2026	Project Spire Sections 1–24 drafted	Completed drafting
18 Oct 2026	Appendix A drafted	Completed drafting
18 Oct 2026	Appendix B drafted	Completed drafting

PART XI — UNRESOLVED CHRONOLOGICAL QUESTIONS

B.73. Exact research commissioning dates

The precise date of the original forensic accounting commission has not been established through the records consolidated here.

The Commissioners should identify the authorising decision and contract commencement date.

The investigation should also determine whether the research programme underwent material changes before the 2022 interim announcement.

B.74. Exact Oversight Group decision dates

The Commissioners state that the Board accepted the Oversight Group's report in November 2023.

The exact meeting and resolution date should be obtained.

The record should distinguish formal acceptance from the public release in March 2024.

B.75. Workstream establishment dates

The implementation workstreams were described publicly in March 2025.

Their precise dates of creation and internal authorisation require confirmation.

A public report date is not necessarily the date an activity began.

B.76. Professional appointment commencement dates

The precise start and end dates of relevant archival, research and engagement appointments remain to be verified.

This includes the roles of Dr Annabelle Gilmore, Kwesi Ochosi and Charmaine Simpson.

The investigation should not infer employment dates from event dates or publication dates.

B.77. Regulatory application dates

The exact dates of any charity registration application or section 106 application are material.

The current public FAQ states that such applications have not yet been made.

Any later change should be documented by the appropriate authoritative record.

B.78. Financial transaction dates

The dates of actual transfers, investments, grants and beneficiary receipts remain central to the money trail.

Where no transactions have occurred, the responsible institution should confirm that position.

A financial commitment date must not be used as a substitute for transaction evidence.

B.79. GRH establishment date

The complete founding chronology of the Global Reparations Hub remains part of the separate GRH investigation.

The date of the public launch should not automatically be treated as the date the organisation was legally established.

B.80. Black Cultural Centre venue chronology

The precise chronology of advertised venue arrangements, booking discussions, communications and cancellation requires original records.

Those matters should remain in the separate investigation.

No Project Spire responsibility should be inferred without specific evidence.

B.81. Chronology of conflict-of-interest declarations

If any formal declarations concerning overlapping professional activities existed, the investigation should determine when they were made and which decisions they concerned.

The mere existence of overlapping roles is not proof that a declaration was required or omitted.

The relevant policy and decision must first be identified.

B.82. Chronology of institutional safeguards

The investigation should establish when applicable Project Spire-specific anti-racism and Institutional Racism safeguards were adopted.

It should also determine whether they were reviewed or changed.

The dates matter because a policy introduced after a particular decision cannot automatically establish protection of the earlier decision.

PART XII — CHRONOLOGICAL EVIDENCE HANDLING

B.83. Event date versus publication date

Every entry should distinguish the date an event occurred from the date on which it was announced or reported.

For example, the Oversight Group report was accepted in November 2023 and published in March 2024.

Treating those dates as interchangeable would distort the institutional sequence.

B.84. Announcement date versus implementation date

The £100 million commitment was announced in January 2023.

That date is not proof of completed regulatory approval or financial transfer.

The chronology must preserve the distinction between commitment and delivery.

B.85. Appointment date versus appearance date

A person may appear in a public event after beginning a professional appointment.

A biography published in September 2026 does not prove that the associated employment commenced in September.

The appointment's actual dates require independent records.

B.86. Reported concern versus established event

A community participant may report a concern about a particular event.

That report should be dated and attributed.

It should not automatically be entered as an established account of another person's conduct or intentions.

B.87. Changes in institutional position

Where the Commissioners publish an updated regulatory, financial or governance position, the new statement should be added to the chronology.

The earlier statement should remain available.

This permits the development of the programme to be reconstructed accurately.

B.88. Avoiding causal assumptions

The sequence of events does not itself establish causation.

Project Spire existed before the GRH launch.

Certain individuals participated in both settings.

However, those facts do not prove that Project Spire created, financed or controlled the GRH.

A causal claim requires additional supporting evidence.

B.89. Preservation of uncertainty

Where only the month or year is known, the chronology should use that level of precision.

It should not invent a day.

Where an approximate period is known, it should be described as approximate.

The quality of the chronology depends upon accuracy rather than artificial completeness.

B.90. Continuing updates

The chronology should remain open to future developments.

Updates may concern regulatory approval, fund registration, financial transfers, governance appointments, litigation and verified reparatory outcomes.

Each new entry should include its source and evidential status.

PART XIII — MASTER CHRONOLOGY SOURCE REGISTER

B.91. Core primary sources

B-SRC-001 — Church Commissioners' historical FAQ

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

B-SRC-002 — January 2023 research and funding announcement

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

B-SRC-003 — May 2023 Oversight Group recruitment

https://www.churchofengland.org/media/press-releases/church-commissioners-starts-recruitment-oversight-group-new-impact-investment

B-SRC-004 — July 2023 Oversight Group appointments

https://www.churchofengland.org/media/press-releases/church-commissioners-announce-members-oversight-group-advise-response-historic

B-SRC-005 — March 2024 Oversight Group recommendations

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

B-SRC-006 — March 2025 implementation update

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

B.92. Financial, professional and contemporary sources

B-SRC-007 — Project Spire expenditure answer

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

B-SRC-008 — Financial commitment and regulatory statement

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

B-SRC-009 — Church Commissioners' current operational statement

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

B-SRC-010 — Lambeth Palace Library blog

https://monumentoffame.org/

B-SRC-011 — Diocese of Southwark programme

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

B-SRC-012 — UK Reparations Conference 2026 programme

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

B-SRC-013 — Contemporary October 2026 reporting

https://www.theguardian.com/world/2026/oct/13/church-of-england-slavery-compensation-fund

The original documents should remain within the permanent evidence archive.

A current webpage should not silently replace the historical version previously examined.

PART XIV — CHRONOLOGICAL FINDINGS

B.93. The historical financial enquiry predates the modern reparations controversy

The Commissioners' research began in 2019.

The full findings and £100 million commitment were announced in January 2023.

The later public disagreements and GRH launch occurred after those institutional developments.

This chronology establishes that Project Spire had an independent institutional history before the October 2026 events.

B.94. The advisory process followed the original commitment

The Commissioners announced the commitment in January 2023.

Recruitment for the Oversight Group followed.

The Group was appointed in July 2023.

Its recommendations were accepted in November 2023 and published in March 2024.

This sequence is relevant because the Oversight Group was advising on how to develop the existing response.

It did not originate the original £100 million announcement.

B.95. Legal implementation lagged behind public commitment

The £100 million commitment was announced in January 2023.

The programme subsequently underwent consultation, governance development and legal preparation.

Official information examined in October 2026 still described the proposed fund as not operational.

This establishes a substantial interval between announcement and operation.

However, the reasons for that interval require examination of the actual regulatory and institutional chronology.

B.96. Financial expenditure preceded reparatory delivery

The Commissioners reported preparatory expenditure from 2019 through December 2024.

This spending involved research and programme development.

However, the reported costs should not be counted as reparatory grants or compensation.

The chronology therefore distinguishes expenditure on preparing the response from subsequent financial delivery.

B.97. The documented professional overlap is later than Project Spire's origins

The public record identifies relevant professional roles and GRH-related activities in 2026.

Project Spire's institutional development began years earlier.

The later overlap is a legitimate subject for governance clarification.

However, chronology alone does not establish that the GRH was financed or controlled by Project Spire.

B.98. The investigation has not established improper conduct

The chronology identifies historical events, official decisions, professional activities and public disagreements.

It does not establish wrongdoing by named individuals.

It does not establish a common Project Spire–GRH financial structure.

It does not establish that the full £100 million has been delivered.

These conclusions must remain limited to the evidence.

PART XV — APPENDIX B FORMAL CONCLUSION

B.99. Chronological assessment

The evidence establishes a continuous sequence beginning with the eighteenth-century financial history of Queen Anne's Bounty, continuing through the establishment of the modern Church Commissioners and culminating in the institution's twenty-first-century research and proposed reparatory response.

The modern research began in 2019.

The findings were publicly acknowledged in 2022.

The full report and £100 million commitment followed in January 2023.

The independent Oversight Group was recruited and appointed in 2023.

Its recommendations were accepted in November 2023 and published in March 2024.

Implementation work continued through 2025 and 2026.

The programme remained subject to unresolved legal, financial and governance processes at the date of this investigation.

The professional overlap with the Global Reparations Hub was documented in the context of later activities and the October 2026 launch.

That overlap does not establish common institutional control.

The chronology therefore supports continued documentary enquiry rather than predetermined allegations.

B.100. Conclusion of Appendix B

The master chronology provides the temporal foundation for the Project Spire investigation.

It establishes the order of major historical and institutional developments.

It preserves the distinction between public announcements, advisory recommendations, internal decisions, regulatory processes and actual financial transactions.

It also separates Project Spire from the Global Reparations Hub and the Black Cultural Centre enquiries.

The central conclusion of Appendix B is that the chronological evidence establishes Project Spire as a Church Commissioners initiative with a documented institutional history preceding the October 2026 GRH launch, while the precise

contractual, governance and financial implications of later professional overlap remain matters for further verification.

Future developments must be added through dated, source-supported entries.

The chronology should not be altered to produce a preferred conclusion.

Its purpose is to preserve what happened, when it happened and what the available evidence can responsibly establish.

APPENDIX B — STATUS CERTIFICATION

Appendix: B of F
Title: Master Chronology
Prepared: 18 October 2026
Document status: Completed as a consolidated draft
Historical coverage: 1704–18 October 2026
Institutional and professional chronology: Partly verified; outstanding dates expressly identified
Regulatory and financial updates: Further verification required
Project Spire–GRH institutional relationship: Not established
Findings of wrongdoing: None made

Prepared for and on behalf of Reparation Nation Limited

Derrick Emmanuel Lynch
Also known as John Canoe
Company Number: 14761041

The formal signature and authorisation page will appear once, after Appendix F.

END OF APPENDIX B OF F — MASTER CHRONOLOGY

NEXT: APPENDIX C OF F — INSTITUTIONS, ORGANISATIONS AND PERSONS REGISTER: LEGAL IDENTITIES, DOCUMENTED ROLES, APPOINTMENT AUTHORITY, PROFESSIONAL AFFILIATIONS, INSTITUTIONAL BOUNDARIES AND OUTSTANDING VERIFICATION.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

APPENDIX C OF F

INSTITUTIONS, ORGANISATIONS AND PERSONS REGISTER: LEGAL IDENTITIES, DOCUMENTED ROLES, APPOINTMENT AUTHORITY, PROFESSIONAL AFFILIATIONS, INSTITUTIONAL BOUNDARIES AND OUTSTANDING VERIFICATION

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Document status: Consolidated institutional and personnel register accompanying Sections 1–24 and Appendices A–B. Documented identities and roles are distinguished from unverified employment arrangements, governance powers, contractual relationships, financial control and institutional representation.

PART I — PURPOSE, SCOPE AND INVESTIGATIVE PRINCIPLES

C.1. Purpose of this appendix

This appendix establishes a consolidated register of the institutions, organisations and individuals relevant to Reparation Nation Limited's independent investigation into Project Spire.

The investigation began with questions about the apparent involvement of individuals associated with Church-related reparations activities in the Global Reparations Hub launch of 17 October 2026.

Subsequent documentary research identified a wider network of historical institutions, governing bodies, researchers, professional advisers, community organisations, regulators and public participants.

The existence of these connections requires careful classification.

A person may be employed by one institution while participating independently in another organisation.

An individual may possess an advisory appointment without holding legal authority over financial decisions.

A professional may undertake commissioned research without controlling the research sponsor's wider programme.

An organisation may appear alongside another at a conference without sharing management or funding.

The register therefore seeks to establish **who each person or organisation is, what the documentary evidence confirms, what authority is attached to the role, and what remains unverified**.

Its purpose is accurate institutional mapping, not the creation of unsupported associations.

C.2. The distinction between identification and authority

Identifying a person does not establish the extent of that person's powers.

A published job title may establish an appointment.

It may not establish the employment contract, reporting structure, procurement authority or access to financial resources.

Similarly, identifying an organisation does not establish that the organisation is incorporated, registered as a charity or authorised to receive money.

Those matters must be verified through appropriate records.

The register therefore separates identity, affiliation, professional activity, governance, financial authority and representation.

C.3. The distinction between professional involvement and institutional responsibility

Professional involvement may occur in several capacities.

A researcher may contribute under an employment agreement.

A consultant may provide services through a commercial contract.

An adviser may participate in an unpaid professional capacity.

A speaker may contribute personally to a conference.

A community representative may participate under a mandate from an organisation.

A trustee may exercise legal duties in relation to a charity.

These categories are not interchangeable.

The investigation should not infer a trustee appointment from an advisory role or a financial relationship from a speaking engagement.

C.4. The distinction between association and conflict of interest

An individual may hold several legitimate professional or organisational roles.

Such arrangements may provide relevant expertise.

However, an overlap may require consideration under applicable conflict-of-interest rules if it relates to a particular decision.

The existence of multiple roles does not automatically establish an improper conflict.

A responsible assessment requires identification of the duty, interest, decision and relevant safeguards.

The register therefore records affiliations without treating their existence as allegations of wrongdoing.

C.5. The distinction between identity and representation

A person's racial, ethnic or cultural identity does not automatically give them authority to represent every community sharing that identity.

Similarly, an organisation described as Black-led does not necessarily possess an elected or formally delegated mandate from all Black/Afrikan communities.

The investigation should examine how representatives are appointed and to whom they are accountable.

Consultation is not automatically representation.

Representation is not automatically governance.

Governance is not automatically ownership.

These distinctions are particularly important for a reparatory fund intended to be Black-led and community-owned.

C.6. RNL's formal investigative position

RNL states:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

The register seeks evidence of safeguards, institutional duties and actual decision-making arrangements.

Its inclusion of an individual or organisation does not imply suspicion, wrongdoing, unlawful conduct or improper influence.

The investigation remains open to corrections and authoritative institutional explanations.

PART II — REGISTER STRUCTURE AND CLASSIFICATION

C.7. Master identification codes

Code	Category
C-HIS	Historical institution
C-INS	Contemporary institution
C-REG	Regulator or oversight authority
C-GOV	Governing or advisory body
C-RES	Research or archival institution
C-PRO	Professional services organisation
C-REP	Reparations or community organisation
C-EVT	Conference or event-organising body
C-PER	Individual person
C-RNL	Reparation Nation Limited
C-EXT	External relationship requiring confirmation

These identifiers are intended to assist the permanent evidence register.

They do not confer any formal status upon the people or organisations listed.

C.8. Evidential status codes

Status	Meaning
Confirmed institutional identity	Existence established through reliable institutional records
Documented historical role	Historical function supported by published records
Documented professional role	Appointment or professional capacity identified in a reliable publication
Documented event participation	Named in a programme or other reliable event record

Official institutional position	Statement made by the relevant institution
Proposed structure	Intended arrangement not established as fully operational
Partially verified	Some aspects documented; material details outstanding
Unverified	Insufficient evidence presently available
Not established	No adequate evidence supporting the particular relationship or conclusion
Requires current verification	Historical record exists, but contemporary status may have changed

C.9. Required information for each entry

Each completed register entry should identify the legal or public name of the institution or individual.

It should record the relevant role, institutional affiliation, date or period, principal supporting source and relationship to Project Spire.

Where applicable, it should identify the authority associated with the role.

It should also distinguish any confirmed financial relationship from a relationship that has merely been queried.

Where the relevant information is unavailable, the register should record that limitation.

No employment contract, payment, trustee appointment or financial authority should be invented to complete a field.

PART III — HISTORICAL INSTITUTIONS

C.10. Queen Anne's Bounty

Register ID: C-HIS-001
Institution: Queen Anne's Bounty
Historical establishment: 1704
Institutional status: Historical predecessor institution
Relationship to Project Spire: Principal subject of the Church Commissioners' financial investigation

Queen Anne's Bounty was established to augment the incomes of poorer Anglican clergy.

Its investments and benefactions became central to the modern investigation into historical connections with African chattel enslavement.

The institution should not be treated as an independent organisation still operating in 2026.

Its historical functions are relevant through the succession arrangements that created the modern Church Commissioners.

Evidence status: Documented.

Outstanding requirement: Preserve historical statutory records and distinguish institutional succession from transaction-level tracing of particular assets.

C.11. South Sea Company

Register ID: C-HIS-002
Institution: South Sea Company
Historical establishment: 1711
Institutional status: Historical commercial and financial company
Relationship to Project Spire: Subject of historical research concerning securities and slavery-related commercial activities

The South Sea Company was involved in financial arrangements and commercial activities including the trafficking of enslaved Africans.

Queen Anne's Bounty held investments associated with the Company.

The register should distinguish the Company's activities, its financial securities and the investment decisions of Queen Anne's Bounty.

The South Sea Company should not be described as a contemporary Project Spire participant.

Evidence status: Documented historical relevance.

C.12. Ecclesiastical Commissioners

Register ID: C-HIS-003
Institution: Ecclesiastical Commissioners
Institutional status: Historical Church-related body
Relationship to Project Spire: Predecessor institution within the 1948 creation of the modern Church Commissioners

The Ecclesiastical Commissioners were brought together with Queen Anne's Bounty to form the modern Church Commissioners.

This institutional development is relevant to understanding the legal and financial continuity of the modern body.

The register should preserve the distinction between the historical responsibilities of the two predecessor organisations.

Evidence status: Documented.

C.13. Historical benefactors and named individuals

Register ID: C-HIS-004
Category: Historical individuals connected with benefactions examined in the research

The Church Commissioners' research examined benefactions from individuals whose wealth may have been associated with African chattel enslavement.

Edward Colston appears among the historical figures discussed.

However, each historical individual must be assessed through the relevant records.

A historical association should not be treated as proof of the precise source of every benefaction.

The investigation should preserve the amounts, dates and evidence relevant to each transaction.

Evidence status: Historical research documented; transaction-level interpretation requires individual examination.

PART IV — PRINCIPAL CONTEMPORARY INSTITUTIONS

C.14. Church Commissioners for England

Register ID: C-INS-001
Institution: Church Commissioners for England
Type: Church of England charitable institution and endowment administrator
Relationship to Project Spire: Principal responsible institution

The Church Commissioners commissioned historical research into the origins of their endowment and announced the £100 million reparatory commitment.

Their Board considered the historical findings and Oversight Group recommendations.

The Commissioners have also been responsible for developing the proposed Fund for Healing, Repair and Justice.

They are therefore the principal institutional respondent concerning Project Spire's financial commitment, programme development, governance and implementation.

However, the Commissioners should not automatically be treated as legally identical to every other Church of England institution.

Evidence status: Confirmed.

Official information:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england

C.15. Church of England

Register ID: C-INS-002
Institution: Church of England
Type: Established Church in England
Relationship to Project Spire: Wider ecclesiastical and institutional setting

Project Spire developed within the wider Church of England.

However, the Church includes distinct bodies with different responsibilities.

The Church Commissioners, General Synod, dioceses, bishops, parishes and Church-related institutions should not automatically be treated as one legal decision-maker.

The investigation must identify which institution took a particular decision.

An event organised by a diocese does not necessarily establish that the Church Commissioners controlled it.

Similarly, the appearance of a bishop does not automatically establish that the bishop exercised financial authority over Project Spire.

Evidence status: Confirmed wider institutional relationship.

C.16. Church Commissioners' Board of Governors

Register ID: C-GOV-001
Body: Board of Governors
Relationship to Project Spire: Principal institutional governing body

The Board approved the original institutional response and accepted the Oversight Group's report.

It is central to questions concerning the £100 million commitment and legal authority.

However, the precise division of responsibilities between the Board, its committees and authorised officers should be confirmed through current governance records.

Evidence status: Documented governing responsibility.

Outstanding requirement: Complete Board resolutions, delegation schedule and approval limits.

C.17. Church Commissioners' Audit and Risk Committee

Register ID: C-GOV-002
Body: Audit and Risk Committee
Relationship to Project Spire: Associated with the original enquiry into the endowment's historical origins

The Commissioners' public account identifies the Committee's questioning of the endowment's origins in 2019.

This led to historical research.

The Committee's initial role should not automatically be treated as continuing financial control over the proposed fund.

Evidence status: Documented original involvement.

Outstanding requirement: Original committee records and subsequent formal responsibilities.

C.18. The Board subgroup concerned with Project Spire

Register ID: C-GOV-003
Body: Church Commissioners Board subgroup concerned with the historical response

The Commissioners' July 2023 announcement identified the Right Reverend David Urquhart as chair of the Board subgroup focused upon this work.

This establishes an identifiable governance role during the original Oversight Group appointment process.

However, the complete subgroup membership, terms of reference and continuing status require verification.

The historical role should not automatically be treated as unchanged in October 2026.

Evidence status: Documented historical institutional role.

C.19. The independent Project Spire Oversight Group

Register ID: C-GOV-004
Body: Independent Oversight Group
Established: 2023
Relationship to Project Spire: Advisory body established to develop recommendations

The Group was appointed to advise the Church Commissioners on their response to historical financial connections with African chattel enslavement.

It undertook research and consultation and recommended arrangements concerning fund scale, governance, investment and grants.

Its original advisory function is documented.

However, the term *Oversight Group* does not automatically establish that it possessed powers equivalent to a trustee board.

The investigation should distinguish advisory influence from final legal authority.

Evidence status: Documented.

Primary source:

https://www.churchofengland.org/media/press-releases/church-commissioners-announce-members-oversight-group-advise-response-historic

C.20. Oversight Group leadership

Register ID: C-GOV-005

The Right Reverend Dr Rosemarie Mallett, Bishop of Croydon, was appointed Chair.

Geetha Tharmaratnam, identified at the time as Chief Impact Investment Officer of the WHO Foundation, was appointed Vice-Chair.

These appointments are documented in the July 2023 announcement.

Their original roles should be recorded accurately.

However, the investigation should obtain confirmation of their current responsibilities before attributing any continuing powers.

Evidence status: Documented historical appointments.

C.21. Oversight Group membership and expertise

Register ID: C-GOV-006

The July 2023 announcement identified members with expertise in impact investment, community development, academic research and other relevant fields.

Among the publicly named members were Roy Swan, Tara Sabre Collier and Derek Bardowell.

Their participation should be understood through the published appointment announcement and the Group's terms of reference.

The register should not attribute employment by the Church Commissioners merely because someone served on the Group.

Nor should it assume individual authority to allocate funds.

Evidence status: Published membership information.

Outstanding requirement: Preserve the complete original membership list, later changes and relevant appointment terms.

C.22. Proposed Fund for Healing, Repair and Justice

Register ID: C-INS-003
Institutional status: Proposed separate charitable entity
Relationship to Project Spire: Intended principal vehicle for reparatory investment and grants

The fund was developed as the proposed mechanism for the Commissioners' reparatory financial response.

The original intention was to support affected communities through a long-term programme.

However, the official information examined describes the fund as not yet operational.

The register must therefore distinguish the proposed fund from a legally registered, fully operational organisation.

Evidence status: Proposed entity documented.

Outstanding requirement: Current charity registration, governing document, trustees, powers and financial accounts.

C.23. Project Spire Governance Workstream

Register ID: C-GOV-007

The Commissioners' March 2025 implementation update identifies a Governance Workstream.

Its function included developing arrangements for a proposed charitable entity.

However, the workstream's membership and formal delegated powers require verification.

A workstream is not automatically a separate legal institution.

Evidence status: Documented programme structure.

C.24. Impact Investment Workstream

Register ID: C-GOV-008

The Impact Investment Workstream examined financial arrangements intended to support long-term reparatory outcomes.

The existence of the workstream is documented.

However, it does not establish that investments have already been executed or that workstream participants possess final authority over investment capital.

Evidence status: Documented preparatory activity.

C.25. Grant-Making Workstream

Register ID: C-GOV-009

The Grant-Making Workstream developed proposals for funding grassroots initiatives.

Its existence is documented.

However, the final eligibility criteria, decision-making powers and completed grant awards require separate verification.

Evidence status: Documented preparatory activity.

C.26. Theology Workstream

Register ID: C-GOV-010

The Theology Workstream examined the ethical and religious dimensions of repentance, reconciliation and repair.

Its responsibilities should remain distinguished from legal and financial authority.

A theological recommendation does not itself authorise a transfer of charitable assets.

Evidence status: Documented preparatory activity.

PART V — REGULATORY AND PUBLIC ACCOUNTABILITY INSTITUTIONS

C.27. Charity Commission for England and Wales

Register ID: C-REG-001
Institution: Charity Commission for England and Wales
Type: Statutory charity regulator
Relationship to Project Spire: Relevant to proposed charity registration and statutory authorisation

The Commissioners have referred to discussions with the Charity Commission concerning the legal arrangements for the proposed fund.

The regulator's role must be distinguished from the Church Commissioners' own decision-making.

The Charity Commission does not automatically become responsible for the historical research, community consultation or every professional appointment.

Its authority concerns matters within its statutory jurisdiction.

Evidence status: Relevant regulatory institution established.

Official register:

https://register-of-charities.charitycommission.gov.uk/

C.28. UK Parliament

Register ID: C-REG-002
Institution: UK Parliament
Relationship to Project Spire: Parliamentary scrutiny and public accountability

Parliamentary questions have produced important written statements about Project Spire.

These include expenditure, the proposed legal route, the £100 million commitment and the Commissioners' charitable responsibilities.

The parliamentary record is important evidence of what was asked and answered.

However, a parliamentary question is not proof that its factual premise is accurate.

The investigation must distinguish the question from the official response.

Evidence status: Documented scrutiny.

C.29. The Second Church Estates Commissioner

Register ID: C-REG-003
Role: Parliamentary representative answering questions concerning the Church Commissioners

The Second Church Estates Commissioner has answered parliamentary questions concerning Project Spire.

These answers are relevant as statements supplied through an official parliamentary process.

However, the role should not be confused with the Charity Commission's regulatory powers or with the authority of the Commissioners' Board.

The investigation should identify the office-holder and reporting period applicable to each answer.

Evidence status: Documented parliamentary function.

C.30. Courts and legal proceedings

Register ID: C-REG-004
Category: Relevant courts or tribunals, if proceedings arise

Contemporary reporting in October 2026 described legal opposition to the proposed fund.

However, a reported challenge does not automatically establish that formal proceedings have been issued or that a final judgment exists.

The investigation should obtain authoritative court records before assigning a case number, party status or judicial outcome.

Evidence status: Reported legal challenge; formal procedural details require verification.

C.31. General Synod

Register ID: C-INS-004
Institution: General Synod of the Church of England

General Synod provides a forum for governance, debate and scrutiny within the Church of England.

Project Spire-related material has appeared in relevant Church publications.

However, General Synod should not automatically be treated as the legal decision-maker authorising individual Church Commissioners transactions.

The particular constitutional responsibilities must be identified.

Evidence status: Wider Church governance relevance established.

PART VI — RESEARCH, ARCHIVAL AND PROFESSIONAL ORGANISATIONS

C.32. Grant Thornton UK LLP

Register ID: C-PRO-001
Organisation: Grant Thornton UK LLP
Professional field: Accounting, assurance and advisory services
Relationship to Project Spire: Commissioned forensic accounting research

Grant Thornton was engaged to investigate historical financial records associated with Queen Anne's Bounty.

Its work contributed to the findings published by the Church Commissioners.

This is a documented professional relationship.

However, the investigation has not yet completed reconciliation of all relevant contract values and fees.

The precise appointment and procurement records should be obtained.

Evidence status: Confirmed professional commission.

Source:

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

C.33. King's College London

Register ID: C-RES-001
Institution: King's College London
Type: University
Relationship to Project Spire: Relevant through identified academic expertise

Professor Arthur Burns has been identified in connection with the historical research.

However, the individual's academic affiliation should not automatically be treated as proof that the university itself received a Project Spire contract.

The investigation should distinguish personal academic contributions from institutional commissioning.

Evidence status: Academic association documented; contractual relationship requires verification.

C.34. University of Southampton

Register ID: C-RES-002
Institution: University of Southampton
Type: University
Relationship to Project Spire: Relevant through identified historical research expertise

Dr Helen Paul has been identified in relation to research concerning historical financial and economic matters.

However, the nature of any direct contractual relationship between the university and Project Spire requires confirmation.

Evidence status: Relevant academic association documented; institutional financial relationship unverified.

C.35. Lambeth Palace Library

Register ID: C-RES-003
Institution: Lambeth Palace Library
Type: Church of England archive and research institution
Relationship to Project Spire: Archival research and public historical interpretation

Published records describe Project Spire-related archival work.

The Library's professional and archival responsibilities are relevant to understanding historical research and personnel appointments.

However, employment, commissioning and budgetary arrangements must be verified.

The Library's role should remain distinct from the Church Commissioners' financial authority.

Evidence status: Documented archival connection.

Source:

https://www.lambethpalacelibrary.info/

C.36. Diocese of Southwark

Register ID: C-INS-005
Institution: Diocese of Southwark
Type: Church of England diocese
Relationship to Project Spire: Relevant public truth-telling events and professional-role documentation

The Diocese published a programme for a February 2026 truth-telling gathering.

The programme identifies Charmaine Simpson among participants and provides relevant professional information.

However, the event does not establish that the Diocese controlled Project Spire's financial decisions.

Its institutional responsibilities must be distinguished from those of the Church Commissioners.

Evidence status: Documented event and publication role.

PART VII — PERSONS ASSOCIATED WITH THE HISTORICAL RESEARCH

C.37. Professor Arthur Burns

Register ID: C-PER-001
Public affiliation: King's College London
Relevance: Historical research expertise

Professor Burns has been identified in connection with the Commissioners' historical research.

The investigation should establish whether his contribution involved formal review, consultancy, academic collaboration or another arrangement.

No remuneration figure or financial authority should be inferred without records.

Evidence status: Published academic involvement.

C.38. Dr Helen Paul

Register ID: C-PER-002
Public affiliation: University of Southampton
Relevance: Historical and economic research expertise

Dr Paul has been associated with historical research concerning the financial context examined by Project Spire.

The investigation should distinguish her academic work and public contributions from any direct contractual relationship with the Church Commissioners.

Evidence status: Documented research relevance.

C.39. Right Reverend David Urquhart

Register ID: C-PER-003
Relevant role: Chair of the Church Commissioners Board subgroup concerned with the response, as publicly identified in July 2023

The July 2023 Oversight Group announcement attributed a statement to Bishop David Urquhart in that capacity.

This establishes a documented role within the programme's governance development.

However, the register must distinguish that historical appointment from his current status.

His precise delegated authority should be confirmed through the relevant Board records.

Evidence status: Documented historical institutional role. <Cite ref="turn208803search2"/>

C.40. Right Reverend Dr Rosemarie Mallett

Register ID: C-PER-004
Relevant position: Bishop of Croydon
Project Spire role: Chair of the independent Oversight Group

Bishop Rosemarie Mallett was publicly appointed Chair of the Oversight Group in July 2023.

She also spoke publicly about the Group's recommendations.

These are documented responsibilities.

However, her chairing of the advisory Group does not automatically establish that she is a trustee of the proposed fund.

The current status of any continuing role should be verified.

Evidence status: Confirmed original appointment. <Cite refs={["turn208803search2","turn208803search5"]}/>

C.41. Geetha Tharmaratnam

Register ID: C-PER-005
Published position at appointment: Chief Impact Investment Officer, WHO Foundation
Project Spire role: Vice-Chair of the independent Oversight Group

Geetha Tharmaratnam was publicly appointed Vice-Chair in July 2023.

Her investment experience was relevant to the Group's deliberations.

However, the existence of that expertise and advisory role does not establish personal authority over the Church Commissioners' endowment.

Nor should a current employment position be inferred from the title published in 2023.

Evidence status: Documented historical appointment. <Cite ref="turn208803search2"/>

C.42. Roy Swan

Register ID: C-PER-006
Published professional affiliation at appointment: Ford Foundation
Project Spire relevance: Original Oversight Group member

Roy Swan was identified as Director of Mission Investments at the Ford Foundation when the Oversight Group membership was announced.

His professional experience was relevant to investment and social-impact questions.

However, membership did not automatically establish a financial or contractual relationship between the Ford Foundation and Project Spire.

Evidence status: Documented original membership. <Cite ref="turn208803search2"/>

C.43. Tara Sabre Collier

Register ID: C-PER-007
Published affiliation at appointment: Chemonics UK
Project Spire relevance: Original Oversight Group member

Tara Sabre Collier was publicly identified as bringing impact-investment and sustainable-finance expertise to the Group.

The record establishes advisory participation.

It does not establish that Chemonics UK received a Project Spire contract or held authority over fund investments.

Evidence status: Documented original membership. <Cite ref="turn208803search2"/>

C.44. Derek Bardowell

Register ID: C-PER-008
Published affiliation at appointment: Ten Years' Time
Project Spire relevance: Original Oversight Group member

Derek Bardowell was identified as an author and CEO of Ten Years' Time, with experience in community wealth creation.

His membership of the Oversight Group is documented.

However, the institutional or financial relationship between Ten Years' Time and Project Spire, if any, must be verified separately.

Evidence status: Documented original membership. <Cite ref="turn208803search2"/>

PART VIII — PROJECT SPIRE ARCHIVAL AND ENGAGEMENT PERSONNEL

C.45. Dr Annabelle Gilmore

Register ID: C-PER-009
Project Spire relevance: Archival research and coordination

Published material identifies Dr Annabelle Gilmore in relation to Project Spire-related archival work at Lambeth Palace Library.

Her work is relevant to the investigation of Church historical records and the interpretation of enslaved people's experiences.

However, the precise employing institution, appointment period, contractual terms and reporting responsibilities require confirmation.

The investigation must not infer financial control from her archival role.

Evidence status: Documented professional participation; appointment details outstanding.

C.46. Kwesi Ochosi

Register ID: C-PER-010
Project Spire role: Project Spire Coordinator: Archives
Other publicly documented affiliation: Founder, Building Trust Consortium

Separate event role: Chair of the Global Reparations Hub launch session, 17 October 2026

The Lambeth Palace Library blog published an article on 2 September 2026 identifying Kwesi Ochosi as Project Spire Coordinator: Archives.

This is direct documentary confirmation of his professional association with Project Spire.

The official UK Reparations Conference programme separately identifies him as Chair of the GRH launch session and founder of Building Trust Consortium.

These sources establish overlapping professional activity.

However, they do not establish that he exercised financial authority over the proposed fund.

They do not establish that the Church Commissioners authorised the GRH launch.

They do not establish improper conduct.

Evidence status: Project Spire archival role and GRH programme role documented. <Cite refs={["turn208803search3","turn208803search0"]}/>

Outstanding documents: Appointment terms, commissioning institution, period, supervisory authority, applicable declarations and any formal inter-organisational relationship.

C.47. Charmaine Simpson

Register ID: C-PER-011
Project Spire relevance: Church Commissioners research and engagement role
Separate organisational role: CEO and co-founder, Black History Studies
Separate event role: Named participant in the GRH launch programme

The Diocese of Southwark's February 2026 programme identifies Charmaine Simpson in its Church-related truth-telling work.

The published UK Reparations Conference programme identifies her as CEO of Black History Studies and a participant in the conference's reparations sessions and the GRH launch.

These documents establish relevant public roles.

However, the existence of the roles does not automatically establish direct financial relationships between Black History Studies, Project Spire and the GRH.

Nor does a research and engagement role establish authority over the £100 million commitment.

Evidence status: Documented professional and event participation. <Cite refs={["turn414368search0","turn208803search0"]}/>

Outstanding documents: Appointment terms, commissioning authority, financial and governance responsibilities, and any relevant declarations.

PART IX — EXTERNAL REPARATIONS ORGANISATIONS

C.48. Black History Studies

Register ID: C-REP-001
Organisation: Black History Studies
Public leadership: Charmaine Simpson
Relevant activities: Black historical education, public events and reparations-related discussion

Black History Studies appears in public records concerning Black history, educational activities and the GRH launch.

The organisation's activities should be examined through its own institutional records.

Its association with Charmaine Simpson does not automatically establish a Project Spire contractual relationship.

Any relevant financial connection must be supported by contracts, grant records or institutional confirmation.

Evidence status: Organisation and public association documented.

Project Spire financial relationship: Not established.

C.49. Building Trust Consortium

Register ID: C-REP-002
Organisation: Building Trust Consortium
Publicly associated individual: Kwesi Ochosi
Relevant activities: Reparations-related public engagement and professional activity

The UK Reparations Conference programme identifies Kwesi Ochosi as founder.

However, the organisation's complete legal identity, governing structure and funding arrangements require confirmation.

The investigation should determine whether it is incorporated, registered or operates through another legal arrangement.

It should also establish whether it had any direct Project Spire contract or grant.

Evidence status: Public association documented.

Formal Project Spire financial relationship: Not established.

C.50. Global Reparations Hub

Register ID: C-REP-003
Organisation: Global Reparations Hub
Relevant event: London launch associated with the UK Reparations Conference, 17 October 2026

The launch was included in the published conference programme.

The programme identified Kwesi Ochosi as Chair and Charmaine Simpson among the contributors.

However, the organisation's legal identity, internal authority, finance and decision-making arrangements belong primarily to RNL's separate GRH investigation.

The present register records only matters relevant to Project Spire.

Evidence status: Public launch arrangements documented.

Formal Project Spire governance relationship: Not established.

Formal Project Spire financial relationship: Not established. <Cite ref="turn208803search0"/>

C.51. APPG for Afrikan Reparations

Register ID: C-EVT-001
Body: All-Party Parliamentary Group for Afrikan Reparations
Relationship: Publisher of the UK Reparations Conference programme

The APPG's published programme provides evidence concerning announced events and participating individuals.

However, an All-Party Parliamentary Group is not automatically a statutory regulator or a government department.

Its role as a conference participant or organiser must remain distinct from the Church Commissioners' governance.

The publication of a programme does not establish that the APPG provided Project Spire funding.

Evidence status: Conference publication documented.

C.52. Quakers Reparations Working Group

Register ID: C-REP-004
Organisation: Quakers Reparations Working Group
Relevance: Participation in public reparations discussions and the 2026 conference

The conference programme identifies Rita Remi-Judah as Co-Clerk of the Quakers Reparations Working Group.

Her participation is relevant to the wider reparations context.

However, it does not establish that the Quakers Reparations Working Group possessed authority over Project Spire.

The organisation's own reparations activities should be examined separately.

Evidence status: Event participation documented. <Cite ref="turn208803search0"/>

C.53. CARICOM Reparations Commission

Register ID: C-REP-005
Body: CARICOM Reparations Commission
Relevance: Wider international reparations policy and historical claims

The Oversight Group referred to the wider reparations movement, including CARICOM's framework.

The 2026 conference also included persons publicly associated with CARICOM reparations work.

However, reference to CARICOM does not automatically establish that the Commission participated in Project Spire governance or received Project Spire funding.

Evidence status: International contextual relevance documented.

Formal Project Spire relationship: Requires separate verification.

C.54. African Union

Register ID: C-REP-006
Institution: African Union
Relevance: International reparatory justice context

The African Union is relevant to the wider international discussion of reparations.

However, the investigation has not established that it possesses formal authority over Project Spire.

Its historical and contemporary reparations activities should not be confused with the Church Commissioners' proposed charitable programme.

Evidence status: Relevant international institution.

Project Spire governance or financial relationship: Not established.

C.55. Independent grassroots Black/Afrikan reparations organisations

Register ID: C-REP-007
Category: Independent grassroots organisations potentially affected by or interested in the fund

The Oversight Group's consultation addressed communities affected by African chattel enslavement.

However, a complete list of longstanding grassroots organisations participating in the consultation has not been established.

RNL should therefore seek information concerning invitations, participation and continuing access.

No organisation should automatically be presumed to speak for all Black/Afrikan people.

Equally, grassroots expertise should not be excluded merely because it is not accompanied by large institutional resources.

Evidence status: Community participation broadly documented; organisation-level coverage requires verification.

PART X — SEPARATE BLACK CULTURAL CENTRE INSTITUTIONS

C.56. Islington Council

Register ID: C-INS-006
Institution: London Borough of Islington
Relevance: Separate Black Cultural Centre enquiry

The Council is relevant to questions concerning the Black Cultural Centre in Islington.

Those questions concern venue authority, arrangements and public communication.

However, the Council's involvement in a separate venue matter does not establish financial or governance responsibility for Project Spire.

The enquiry should remain separate unless a specific documentary connection emerges.

Evidence status: Separate institutional relevance.

C.57. Black Cultural Centre, Islington

Register ID: C-INS-007
Venue: Black Cultural Centre, Islington
Relevance: Separate GRH launch venue enquiry

The venue appeared in communications concerning a separately advertised GRH event.

The precise booking and cancellation chronology is being examined separately.

The venue should not automatically be treated as a Project Spire office, partner or funding recipient.

Evidence status: Separate venue-related enquiry.

PART XI — REPARATION NATION LIMITED AND THE INVESTIGATOR

C.58. Reparation Nation Limited

Register ID: C-RNL-001
Organisation: Reparation Nation Limited
Company Number: 14761041
Role: Independent investigator and compiler of the Project Spire report

RNL undertakes documentary examination of reparatory justice initiatives.

Its present investigation is independent of the Church Commissioners, Oversight Group and proposed fund.

RNL does not claim to possess statutory regulatory powers.

It seeks to establish historical facts, institutional authority, financial accountability, safeguards and actual reparatory delivery.

Evidence status: Investigative role established by the report.

C.59. Derrick Emmanuel Lynch — John Canoe

Register ID: C-RNL-002
Individual: Derrick Emmanuel Lynch
Also known as: John Canoe
Role: Investigator and authorising representative for the report

The investigator is responsible for defining the enquiries, preserving the documentary record and ensuring that findings remain consistent with the evidence.

The investigation expressly preserves the distinction between concerns, possibilities and findings of wrongdoing.

The investigator's public position concerning safeguards against anti-Black racism and Institutional Racism must remain accurately stated.

Evidence status: Report authorship and investigative responsibility.

C.60. Empress Judah

Register ID: C-PER-012
Relevant capacity: Correspondent and community participant associated with concerns concerning the GRH launch

Empress Judah's correspondence contributed to the initial context from which the wider enquiry developed.

Her concerns related principally to GRH communications and grassroots consultation.

They should be attributed accurately.

Her correspondence does not automatically establish that Project Spire's separate 2023 consultation was inadequate.

The complete content and chronology of her communications remain within the separate GRH investigation.

Evidence status: Attributed correspondence in RNL's investigation.

Project Spire contractual or governance role: Not established.

PART XII — MASTER INSTITUTIONAL RELATIONSHIP MATRIX

C.61. Established relationships

Relationship	Documented basis	Status
Queen Anne's Bounty → Church Commissioners	Historical institutional succession	Established
South Sea Company securities → Queen Anne's Bounty	Historical financial research	Documented
Church Commissioners → Project Spire	Institutional commissioning and response	Established
Church Commissioners Board → £100m commitment	Official decision and announcement	Established

Church Commissioners → Oversight Group	Formal appointment	Established
Oversight Group → Commissioners Board	Advisory recommendations	Established
Church Commissioners → Grant Thornton	Commissioned forensic accounting	Established
Project Spire → Lambeth Palace Library archival activities	Published professional records	Documented
Project Spire → Kwesi Ochosi archival role	September 2026 primary publication	Documented
Project Spire → Charmaine Simpson research/engagement role	Published Church-related information	Documented
Kwesi Ochosi → GRH launch	Official conference programme	Documented event role
Charmaine Simpson → GRH launch	Official conference programme	Documented event role
Charmaine Simpson → Black History Studies	Published professional identity	Documented
Kwesi Ochosi → Building Trust Consortium	Published conference identity	Documented

C.62. Relationships requiring verification

Possible relationship	Present evidential status
Church Commissioners → GRH funding	Not established
Church Commissioners → GRH governance	Not established
Project Spire → Black History Studies contract	Not established
Project Spire → Building Trust Consortium contract	Not established
Kwesi Ochosi → authority over £100m	Not established
Charmaine Simpson → authority over £100m	Not established

Original Oversight Group members → proposed fund trusteeship	Requires individual verification
Proposed fund → completed financial transfers	Requires verification
Proposed fund → completed grants	Requires verification
Church-wide racial-justice framework → Project Spire-specific tested safeguards	Operational application requires verification
Original consultation → representative mandate from all affected communities	Not established

The absence of a demonstrated relationship is not proof that the relationship could not exist.

It identifies the present limits of the evidence.

PART XIII — APPOINTMENT AND AUTHORITY QUESTIONS

C.63. The need for a complete institutional appointments register

The Church Commissioners should provide an appropriately disclosable list of Project Spire appointments.

The list should distinguish employees, contractors, advisers, consultants, researchers and volunteers.

It should identify the responsible institution, date of appointment, general duties and reporting arrangements.

Where the appointment is no longer active, the completion date should be recorded.

C.64. The need for a financial authority register

A separate register should identify the persons or bodies authorised to approve expenditure.

It should distinguish research budgets from the proposed £100 million fund capital.

It should identify who may approve contracts, investments and grants.

The existence of a professional title should not replace this evidence.

C.65. The need for a conflicts-of-interest register

Relevant institutions should explain their procedures for identifying external interests.

The register should distinguish the existence of affiliations from actual participation in decisions involving those interests.

Where a conflict was properly declared and managed, that should be recorded.

Where no relevant decision arose, the mere existence of an affiliation should not be treated as misconduct.

C.66. The need for a formal representation register

Where persons are described as community representatives, the basis of their authority should be identified.

The register should distinguish institutional appointment, organisational nomination, election, consultation and personal participation.

An individual should not automatically be described as representing every Black/Afrikan community because of their identity or professional experience.

C.67. The need for current professional-role verification

Publications from 2023, 2024, 2025 and 2026 may describe roles held at those dates.

The investigation should not assume that every role remains active.

The responsible institution should confirm current positions and any material changes.

PART XIV — SAFEGUARDS AND INSTITUTIONAL ACCOUNTABILITY

C.68. Safeguards against anti-Black racism and Institutional Racism

RNL seeks evidence of safeguards protecting relevant appointments, procurement, research, consultation, investments and grant-making decisions.

The Church of England possesses a wider racial-justice framework.

However, the effectiveness of those protections specifically within Project Spire remains a matter for documentary investigation.

The existence of Black professionals or advisers does not automatically establish that all institutional processes are protected against racial bias.

Equally, the absence of a policy supplied to RNL is not proof that discrimination occurred.

C.69. The right to challenge a professional appointment

Relevant procedures should explain how concerns about appointments or procurement can be raised.

The investigation should establish whether review mechanisms are available and how conflicts of interest are managed.

A challenge should be assessed according to the applicable duties and evidence.

An appointment should not be treated as improper merely because it is questioned.

C.70. The right to challenge institutional representation

A community organisation should be able to challenge an inaccurate statement that a person or group represents it.

Participation in consultation should not be treated as consent without evidence.

The investigation should seek accurate descriptions of appointment and mandate.

C.71. Financial transparency

Where external organisations receive public-facing reparatory programme funds, the relevant relationships should be appropriately documented.

However, the investigation should respect lawful confidentiality and privacy.

A suitable institutional account may identify a contract's purpose and value without disclosing unrelated personal information.

C.72. Protection against personal targeting

The register names individuals because their roles are relevant to institutional examination.

It must not be used to encourage harassment, intimidation or unsupported personal accusations.

The enquiry should focus upon documented duties, authority, financial relationships and institutional safeguards.

C.73. Peaceful resolution of institutional disagreement

RNL considers professional organisation, accurate information and effective complaints procedures essential foundations for peace.

The possibility of serious disagreements should be addressed through lawful communication and independent review.

The existence of disagreement does not justify assuming violent intentions on the part of any community or individual.

The investigation seeks to prevent avoidable conflict through evidence and transparency.

PART XV — CONSOLIDATED DISCLOSURE QUESTIONS

C.74. Questions to the Church Commissioners

Question C.1: Will the Commissioners provide an updated Project Spire organisational chart?

Question C.2: Who currently holds formal financial authority over the programme?

Question C.3: Which professional appointments were made directly by the Commissioners?

Question C.4: Which appointments were made through another Church institution?

Question C.5: What procedures governed appointment and remuneration?

Question C.6: What conflicts-of-interest policies applied?

Question C.7: What formal relationship, if any, exists between Project Spire and the GRH?

Question C.8: What financial relationship, if any, exists with Black History Studies?

Question C.9: What financial relationship, if any, exists with Building Trust Consortium?

Question C.10: What safeguards protect these processes against the possibility of anti-Black racism and Institutional Racism?

C.75. Questions to Lambeth Palace Library

Question C.11: What was the scope of the Project Spire archival research programme?

Question C.12: Which institution authorised the appointments?

Question C.13: What were the duties of Dr Annabelle Gilmore?

Question C.14: What were the duties of Kwesi Ochosi?

Question C.15: What did the title Project Spire Coordinator: Archives authorise?

Question C.16: What period did the relevant appointments cover?

Question C.17: What budget supported the work?

Question C.18: What reporting arrangements applied?

Question C.19: What published research outputs resulted?

Question C.20: What policies governed relevant external professional affiliations?

C.76. Questions to the proposed Fund for Healing, Repair and Justice

Question C.21: Has the fund been legally registered?

Question C.22: Who are its trustees, if appointed?

Question C.23: Who appoints or removes trustees?

Question C.24: What powers remain with the Church Commissioners?

Question C.25: What powers are held by affected communities?

Question C.26: Who approves investments?

Question C.27: Who approves grants?

Question C.28: What conflicts-of-interest procedures apply?

Question C.29: What independent complaints arrangements exist?

Question C.30: What public accountability records will be published?

C.77. Questions concerning external organisations

Question C.31: What formal legal identity does Building Trust Consortium possess?

Question C.32: Has Building Trust Consortium held any Project Spire contract?

Question C.33: Has Black History Studies held any Project Spire contract?

Question C.34: Did the Church Commissioners finance or sponsor any GRH activity?

Question C.35: Did any Project Spire professional participate in GRH activities under formal Church Commissioners authority?

Question C.36: Were relevant external interests declared where required?

Question C.37: Did any overlapping affiliation affect an identifiable financial decision?

Question C.38: What safeguards applied?

Question C.39: What records support the answers?

Question C.40: Will the responsible institutions provide formal written clarification?

C.78. Questions concerning community representation

Question C.41: How were Oversight Group members selected?

Question C.42: What authority did they possess?

Question C.43: How were participating community organisations identified?

Question C.44: What representative mandates, if any, were held by participants?

Question C.45: Can additional independent grassroots organisations contribute?

Question C.46: How will representatives be accountable?

Question C.47: What mechanisms permit correction of inaccurate claims of endorsement?

Question C.48: How will competing community perspectives be considered?

Question C.49: What safeguards prevent exclusion or racial bias?

Question C.50: What independent review will be available?

PART XVI — CORE SOURCE REGISTER

C.79. Church Commissioners and Oversight Group sources

C-SRC-001 — Church Commissioners for England

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england

C-SRC-002 — Oversight Group membership announcement, 24 July 2023

https://www.churchofengland.org/media/press-releases/church-commissioners-announce-members-oversight-group-advise-response-historic

C-SRC-003 — Oversight Group recommendations, 4 March 2024

https://www.churchofengland.org/media/press-releases/church-commissioners-england-warmly-welcomes-oversight-groups-report

C-SRC-004 — Oversight Group report

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

C-SRC-005 — Implementation update, March 2025

https://www.churchofengland.org/media/stories-and-features/commitment-action-our-continuing-journey

C.80. Professional and archival sources

C-SRC-006 — Grant Thornton historical research

https://www.grantthornton.co.uk/insights/investigating-the-churchs-links-to-slavery/

C-SRC-007 — Lambeth Palace Library

https://www.lambethpalacelibrary.info/

C-SRC-008 — Lambeth Palace Library blog, September 2026

https://monumentoffame.org/

C-SRC-009 — Archival placement account

https://www.memslib.co.uk/post/a-glimpse-into-the-archive-my-placement-at-lambeth-palace-library

C-SRC-010 — Diocese of Southwark truth-telling programme

https://southwark.anglican.org/wp-content/uploads/dlm_uploads/2026/01/Booklet_Diocesan-Truth-telling-gathering-Feb-26-1.pdf

C.81. External reparations sources

C-SRC-011 — UK Reparations Conference 2026 agenda

https://www.appg-ar.org/uk-reparations-conference-2026-agenda

C-SRC-012 — UK Reparations Conference 2026 event details

https://www.appg-ar.org/uk-reparations-conference-2026-register

C-SRC-013 — Charity Commission register

https://register-of-charities.charitycommission.gov.uk/

C-SRC-014 — Church Commissioners' related documents

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/related-documents

C-SRC-015 — Church Commissioners' FAQs

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

The links should be retained within the permanent evidence library together with source dates, original files where available and any relevant subsequent corrections.

PART XVII — CONSOLIDATED FINDINGS

C.82. Principal institutions established

The Church Commissioners are the principal institution responsible for Project Spire.

The independent Oversight Group was appointed to provide advice.

Lambeth Palace Library undertook relevant archival work.

Grant Thornton was involved in the forensic accounting research.

The Charity Commission is relevant to proposed charity registration and regulatory authorisation.

These relationships are sufficiently documented to justify inclusion in the register.

C.83. Professional roles established

Published records identify archival and engagement roles involving Dr Annabelle Gilmore, Kwesi Ochosi and Charmaine Simpson.

The September 2026 Lambeth Palace Library publication provides explicit confirmation of Kwesi Ochosi's Project Spire archival coordination role.

The Diocese of Southwark programme provides relevant documentation concerning Charmaine Simpson's Church-related engagement role.

These findings should be preserved.

C.84. External professional overlap established

The official UK Reparations Conference programme identifies Kwesi Ochosi and Charmaine Simpson among the people associated with the GRH launch.

Their relevant Project Spire-related professional roles are documented separately.

This establishes professional overlap.

However, it does not establish common financing or governance.

C.85. Formal financial relationships not established

The investigation has not established that Project Spire funded the Global Reparations Hub.

It has not established that Black History Studies or Building Trust Consortium received Project Spire money.

It has not established that the named research and archival personnel controlled the proposed £100 million fund.

These relationships remain matters for clarification.

C.86. No findings of individual wrongdoing

The register does not establish misconduct by any named individual.

It does not establish unlawful procurement, improper conflicts of interest, corruption or discriminatory acts.

Any future finding would require appropriate decision-specific evidence.

The existence of professional associations is not sufficient.

C.87. Safeguards remain an outstanding issue

The wider Church of England racial-justice framework is documented.

However, the application and demonstrated effectiveness of Project Spire-specific safeguards remain open questions.

RNL therefore seeks formal documentary evidence.

The enquiry concerns the possibility of anti-Black racism and Institutional Racism, not a predetermined allegation of wrongdoing.

PART XVIII — FORMAL CONCLUSION

C.88. Institutional and personnel assessment

The investigation has identified a network of historical institutions, contemporary governing bodies, researchers, advisers, community organisations and public participants relevant to Project Spire.

Some relationships are formal and documented.

Others concern public event participation.

Some are merely potential relationships requiring verification.

The distinctions are fundamental.

The Church Commissioners' governance and financial authority should not be attributed automatically to researchers, advisers or community representatives.

The existence of professional roles within Project Spire does not automatically create authority over the proposed fund.

Similarly, participation in the Global Reparations Hub launch does not establish that the Church Commissioners financed or controlled the GRH.

The investigation must preserve the actual boundaries of responsibility.

C.89. Final conclusion of Appendix C

The records establish that Project Spire developed through the Church Commissioners' institutional processes and drew upon professional historical, archival, financial and community expertise.

The named appointments and public affiliations provide legitimate grounds for further questions about commissioning, declarations and institutional responsibilities.

However, the available evidence does not establish that those professional relationships were improper.

Nor does it establish shared financial control between Project Spire and the GRH.

The central conclusion of Appendix C is that the investigation has identified and classified the principal institutions, organisations and persons relevant to Project Spire, while the precise legal, contractual, financial and representative authority of several relationships remains subject to further documentary verification.

The register should therefore remain open to correction, formal institutional responses and subsequent evidence.

RNL will continue to distinguish documented identity from institutional membership, professional participation from representation, and organisational association from financial control.

APPENDIX C — STATUS CERTIFICATION

Appendix: C of F
Title: Institutions, Organisations and Persons Register
Prepared: 18 October 2026
Document status: Completed as a consolidated draft
Institutional identities: Principal institutions identified
Professional roles: Relevant roles documented, with outstanding terms identified
Formal Project Spire–GRH financial relationship: Not established
Formal Project Spire–GRH governance relationship: Not established
Conflicts of interest: No finding of improper conduct
Anti-racism safeguards: Further documentary examination required
Right of reply: Remains available to all materially affected parties

Prepared for and on behalf of Reparation Nation Limited

Derrick Emmanuel Lynch
Also known as John Canoe
Company Number: 14761041

The formal signature and authorisation page will appear once, after Appendix F.

END OF APPENDIX C OF F — INSTITUTIONS, ORGANISATIONS AND PERSONS REGISTER

NEXT: APPENDIX D OF F — FINANCIAL ACCOUNTABILITY AND REPARATORY DELIVERY REGISTER: COMMITMENTS, PREPARATORY EXPENDITURE, PROFESSIONAL FEES, REGULATORY TRANSFERS, INVESTMENTS, GRANTS, BENEFICIARY RECEIPTS AND INDEPENDENT VERIFICATION.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

APPENDIX D OF F

FINANCIAL ACCOUNTABILITY AND REPARATORY DELIVERY REGISTER: COMMITMENTS, PREPARATORY EXPENDITURE, PROFESSIONAL FEES, REGULATORY TRANSFERS, INVESTMENTS, GRANTS, BENEFICIARY RECEIPTS AND INDEPENDENT VERIFICATION

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Document status: Consolidated financial register accompanying Sections 1–24 and Appendices A–C. Published amounts, institutional statements, outstanding transactions and proposed verification procedures are distinguished. No completed financial transfer or reparatory benefit is presumed without supporting evidence.

PART I — PURPOSE, AUTHORITY AND FINANCIAL STANDARDS

D.1. Purpose of this appendix

This appendix establishes the financial accountability framework for Reparation Nation Limited's independent investigation into Project Spire and the proposed Fund for Healing, Repair and Justice.

Its central purpose is to identify the financial resources associated with Project Spire and determine what has happened to those resources.

The investigation must distinguish the original institutional commitment from the preparatory expenditure incurred in developing the programme.

It must also distinguish legal authorisation from actual transfer, investment from grant-making, financial receipt from verified reparatory benefit, and institutional intention from completed delivery.

Project Spire involves a substantial proposed financial response to the Church Commissioners for England's historical connections with African chattel enslavement.

The Commissioners announced a £100 million commitment in January 2023.

They subsequently undertook research, governance development, consultation and legal preparation.

However, those activities should not automatically be represented as £100 million of reparatory value delivered.

The financial record must therefore be precise.

RNL seeks a permanent and independently reviewable account of **what was promised, what was authorised, what was spent, what was transferred, what was invested, what was received and what benefit was verified**.

D.2. The importance of a complete money trail

Financial accountability requires more than the publication of a headline amount.

A financial commitment may be announced long before its intended recipient becomes operational.

Money may remain within the original institution while legal and regulatory arrangements are prepared.

Professional advisers may be paid to develop the programme.

Investment capital may later be transferred to a separate charity.

That charity may invest in businesses or provide grants.

Each stage has a different legal and financial significance.

Without a complete register, the public may mistake a commitment for a completed transfer or an investment for compensation received.

This appendix is designed to prevent such confusion.

D.3. The principal accounting distinction

The financial investigation recognises the following sequence:

Announcement → Commitment → Authorisation → Allocation → Transfer → Investment or Grant → Receipt → Verified Reparatory Outcome.

These stages are not necessarily required to occur in one fixed order for every transaction.

For example, preparatory expenditure may occur before a separate fund receives assets.

However, the stages must remain distinct.

The same money should not be counted several times merely because it passes through successive accounting classifications.

D.4. The difference between preparatory expenditure and reparatory expenditure

Preparatory expenditure concerns the work required to research, establish, administer and develop the programme.

Examples may include forensic accounting, historical research, legal advice, governance development, public consultation and communications.

Reparatory expenditure concerns resources actually deployed for the intended benefit of affected communities.

The distinction is not intended to dismiss the usefulness of preparatory work.

Historical research and responsible legal preparation may contribute to reparatory justice.

However, paying a professional adviser is not automatically the same as paying a reparatory beneficiary.

The register must therefore classify these expenditures separately.

D.5. RNL's formal investigative position

RNL maintains:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

The financial investigation seeks evidence of lawful authorisation, appropriate accounting, transparent financial relationships and safeguards against possible racial bias within financial decision-making.

The absence of financial information supplied to RNL does not establish misuse of money.

However, the absence of a complete reconciliation is a legitimate reason to seek further documentary clarification.

D.6. Financial evidence classifications

Code	Classification	Meaning
F-ANN	Announced	Publicly stated financial intention
F-COM	Committed	Formal undertaking identified
F-AUT	Authorised	Relevant legal or institutional approval established

F-ALL	Allocated	Resources assigned to a purpose
F-BUD	Budgeted	Approved or proposed future spending
F-EXP	Expended	Expenditure actually incurred
F-TRF	Transferred	Completed movement of money or assets
F-INV	Invested	Completed investment transaction
F-GRA	Granted	Formal non-repayable award
F-REC	Received	Receipt by the intended financial recipient verified
F-OUT	Outcome verified	Evidence of intended reparatory benefit
F-EST	Estimated	Amount based upon a disclosed estimation method
F-DIS	Disputed	Figure or interpretation challenged
F-UV	Unverified	Insufficient evidence to confirm amount or transaction
F-OR	Outstanding record	Accounting record or supporting document still required

These classifications are intended to be applied to individual transactions.

They should not be assigned to an entire programme without regard to its separate financial components.

PART II — CONSOLIDATED FINANCIAL POSITION

D.7. Original £100 million commitment

Register ID: SPIRE-D-FIN-001

Date announced: 10 January 2023

Institution: Church Commissioners for England

Amount: £100,000,000

Purpose: Proposed investment, research and engagement response to historical links with African chattel enslavement.

Classification: F-ANN / F-COM.

Status: Official institutional commitment established.

The Commissioners announced that the commitment would be delivered over nine years commencing in 2023.

The original response involved the development of a new impact investment fund intended to produce long-term benefit.

The commitment is substantial.

However, it does not establish that £100 million was immediately transferred to a separate charity.

It does not establish completed grants or compensation payments to individuals.

Primary source:

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

D.8. Purpose of the proposed financial response

The Commissioners' public explanations describe an investment-led programme intended to address continuing consequences of African chattel enslavement.

They distinguish this programme from direct individual compensation.

This distinction matters because the word *reparations* may be understood differently by institutions, campaigners and intended beneficiaries.

A programme that invests capital for long-term social benefit may be financially and practically different from direct compensation.

The investigation should describe the actual proposed mechanism.

It should not present one form of reparatory activity as another.

D.9. Proposed £1 billion-plus ambition

Register ID: SPIRE-D-FIN-002

Amount: £1,000,000,000 or more

Origin: Independent Oversight Group recommendation.

Classification: F-ANN / proposed ambition.

Status: Documented ambition, not verified secured capital.

The Oversight Group recommended that the programme should develop beyond the original £100 million commitment.

The Commissioners publicly supported the ambition while maintaining that their own commitment remained £100 million.

The larger target may involve additional financial participation by other institutions and future investment growth.

However, none of those prospective components should be counted as received without evidence.

D.10. The Commissioners' own funding commitment remains £100 million

The Church Commissioners' official FAQ states that their funding commitment has not increased from £100 million.

It expresses the hope that additional capital will be attracted from other participants.

This is a material limitation upon any description of the proposed fund's size.

A £1 billion ambition must not be presented as though the Commissioners themselves committed £1 billion.

Similarly, anticipated investment returns should not be recorded as already realised.

Official source:

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

D.11. Source of the proposed £100 million

Register ID: SPIRE-D-FIN-003

The Commissioners have explained that the proposed commitment is to be financed from the endowment under their management.

They have distinguished that source from direct parish collections and money given to individual parish churches.

This is important for understanding the origin of the proposed resources.

However, an endowment is subject to relevant charitable and institutional obligations.

The investigation must therefore distinguish the source of the money from the legal power to settle it upon a new charitable entity.

Status: Official explanation documented.

D.12. The endowment's reported value

Register ID: SPIRE-D-FIN-004

Reporting date: 31 December 2025

Reported value: £11.6 billion.

Reported 2025 investment return: 8%.

The Commissioners published these figures on 25 May 2026.

They provide relevant context concerning the size of the institution's investment portfolio.

However, they are not equivalent to unrestricted cash available for immediate reparatory distribution.

The endowment includes investments whose management is governed by financial and charitable obligations.

Its total valuation should not be added to the proposed £100 million commitment as though they were two independent reparatory funds.

Primary source:

https://www.churchofengland.org/media/finance-news/church-commissioners-england-endowment-fund-delivers-8-return-2025

D.13. The relationship between the £100 million and endowment value

The £100 million commitment represents a relatively small proportion of the reported £11.6 billion endowment when considered as a simple comparison of financial amounts.

However, this comparison alone does not determine affordability or legal authority.

A proper assessment must consider the relevant period, expected distributions, charitable obligations, financial restrictions and intended deployment.

It should also examine the rationale used by the Board when selecting the commitment.

RNL should not substitute a simple percentage for the institution's complete financial and legal analysis.

The proportionality question remains legitimate.

It requires appropriate evidence.

PART III — PREPARATORY EXPENDITURE

D.14. The reported approximately £1 million expenditure

Register ID: SPIRE-D-EXP-001

Reporting period: 2019 to 31 December 2024 inclusive.

Amount: Approximately £1 million.

Classification: F-EXP.

Source: Official parliamentary answer dated 30 August 2025.

The Commissioners stated that this expenditure related to commissioning research and developing their formal response.

They identified forensic accounting, risk management, consultation, engagement events, communications, governance and ancillary expenditure.

This is a documented financial statement.

However, the figure is approximate.

The response did not provide a complete transaction ledger.

Primary source:

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

D.15. The exclusion of internal staff time

The Commissioners expressly excluded an estimate of internal staff time from the approximately £1 million figure.

They explained that the time could not readily be separated from general Secretariat administration without disproportionate cost.

This means the reported amount should not be represented as the complete economic cost of Project Spire through December 2024.

However, the absence of a staff estimate does not justify inventing an additional amount.

The appropriate response is to obtain any available aggregated staff-cost information or a documented explanation of why a reasonable estimate cannot be produced.

D.16. Annual preparatory expenditure register

Financial year	Amount established through this investigation	Status
2019	Not separately identified	Breakdown outstanding
2020	Not separately identified	Breakdown outstanding

2021	Not separately identified	Breakdown outstanding
2022	Not separately identified	Breakdown outstanding
2023	Not separately identified	Breakdown outstanding
2024	Not separately identified	Breakdown outstanding
2019–2024 combined	**Approximately £1 million**	Official aggregate figure
2025	Not yet reconciled	Outstanding
2026 to latest available date	Not yet reconciled	Outstanding

The individual years must not be assigned arbitrary portions of the aggregate amount.

The combined figure is not a separate additional cost to be added to the component years when those figures become available.

D.17. Forensic accounting expenditure

Register ID: SPIRE-D-EXP-002

Grant Thornton undertook relevant forensic accounting research.

The parliamentary expenditure statement includes forensic accounting as a spending category.

However, the complete amount associated with the professional services has not been independently reconciled within this register.

The investigation should obtain the contractual scope, original value, amendments, invoices and final fees.

Published annual accounts may provide additional supporting information.

The existence of a legitimate professional service does not establish that the amount spent was improper.

The objective is financial transparency and value-for-money assessment.

D.18. Historical research expenditure

Register ID: SPIRE-D-EXP-003

The Commissioners used historical and academic expertise to examine financial and archival records.

Such work may involve direct employment, institutional collaboration, commissioned consultancy or other arrangements.

The exact financial classification matters.

A payment to an academic institution should not automatically be described as an individual consultancy fee.

A researcher's public participation should not be treated as proof of remuneration.

The investigation should seek the original terms and actual payment records.

D.19. Risk management expenditure

Register ID: SPIRE-D-EXP-004

The approximately £1 million expenditure statement includes risk management.

However, no complete itemised account of this category has been obtained.

The investigation should establish whether the expenditure concerned financial, historical, legal, operational or reputational risk.

It should identify the commissioning institution and the services obtained.

The term *risk management* should not be used as a substitute for identifying the actual work commissioned.

D.20. Consultation expenditure

Register ID: SPIRE-D-EXP-005

The Commissioners undertook consultation and engagement activities during 2023.

These included facilitated meetings and a global questionnaire.

Relevant expenditure may include administration, facilitation, travel, venues, accessibility and research.

However, the exact amounts remain to be established.

The investigation should seek a proportionate breakdown of the costs and the organisations responsible for delivering the work.

It should also establish whether additional consultation expenditure occurred during 2024–2026.

D.21. Engagement events expenditure

Register ID: SPIRE-D-EXP-006

The official expenditure statement includes engagement events.

However, the investigation has not obtained a complete list of event costs.

The financial register should identify the relevant events, organisers, paying institution, supplier categories and approved expenditure.

An event programme does not, by itself, establish which institution paid the costs.

Similarly, an individual's appearance at an event is not proof that the individual received a fee.

Payment must be supported by financial evidence.

D.22. Communications expenditure

Register ID: SPIRE-D-EXP-007

The Commissioners included communications within reported Project Spire expenditure.

Communications may involve reports, websites, public statements, professional advice or event publicity.

However, the amounts and suppliers require verification.

The investigation should distinguish general institutional communication from expenditure specifically attributable to Project Spire.

It should also evaluate whether public communication costs are classified separately from reparatory delivery.

D.23. Governance development expenditure

Register ID: SPIRE-D-EXP-008

The Commissioners undertook work to develop the proposed fund's governance and institutional arrangements.

The expenditure statement includes governance costs.

However, the complete amounts have not been established.

The investigation should identify any relevant legal, financial or organisational consultancy contracts.

It should also determine how the costs were authorised.

D.24. Legal and regulatory preparation costs

Register ID: SPIRE-D-EXP-009

The proposed fund requires appropriate legal and regulatory arrangements.

Legal services may be necessary to prepare governing documents, applications and related advice.

However, no complete Project Spire legal-fees schedule has been obtained.

The investigation should request aggregated legal costs, relevant service categories and the period involved.

Where legal professional privilege applies, the institution should identify the appropriate limitations.

The purpose is financial accountability without requiring disclosure of protected advice.

D.25. Ancillary expenditure

Register ID: SPIRE-D-EXP-010

The parliamentary response included ancillary expenditure without supplying a complete itemised explanation.

The investigation should request the meaning of this category.

It should establish whether the costs concern administration, travel, support services or other identifiable activities.

The term *ancillary* should not become a permanent unexplained residual category where further appropriate detail can be supplied.

PART IV — DISPUTED FINANCIAL FIGURES

D.26. The alleged £5 million historical expenditure

Register ID: SPIRE-D-DIS-001

A parliamentary question raised the proposition that £5 million had already been spent on Project Spire.

The Church Commissioners rejected that amount.

The claim must therefore be recorded as disputed and not established.

It should not be incorporated into the financial ledger as actual expenditure.

Primary source:

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

D.27. The alleged £5 million forecast for 2026–28

Register ID: SPIRE-D-DIS-002

A separate parliamentary question referred to an alleged £5 million spending forecast for 2026–28.

The Commissioners stated on 1 September 2025 that this was not a forecast figure they recognised.

This claim concerns prospective spending rather than expenditure already incurred.

It must remain separately classified.

Primary source:

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

D.28. The correct treatment of disputed figures

A financial claim appearing in a parliamentary question is not automatically established.

An official institutional rebuttal is relevant evidence.

However, the appropriate long-term solution is a complete financial reconciliation.

The investigation should preserve both the disputed claim and the response.

It should then seek the underlying accounts.

No disputed figure should be silently inserted into the verified expenditure total.

PART V — FINANCIAL AUTHORITY AND REGULATORY CONTROL

D.29. The September 2025 general-fund statement

Register ID: SPIRE-D-AUT-001

On 1 September 2025, the Commissioners stated that the £100 million remained within their general fund pending regulatory authorisation.

They also explained that the resources would not be deployed before the necessary approval had been obtained.

This is a significant official financial-status statement.

However, it concerns the position at that date.

It must not automatically be treated as a current transaction record covering every subsequent period.

D.30. Proposed charitable registration

Register ID: SPIRE-D-AUT-002

The Commissioners have described plans to establish a new charitable entity.

The current official FAQ examined for this report states that the relevant registration application has not yet been made.

This is important to financial accountability because the legal identity of a receiving charity must be established before transactions can be traced through its accounts.

Status: Official public position; ongoing verification required.

D.31. Proposed section 106 authorisation

Register ID: SPIRE-D-AUT-003

The Commissioners have identified a potential statutory ex gratia route under section 106 of the Charities Act 2011.

The precise authorisation required must be examined in relation to the proposed transfer.

An application is not equivalent to approval.

An approval is not necessarily evidence that the approved transfer occurred.

The investigation should preserve each stage separately.

D.32. Authority to approve expenditure

The investigation should identify which body or officer approved preparatory expenditure.

This may differ from the body ultimately authorised to commit or transfer the proposed fund capital.

For example, professional research invoices may be approved through delegated administrative processes.

A substantial charitable transfer may require separate Board and regulatory authority.

The two types of decision should not be confused.

D.33. Authority to transfer capital

Register ID: SPIRE-D-AUT-004

The actual legal basis for transferring any of the proposed £100 million must be documented.

The investigation should establish the relevant decision, approving body, statutory power and regulatory requirements.

Where a transfer is completed, its amount, date and receiving institution should be recorded.

Where no transfer has occurred, the responsible institution should confirm that position.

D.34. Authority over the proposed fund after transfer

If a separate charity becomes operational, the investigation should identify which persons possess authority over its assets.

This may include trustees and authorised investment or grant-making officers.

However, the exact arrangements should not be presumed before the governing document is available.

The investigation should examine any rights retained by the Church Commissioners.

It should also examine how Black community leadership is implemented.

PART VI — PROFESSIONAL FEES AND INSTITUTIONAL RELATIONSHIPS

D.35. Professional payments register

The following information should be obtained for each material professional-services arrangement.

Field	Required information
Contract reference	Unique identifier
Contracting institution	Legal person authorising payment
Supplier	Individual or organisation receiving the contract
Services	Work commissioned
Start and end dates	Contract period
Original approved value	Initial financial commitment

Amendments	Variations and extensions
Actual amount paid	Supported by financial records
Deliverables	Reports, advice, research or other outputs
Approval authority	Body or officer authorising expenditure
Conflict safeguards	Declarations and decision-specific measures
Evidence	Contract, invoice, accounts or official statement

The register should distinguish personal employment from external contracts.

D.36. Grant Thornton fees

Register ID: SPIRE-D-PRO-001

Grant Thornton's forensic accounting work is documented.

The Commissioners have referred to relevant disclosures within published annual accounts.

However, this appendix does not insert a precise consolidated fee total without reconciling those records.

The investigation should extract the figures from the original annual statements and determine whether they all concern Project Spire.

The resulting amount should be entered only after the basis of reconciliation is clear.

D.37. Academic consultancy fees

Register ID: SPIRE-D-PRO-002

Published material identifies academic research expertise associated with the historical investigation.

However, the precise remuneration arrangements have not been established.

The investigation should determine whether payments were made directly to individuals, universities or other contracting bodies.

It should distinguish consultancy fees from grants or ordinary salary arrangements.

D.38. Lambeth Palace Library research costs

Register ID: SPIRE-D-PRO-003

Public material identifies archival research activity involving Dr Annabelle Gilmore and Kwesi Ochosi.

However, the financial arrangements supporting their roles require confirmation.

The investigation should determine which institution employed or commissioned the relevant personnel.

It should also identify the relevant budgetary source.

A published professional role does not establish a particular salary, consultancy fee or authority over programme capital.

D.39. Charmaine Simpson's research and engagement role

Register ID: SPIRE-D-PRO-004

Charmaine Simpson's Church-related research and engagement role is publicly documented.

However, the nature of her remuneration and the contracting arrangements have not been established through the evidence consolidated here.

The responsible institution should explain whether the role was employment, consultancy or another arrangement.

The enquiry must not infer a payment to Black History Studies merely from her separate organisational leadership.

D.40. Kwesi Ochosi's archival coordination role

Register ID: SPIRE-D-PRO-005

Kwesi Ochosi's role as Project Spire Coordinator: Archives is publicly documented.

The investigation should establish the institutional budget and appointment arrangement.

However, the role does not itself demonstrate control over the £100 million commitment.

Nor does it establish that Building Trust Consortium received Project Spire funds.

The financial questions remain separate.

D.41. Black History Studies financial relationship

Register ID: SPIRE-D-EXT-001

Question: Did Black History Studies receive Project Spire-related payments?

Present evidence: Professional and organisational overlap documented.

Financial conclusion: No such payment established by the evidence examined.

Required verification: Institutional accounts, contracts or formal written confirmation.

This entry is an investigative question, not an accusation.

D.42. Building Trust Consortium financial relationship

Register ID: SPIRE-D-EXT-002

Question: Did Building Trust Consortium receive Project Spire-related payments?

Present evidence: Kwesi Ochosi's separate organisational association and archival role are documented.

Financial conclusion: No such payment established by the evidence examined.

Required verification: Legal-entity identification, contract records or formal written confirmation.

D.43. Global Reparations Hub financial relationship

Register ID: SPIRE-D-EXT-003

Question: Did the Church Commissioners or Project Spire provide funding, sponsorship or financial support to the Global Reparations Hub?

Present evidence: Certain overlapping professional roles are documented.

Financial conclusion: No formal financial relationship established through those records.

The GRH's own funding investigation remains separate.

D.44. GRH launch expenditure

Register ID: SPIRE-D-EXT-004

Question: Did any Project Spire budget support the GRH launch of 17 October 2026?

The conference programme identifies the launch.

However, the programme does not establish that the Church Commissioners financed it.

The investigation should seek confirmation from the responsible organisations.

The existence of an event is not proof of a particular funding source.

PART VII — INVESTMENT ACCOUNTABILITY

D.45. Proposed impact investment

Register ID: SPIRE-D-INV-001

The proposed fund is intended to use impact investment to support long-term reparatory benefits.

This approach differs from distributing the whole commitment immediately through grants.

Investment capital may remain within the fund as an asset.

The investigation must therefore identify what is actually invested and how those investments are expected to benefit affected communities.

D.46. Investment transaction requirements

Each completed investment should be recorded using the following information:

Field	Required evidence
Investment ID	Unique reference
Investment date	Date capital was deployed
Capital amount	Amount and currency
Investing entity	Institution owning the investment
Recipient	Business, fund or other entity
Instrument	Equity, debt or other arrangement
Investment purpose	Documented social or economic objective
Approval	Authorised decision
Risk assessment	Relevant investment analysis
Management fees	Amounts and basis
Financial returns	Income, gains or losses
Community impact	Evidence of intended benefit
Verification	Audit or independent review

No entry should be classified as completed merely because it appeared in a proposed investment strategy.

D.47. Ownership of invested capital

The investigation should identify who owns investment assets after capital is deployed.

An investment in a business is not necessarily a gift to that business.

An equity investment may produce ownership rights.

A loan may create an obligation to repay.

A grant is different because it is ordinarily non-repayable, subject to its terms.

These distinctions affect how reparatory benefits should be measured.

D.48. Investment returns

The programme may seek investment returns that can support future activity.

However, forecast returns should not be treated as realised returns.

Realised returns should be distinguished from unrealised valuation changes.

Returns retained within the fund should not automatically be described as money received by affected communities.

The register must therefore identify where value accumulates.

D.49. Investment losses

A complete accounting must also record investment losses.

A reparatory investment strategy may involve financial risk.

The investigation should therefore examine the procedures for identifying, managing and reporting losses.

Failure of an investment does not automatically establish mismanagement.

However, transparent reporting is necessary to evaluate outcomes.

D.50. Investment management fees

The investigation should identify any payments to investment managers, custodians, advisers or other intermediaries.

These fees should be distinguished from grants and beneficiary receipts.

The programme should explain how management costs are authorised and whether they are charged against fund capital or investment returns.

PART VIII — GRANT-MAKING AND VERIFIED REPARATORY BENEFITS

D.51. Proposed grant-making

Register ID: SPIRE-D-GRA-001

The proposed programme includes grant-making intended to support relevant organisations and communities.

However, the official public information examined continues to describe the fund as not operational.

A proposed grant-making programme should not therefore be represented as completed grant distribution without separate evidence.

D.52. Grant award register

Field	Required information
Grant ID	Unique reference
Award date	Date of approval
Grant-making entity	Legal awarding institution
Recipient	Identifiable organisation or beneficiary category
Purpose	Approved project or activity
Award amount	Value approved
Payment date	Actual transfer date
Amount paid	Value disbursed
Conditions	Relevant grant terms
Receipt	Recipient acknowledgement
Outcome	Evidence of resulting benefit
Status	Approved, paid, received, completed or corrected

An awarded amount must not be counted as received before the payment is verified.

D.53. Recipient eligibility

The proposed fund should identify its beneficiary eligibility criteria.

These should relate to its approved charitable purposes and intended reparatory objectives.

The investigation should examine whether smaller or unincorporated grassroots organisations can participate where appropriate.

Eligibility criteria may require safeguards to protect charitable assets.

However, the requirements should be transparent and proportionate.

D.54. Community organisations as direct recipients

A grant may be awarded directly to a community organisation.

In that case, the investigation should establish the amount received and the work undertaken.

The recipient organisation should not automatically be treated as representing every person within the wider community.

The benefit should be assessed according to the approved purpose and actual results.

D.55. Financial intermediaries

Some funding arrangements may use intermediaries.

For example, money may be transferred to a managing institution before reaching a final community project.

The investigation should identify each stage.

A payment to an intermediary should not automatically be recorded as final reparatory receipt.

The financial register should distinguish intermediary custody from ultimate benefit.

D.56. Direct individual compensation

The Commissioners' official FAQ distinguishes their proposed programme from direct compensation to individuals.

This should be recorded accurately.

The investigation should not imply that affected individuals are automatically entitled to apply for direct cash payments under a scheme that has not been described in those terms.

This does not resolve wider political or moral questions about the desirability of compensation.

It establishes the proposed programme's stated financial model.

D.57. Verified beneficiary receipt

Register ID: SPIRE-D-REC-001

A receipt should be classified as verified only where adequate supporting evidence exists.

This may include an audited account, payment confirmation or recipient acknowledgement.

The investigation should protect confidential financial information.

Where individual details cannot appropriately be published, aggregate independent verification may be used.

The purpose is to establish that resources actually reached the intended recipient.

D.58. Verified reparatory outcomes

Register ID: SPIRE-D-OUT-001

A reparatory outcome should be evaluated through evidence relevant to the programme's purpose.

Examples might include sustained community services, educational opportunities, employment, cultural restoration or other intended benefits.

These examples do not establish that Project Spire has already achieved such outcomes.

They identify possible categories for future evaluation.

An outcome should not be counted merely because the institution expected it to occur.

D.59. The importance of unsuccessful outcomes

Where funding fails to achieve its intended purpose, the result should be recorded.

A complete reparatory register must not contain only success stories.

It should also identify delays, losses, incomplete projects and corrected claims.

The objective is reliable delivery assessment rather than publicity.

PART IX — ACCOUNTING RECONCILIATION

D.60. The master reconciliation table

Financial matter	Documented amount or position	Verification status
Original Commissioners commitment	£100 million	Officially announced
Oversight Group expansion ambition	£1 billion-plus	Proposed ambition, not secured amount

Commissioners endowment at 31 Dec 2025	£11.6 billion	Published valuation; not reparatory capital
2025 endowment investment return	8%	Published portfolio performance
Project Spire expenditure 2019–2024	Approximately £1 million	Official aggregate; excludes internal staff time
Expenditure during 2025	Not established here	Breakdown outstanding
Expenditure during 2026	Not established here	Breakdown outstanding
Alleged £5 million historical spending	Disputed	Commissioners rejected figure
Alleged £5 million 2026–28 forecast	Disputed	Commissioners did not recognise figure
£100 million within general fund, September 2025	Official dated position	Current status requires recheck
Charity registration	Official page says application not yet made	Recheck required
Regulatory authorisation	Official page says application not yet made	Recheck required
Completed capital transfers	No complete verified schedule obtained	Outstanding
Completed impact investments	No verified transaction register obtained	Outstanding
Completed reparatory grants	No verified awards/payment register obtained	Outstanding
Verified ultimate beneficiary receipt	No verified register obtained	Outstanding

Important: “Not established” does not mean zero. It means that the amount or transaction has not been verified through the records examined.

D.61. Avoiding double counting

The original £100 million commitment should appear once in the commitment register.

If £100 million is later transferred to a separate charity, the transfer should be linked to that original commitment.

It should not be counted as another £100 million contribution.

If part of the transferred capital is then invested, that investment should be linked to the same resources.

A grant financed from investment returns should be recorded separately, but the relationship to the original fund should remain traceable.

This prevents a misleading multiplication of financial amounts.

D.62. Avoiding undercounting

The approximately £1 million historical expenditure figure excludes internal staff time.

It also ends in December 2024.

Therefore, it must not be represented as necessarily encompassing all economic costs incurred through October 2026.

The investigation should obtain additional records rather than invent a total.

Where complete information cannot be obtained, the limitation should be described.

D.63. Financial reconciliation methodology

A complete reconciliation should use the Church Commissioners' accounting periods.

It should identify all Project Spire-related expenditure categories.

It should reconcile reported expenditure against the annual financial statements where possible.

It should distinguish accounts-payable amounts, actual payments and accrued costs.

It should also separate commitments from completed transactions.

The resulting schedule should be reviewed for omitted categories and duplicate entries.

D.64. Currency and valuation

Financial records may include historical values, contemporary sterling, investment valuations and transactions denominated in other currencies.

These should not be combined without stating the conversion method and valuation date.

A historical monetary comparison is not a present-day transaction.

An investment valuation is not a cash receipt.

A foreign-currency grant should be recorded using the original currency and the relevant accounting conversion.

The purpose is accurate financial measurement.

PART X — SAFEGUARDS AND ACCOUNTABILITY

D.65. Safeguards against anti-Black racism and Institutional Racism

RNL seeks evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism within financial administration.

Relevant activities include procurement, consultancy appointments, investment management, grant-making and beneficiary selection.

The institution should explain what policies apply and how they operate.

The existence of a general equality statement may be relevant.

However, an effective safeguard should be capable of examination through actual procedures and review arrangements.

RNL makes no accusation that discrimination has occurred.

D.66. Conflicts of interest in financial decisions

Professional participants may have affiliations with external organisations.

Such affiliations are not automatically improper.

However, if an organisation seeks a contract, grant or investment, relevant decision-makers should comply with applicable conflict-of-interest requirements.

The investigation should establish those requirements.

It should also determine whether declarations or recusals were necessary in particular decisions.

No conflict should be declared improper without identifying the relevant facts and duties.

D.67. Independent audit

The programme should be subject to appropriate financial reporting and independent scrutiny.

However, an audit of the Church Commissioners' annual accounts does not necessarily establish the delivery of reparatory benefits by a separate fund.

The investigation should therefore determine the scope of each relevant audit.

It should distinguish financial-statement assurance from verification of social or reparatory outcomes.

D.68. Public financial transparency

The responsible institutions should publish sufficient information to explain the programme's use of resources.

This may include annual accounts, aggregate professional fees, material financial commitments, investment holdings and grants.

Lawful confidentiality and privacy requirements should be respected.

However, financial accountability should not depend entirely upon general statements unsupported by inspectable records.

D.69. Complaints and appeals

Affected organisations should have a clear route for challenging decisions where appropriate.

The investigation should establish whether grant applicants may obtain reasons for rejection.

It should also identify what independent review mechanisms are available.

The existence of a complaint does not establish that the original decision was discriminatory or otherwise improper.

The purpose is fair examination.

D.70. Financial opacity and conflict prevention

RNL maintains that transparency and professional organisation are essential foundations for peace.

Confusion about the movement of reparatory resources may generate misunderstanding.

This should be addressed through clear accounting and accessible communication.

The possibility of serious disputes escalating into intimidation or violence should be considered as a preventative issue.

No threat or violent conduct is attributed to any individual or organisation by this statement.

PART XI — FORMAL FINANCIAL DISCLOSURE QUESTIONS

D.71. Questions concerning expenditure

Question D.1: What is the complete Project Spire expenditure for each year from 2019 to the latest available reporting date?

Question D.2: How was the approximately £1 million figure calculated?

Question D.3: What costs were excluded?

Question D.4: What forensic accounting fees were paid?

Question D.5: What historical research fees were paid?

Question D.6: What legal and regulatory costs were incurred?

Question D.7: What consultation costs were incurred?

Question D.8: What communications costs were incurred?

Question D.9: What governance development costs were incurred?

Question D.10: What additional costs arose during 2025 and 2026?

D.72. Questions concerning professional payments

Question D.11: Which organisations received Project Spire-related contracts?

Question D.12: What were the contract values and periods?

Question D.13: What procurement procedures were used?

Question D.14: What payments were made to external advisers?

Question D.15: What financial arrangements supported Lambeth Palace Library research?

Question D.16: What arrangements supported the relevant research and engagement roles?

Question D.17: Did Black History Studies receive any Project Spire-related payments?

Question D.18: Did Building Trust Consortium receive any such payments?

Question D.19: Did the GRH receive funding or sponsorship from Project Spire?

Question D.20: What documentary records support the answers?

D.73. Questions concerning capital and legal authority

Question D.21: Where is the original £100 million currently held?

Question D.22: What accounting designation applies?

Question D.23: Has any portion been transferred?

Question D.24: What legal authority supported each transfer?

Question D.25: Has a new charity been registered?

Question D.26: Has section 106 authorisation been obtained?

Question D.27: What conditions apply to any approval?

Question D.28: What amount remains untransferred?

Question D.29: Have any preparatory costs been deducted from the £100 million?

Question D.30: Can the Commissioners supply a complete reconciliation?

D.74. Questions concerning investments

Question D.31: What investment policies have been approved?

Question D.32: What investments have actually been completed?

Question D.33: What amounts were invested?

Question D.34: What entities received the investments?

Question D.35: What investment instruments were used?

Question D.36: What management fees have been paid?

Question D.37: What returns or losses have been recorded?

Question D.38: How is reparatory impact evaluated?

Question D.39: Who independently reviews investment performance?

Question D.40: What results have been verified?

D.75. Questions concerning grants and beneficiaries

Question D.41: Have any grants been formally approved?

Question D.42: Have any grants actually been paid?

Question D.43: Who received the payments?

Question D.44: What were the amounts and purposes?

Question D.45: What evidence confirms receipt?

Question D.46: What conditions governed the grants?

Question D.47: What outcomes have been reported?

Question D.48: What outcomes have been independently verified?

Question D.49: What support is available to smaller grassroots organisations?

Question D.50: What procedures permit applicants to challenge decisions?

D.76. Questions concerning safeguards

Question D.51: What financial safeguards exist against possible anti-Black racism and Institutional Racism?

Question D.52: How are procurement decisions protected against racial bias?

Question D.53: How are conflicts of interest identified?

Question D.54: What procedures apply to overlapping professional affiliations?

Question D.55: Who investigates complaints concerning financial discrimination?

Question D.56: What independent review procedures exist?

Question D.57: What measures protect complainants against victimisation?

Question D.58: What financial information is published routinely?

Question D.59: How are errors and inaccurate financial statements corrected?

Question D.60: Will the Commissioners provide a complete written financial-accountability and safeguards statement?

PART XII — CONTINUING MONITORING

D.77. Regulatory monitoring

RNL should check for registration of the proposed charity and relevant regulatory authorisation.

Any development should be dated and supported by an authoritative source.

A change in regulatory status should be added to the register without overwriting the previous position.

D.78. Financial monitoring

RNL should examine subsequent annual accounts and programme financial disclosures.

The investigation should identify any new expenditure figures, capital transfers, investments or grants.

Each new financial amount should be classified correctly.

D.79. Investment monitoring

Once investments exist, the register should record their value, financial structure and subsequent performance.

Investment valuations should be distinguished from realised cash flows.

D.80. Grant monitoring

Once grants exist, the register should follow them from approval through payment and receipt.

The existence of a grant programme should not be treated as proof of completed grants.

D.81. Outcome monitoring

Verified outcomes should be recorded separately from financial transactions.

The investigation should identify who performed the verification and what evidence was used.

D.82. Corrections

Where a financial figure is corrected, the original statement and revised amount should remain traceable.

The reason for the correction should be recorded.

This is particularly important where public disputes concern spending or fund size.

PART XIII — CORE FINANCIAL SOURCES

D.83. Original commitment

D-SRC-001 — Church Commissioners, 10 January 2023

https://www.churchofengland.org/media/finance-news/church-commissioners-publishes-full-report-historic-links-transatlantic-chattel-slavery-and

Evidence: Original £100 million commitment and proposed programme.

D.84. Project Spire expenditure

D-SRC-002 — UK Parliament, Question 65336

https://questions-statements.parliament.uk/written-questions/detail/2025-07-07/65336

Evidence: Approximately £1 million expenditure through December 2024 and staff-time exclusion.

D.85. Disputed spending claim

D-SRC-003 — UK Parliament, Question 63009

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63009

Evidence: Commissioners' rejection of the £5 million expenditure claim.

D.86. General-fund status and spending forecast

D-SRC-004 — UK Parliament, Question 69330

https://questions-statements.parliament.uk/written-questions/detail/2025-07-21/69330/

Evidence: Disputed forecast, £100 million commitment and general-fund status in September 2025.

D.87. Funding source

D-SRC-005 — UK Parliament, Question 63010

https://questions-statements.parliament.uk/written-questions/detail/2025-06-26/63010

Evidence: Proposed source of funds and regulatory-authorisation requirement.

D.88. Endowment financial statements

D-SRC-006 — Church Commissioners' annual publications

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/publications

Evidence: Published annual financial statements and historical financial figures.

D.89. Endowment valuation at December 2025

D-SRC-007 — Church Commissioners, 25 May 2026

https://www.churchofengland.org/media/finance-news/church-commissioners-england-endowment-fund-delivers-8-return-2025

Evidence: £11.6 billion endowment and 8% return for 2025.

D.90. Proposed fund model and regulatory position

D-SRC-008 — Church Commissioners' FAQs

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/frequently-asked-questions

Evidence: Distinction between compensation and investment, £1 billion ambition and proposed regulatory process.

D.91. Current operational status

D-SRC-009 — Church Commissioners' feedback and status page

https://www.churchofengland.org/about/governance/national-church-institutions/church-commissioners-england/who-we-are/historic-links-enslavement/tell-us-what-you-think

Evidence: Fund described as not yet operational.

D.92. Oversight Group financial recommendations

D-SRC-010 — Oversight Group Report

https://hrjfund.org/wp-content/uploads/2024/02/6630_Oversight-group-report_ONLINE_FINAL.pdf

Evidence: Fund scale, investment, grant-making and administrative-cost recommendations.

D.93. Charity Commission register

D-SRC-011 — Register of Charities

https://register-of-charities.charitycommission.gov.uk/

Evidence: Future verification of any registered fund, governing documents and financial accounts.

PART XIV — FINAL FINANCIAL ASSESSMENT

D.94. Financial facts established

The Church Commissioners announced a £100 million commitment in January 2023.

The independent Oversight Group recommended expansion towards £1 billion or more.

The Commissioners maintained that their own commitment remained £100 million.

They reported approximately £1 million in preparatory expenditure from 2019 through December 2024, excluding internal staff time.

They rejected claims concerning £5 million of past expenditure and an alleged £5 million forecast for 2026–28.

In September 2025, they stated that the £100 million remained in their general fund pending regulatory authorisation.

Their later official information continues to describe the proposed fund as not operational.

These statements form the principal documented financial foundation.

D.95. Financial matters not established

The investigation has not obtained a complete expenditure reconciliation through October 2026.

It has not independently established the precise total of all Project Spire professional fees.

It has not established that the GRH received Project Spire funding.

It has not obtained a complete schedule of transfers, investments, grants or verified beneficiary receipt.

These limitations must remain visible.

No missing amount should be assumed to be zero.

Nor should it be replaced with an unsupported estimate.

D.96. The risk of confusing investment with compensation

The proposed fund's investment-led model should be distinguished from direct compensation.

This distinction does not determine whether the programme is adequate or inadequate.

It defines the type of financial activity proposed.

A responsible assessment of reparatory delivery must therefore examine who receives benefits, in what form and over what period.

An investment vehicle may hold substantial assets while comparatively little value has reached final beneficiaries.

Equally, investments may generate long-term benefits that cannot be assessed through immediate grant totals alone.

The evaluation must reflect the programme's actual design.

D.97. The importance of community oversight

Affected communities should have access to accurate information concerning financial decisions.

The investigation should establish whether the proposed governance arrangements permit independent Black/Afrikan participation in relevant financial oversight.

It should also examine whether smaller grassroots organisations can seek funding through fair procedures.

The aim is not to presume that every community organisation should receive money.

It is to establish transparent and accountable decision-making.

D.98. The importance of preventative safeguards

Financial administration should be protected against fraud, error, conflicts of interest and possible discriminatory practices.

RNL's concern includes the possibility of anti-Black racism and Institutional Racism affecting procurement, consultation and beneficiary selection.

The responsible institution should provide evidence of its safeguards.

The existence of financial controls is relevant.

However, the effectiveness of those controls should also be capable of independent examination.

D.99. Final conclusion

Project Spire's financial investigation has established an original £100 million commitment and a documented history of preparatory expenditure.

It has also identified the proposed investment-led nature of the response and the requirement for regulatory authorisation.

However, the financial records examined do not establish completed delivery of the £100 million to affected communities.

Nor do they provide a complete account of subsequent expenditure, professional contracts, investment transactions or reparatory outcomes.

The investigation therefore requires a current and independently reviewable money trail.

The central conclusion of Appendix D is that Project Spire's financial promises and historical preparatory expenditure are documented, but the actual movement of capital, investments, grants, beneficiary receipts and verified reparatory benefits must be established separately through transaction-level evidence.

RNL will continue to distinguish the announcement of reparations from their practical delivery.

It seeks lawful financial administration, professional accountability, meaningful community oversight, effective safeguards and peaceful reparatory justice.

APPENDIX D — STATUS CERTIFICATION

Appendix: D of F
Title: Financial Accountability and Reparatory Delivery Register
Prepared: 18 October 2026
Document status: Consolidated draft completed
Original Commissioners commitment: £100 million documented
Oversight Group expansion ambition: £1 billion-plus documented as an ambition
Preparatory expenditure 2019–2024: Approximately £1 million officially reported
Complete expenditure through October 2026: Outstanding
Current regulatory authorisation: Requires continuing verification
Completed investments and grants: Not independently established through records examined
Verified reparatory beneficiary receipt: Not established through records examined
Formal Project Spire–GRH financial relationship: Not established
Findings of financial wrongdoing: None made
Continuing financial monitoring: Required

Prepared for and on behalf of Reparation Nation Limited

Derrick Emmanuel Lynch
Also known as John Canoe
Company Number: 14761041

The formal signature and authorisation page will appear once, after Appendix F.

END OF APPENDIX D OF F — FINANCIAL ACCOUNTABILITY AND REPARATORY DELIVERY REGISTER

NEXT: APPENDIX E OF F — OUTSTANDING QUESTIONS, INSTITUTIONAL DISCLOSURE REQUESTS, CORRESPONDENCE REGISTER, RESPONSIBILITY MATRIX, RESPONSE DEADLINES AND CONSOLIDATED ACTION PLAN.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

APPENDIX E OF F

OUTSTANDING QUESTIONS, INSTITUTIONAL DISCLOSURE REQUESTS, CORRESPONDENCE REGISTER, RESPONSIBILITY MATRIX, RESPONSE DEADLINES AND CONSOLIDATED ACTION PLAN

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
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PART I — PURPOSE, AUTHORITY AND INVESTIGATIVE CONTINUITY

E.1. Purpose of this appendix

This appendix establishes the operational framework for continuing Reparation Nation Limited's independent investigation into Project Spire following completion of the initial 24 substantive sections.

The report has identified the Church Commissioners for England's historical financial connections with African chattel enslavement, their original £100 million commitment, the proposed Fund for Healing, Repair and Justice, the independent Oversight Group, professional research and engagement activities, and relevant legal and regulatory processes.

It has also identified material outstanding questions concerning institutional responsibility, professional appointments, financial expenditure, community participation, regulatory authorisation, safeguards and reparatory delivery.

Those questions must now be organised into a formal disclosure programme.

The purpose of this appendix is to specify which institution should receive each enquiry, what documents should be requested, how correspondence should be recorded, how replies should be evaluated and what action should follow.

This appendix is intended to prevent the investigation from becoming trapped in repeated, fragmented correspondence.

E.2. The relationship with the substantive investigation

The 24 substantive sections provide the analytical foundation.

Appendix A identifies the principal evidence.

Appendix B establishes the chronology.

Appendix C identifies the relevant institutions, organisations and persons.

Appendix D distinguishes financial commitments, expenditure, transactions and verified reparatory delivery.

Appendix E converts those findings into requests for evidence and a practical programme of institutional accountability.

It does not replace the earlier detailed questions.

Instead, it consolidates and prioritises them so that responsible institutions can provide manageable, properly attributed responses.

E.3. The central operational objective

The central objective is to obtain reliable documentary answers to the material questions that remain unresolved.

The investigation must establish what legal and financial authority currently exists.

It must establish how Project Spire's expenditure has been recorded.

It must clarify who controls relevant decisions and whether formal financial relationships exist with external organisations.

It must examine the arrangements for Black/Afrikan community involvement.

It must also seek evidence of safeguards against the possibility of anti-Black racism, racial bias and Institutional Racism within the programme's decision-making processes.

These enquiries should be pursued in writing wherever practicable.

E.4. RNL's formal position

The following declaration remains applicable:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

These statements are central to the investigation.

The request for safeguards concerns the possibility of discrimination and the evidence required to assess preventative protection.

It must not be rewritten as an accusation that wrongdoing has already occurred.

The investigation must also preserve uncertainty concerning institutional relationships, contracts and financial transactions until sufficient evidence becomes available.

E.5. The distinction between questions and findings

An investigative question identifies information that requires clarification.

It does not establish the answer.

For example, asking whether Project Spire financed the Global Reparations Hub does not establish that such financing occurred.

Asking whether a professional appointment required a conflict declaration does not establish that the person breached a duty.

Asking whether the Commissioners possess effective safeguards against Institutional Racism does not assert that racism occurred.

The correspondence register must preserve these distinctions.

E.6. Institutional responsibility must be established

Questions should be directed to the institutions most likely to possess the relevant records.

The Church Commissioners should address their own decisions, expenditure and programme-development arrangements.

The Charity Commission should address matters within its statutory regulatory responsibilities.

Lambeth Palace Library should address relevant archival activities and institutional employment or commissioning records within its responsibility.

External organisations should be invited to clarify their own documented activities.

RNL should not assume that one institution can authoritatively answer every question concerning another.

PART II — DISCLOSURE PRIORITIES

E.7. Priority One: current legal and operational status

The first priority is to establish the current legal and operational status of Project Spire and the proposed Fund for Healing, Repair and Justice.

The Commissioners' official information examined in the initial report describes the fund as not yet operational.

However, that statement must be treated as a dated position.

The next enquiry should establish whether any subsequent applications, approvals, registrations or transfers have occurred.

The response should identify the relevant dates, decision-makers and documentary records.

E.8. Priority Two: the £100 million money trail

The second priority is to obtain a complete financial reconciliation.

The original £100 million commitment must be distinguished from preparatory expenditure.

The Commissioners' previously reported approximately £1 million in Project Spire-related expenditure through December 2024 should be reconciled with later costs.

The response should identify any allocations, completed transfers, investments, grants and verified beneficiary receipts.

A financial promise must not be counted as a completed reparatory payment.

E.9. Priority Three: governance and delegated authority

The third priority is to establish who controls the programme.

The Commissioners should identify the current Board responsibilities, relevant committees, implementation workstreams and any separately appointed fund trustees.

The response should distinguish advisory responsibilities from legal authority.

It should identify who may approve expenditure, enter contracts, appoint trustees, authorise investments and award grants.

E.10. Priority Four: safeguards against anti-Black racism and Institutional Racism

The fourth priority is to obtain specific documentary evidence of safeguards.

RNL seeks recognition of the possibility of anti-Black racism, racial bias and Institutional Racism within contemporary institutional decision-making.

The responsible institutions should identify relevant policies, responsible officers, independent scrutiny, complaints procedures, risk assessments and evidence of implementation.

The existence of general institutional commitments should not automatically be treated as evidence that every Project Spire procedure is adequately protected.

E.11. Priority Five: professional appointments

The fifth priority concerns the contractual and institutional arrangements supporting Project Spire-related work.

The enquiry should distinguish employees, researchers, consultants, advisers, archivists and volunteers.

It should seek clarification concerning the documented roles of Charmaine Simpson, Kwesi Ochosi and other relevant professionals.

It should not assume that their roles included financial authority over the proposed fund.

E.12. Priority Six: external organisational relationships

The sixth priority concerns possible formal relationships with external reparations organisations.

The investigation has identified overlapping professional participation involving Project Spire-related personnel and the Global Reparations Hub.

However, common governance or financing has not been established.

The enquiry should therefore request confirmation of whether any formal contracts, grants, sponsorships or institutional agreements exist.

A clear negative response supported by appropriate records is itself relevant evidence.

E.13. Priority Seven: consultation and community participation

The seventh priority is to establish the reach and influence of consultation.

The Oversight Group reported substantial engagement in 2023.

However, the investigation should clarify how participants and organisations were identified, how views were recorded and what opportunities remain for independent grassroots groups.

Consultation must remain distinct from representation, consent, trusteeship and ownership.

E.14. Priority Eight: verified reparatory delivery

The eighth priority is to examine the eventual practical benefits of the proposed programme.

Where investments or grants have occurred, the investigation should seek evidence of amounts, recipients, financial terms and outcomes.

Where they have not occurred, the responsible institution should be invited to confirm the position.

The objective is to distinguish promises from verified delivery.

PART III — RESPONSIBILITY MATRIX

E.15. Primary institutional responsibility table

Institution	Main enquiries	Responsibility status
Church Commissioners for England	Original commitment, historical research, expenditure, governance, contracts, implementation, safeguards	Primary institutional respondent
Charity Commission for England and Wales	Registration, statutory authorisations and relevant regulatory decisions	Regulator within its legal jurisdiction
Lambeth Palace Library	Archival programme, research appointments, source access and related records	Relevant archival custodian
Fund for Healing, Repair and Justice, if legally established	Trustees, assets, investments, grants, accounts and complaints	Future or current responsibility to be verified
Original Oversight Group or authorised record custodian	Recommendations, consultation and advisory work	Documentary and advisory responsibility
Grant Thornton UK LLP	Forensic accounting scope and published research	Professional source, subject to contractual restrictions
Relevant academic institutions	Research participation and any institutional commissions	Responsibility requires verification
Black History Studies	Its own possible contractual relationship, if any	Direct clarification where justified

Building Trust Consortium	Its own legal identity and possible contractual relationship, if any	Direct clarification where justified
GRH organisers	Any formal relationship with Project Spire	Cross-reference only; separate investigation preserved
Reparation Nation Limited	Evidence preservation, analysis, correspondence and corrections	Independent investigator

This table allocates investigative enquiries.

It does not establish that every listed organisation possesses records or responsibilities beyond those supported by evidence.

E.16. The Church Commissioners' principal response

The Church Commissioners should receive the first consolidated institutional enquiry.

The request should be organised into clearly identified subjects.

It should not rely on a large unstructured list of questions without explaining the action required.

A covering communication should identify the report, its independent nature and the principal unresolved matters.

The detailed question schedule may be attached separately.

E.17. The Charity Commission's response

The Charity Commission should receive questions concerning the proposed registration of the fund and relevant regulatory authorisations.

The request should seek current status and public records.

It should not demand that the regulator make factual findings concerning unrelated professional or community matters outside its jurisdiction.

E.18. Lambeth Palace Library's response

The Library should be asked about the Project Spire archival research programme and relevant professional roles.

The enquiry should identify the specific primary publications supporting the request.

The Library should not be presumed to control the Commissioners' proposed financial fund.

E.19. External organisations' responses

Where formal relationships require clarification, the relevant external organisations may be approached separately.

Each should be asked only about its own activities and any actual relationship with Project Spire.

The enquiry should not describe an unverified contract or financial transfer as established.

E.20. The independence of the GRH investigation

The GRH investigation retains its own correspondence, evidence and action registers.

Project Spire enquiries should address only the possible formal connections supported by documented professional overlap.

This restriction prevents unnecessary confusion.

It also ensures that questions about the GRH's own governance are not incorrectly assigned to the Church Commissioners.

PART IV — MASTER DOCUMENTARY DISCLOSURE SCHEDULE

E.21. Historical research documents

Disclosure ID: SPIRE-E-DOC-001

Requested from: Church Commissioners and relevant archival custodians.

Records sought: Original terms of reference, research reports, underlying source references, relevant commissioning records and available independent reviews.

Purpose: Permit independent examination of the historical basis for Project Spire.

Status: Some publications available; complete supporting record not yet assembled.

E.22. Original £100 million decision

Disclosure ID: SPIRE-E-DOC-002

Requested from: Church Commissioners.

Records sought: Board resolution, decision memorandum, relevant financial rationale and approved terms of the commitment.

Purpose: Establish the precise institutional decision and basis for the amount.

Status: Public announcement documented; complete underlying decision record outstanding.

E.23. Financial expenditure 2019–2024

Disclosure ID: SPIRE-E-DOC-003

Requested from: Church Commissioners.

Records sought: Breakdown of the approximately £1 million reported expenditure, including relevant categories and accounting exclusions.

Purpose: Reconcile the public aggregate figure.

Status: Aggregate figure documented; detailed reconciliation outstanding.

E.24. Financial expenditure during 2025

Disclosure ID: SPIRE-E-DOC-004

Requested from: Church Commissioners.

Records sought: Actual Project Spire costs during 2025, including professional services, administration and governance.

Purpose: Extend the financial record beyond December 2024.

Status: Outstanding.

E.25. Financial expenditure during 2026

Disclosure ID: SPIRE-E-DOC-005

Requested from: Church Commissioners.

Records sought: Latest available actual and accrued expenditure for 2026, with the reporting cut-off clearly stated.

Purpose: Establish the contemporary preparatory-cost position.

Status: Outstanding.

E.26. Current £100 million capital position

Disclosure ID: SPIRE-E-DOC-006

Requested from: Church Commissioners.

Records sought: Current accounting designation, legal holder, approved transfers and remaining balance.

Purpose: Distinguish commitment from actual deployment.

Status: September 2025 position documented; current reconciliation outstanding.

E.27. Regulatory application records

Disclosure ID: SPIRE-E-DOC-007

Requested from: Church Commissioners and Charity Commission.

Records sought: Registration application, section 106 application, correspondence or public decision records where disclosable.

Purpose: Establish legal and regulatory status.

Status: Current authoritative confirmation required.

E.28. Governance and delegation records

Disclosure ID: SPIRE-E-DOC-008

Requested from: Church Commissioners and any established fund.

Records sought: Governing documents, terms of reference, committee structures, trustee appointments and delegated-authority schedules.

Purpose: Establish actual decision-making powers.

Status: Partially documented; full current arrangements outstanding.

E.29. Oversight Group records

Disclosure ID: SPIRE-E-DOC-009

Requested from: Church Commissioners or authorised custodian.

Records sought: Original terms, membership changes, recommendations, response and current status.

Purpose: Distinguish advisory recommendations from implemented governance.

Status: Principal publications available; some implementation details outstanding.

E.30. Consultation records

Disclosure ID: SPIRE-E-DOC-010

Requested from: Church Commissioners or authorised custodian.

Records sought: Methodology, anonymised participation analysis, organisational engagement information, survey analysis and subsequent consultation updates.

Purpose: Examine the reach, influence and limitations of community engagement.

Status: Published materials available; further methodological evidence required.

E.31. Professional appointments

Disclosure ID: SPIRE-E-DOC-011

Requested from: Church Commissioners, Lambeth Palace Library and relevant commissioning bodies.

Records sought: General appointment terms, responsibilities, periods, contracting institutions, financial authority and relevant publicly disclosable costs.

Purpose: Clarify institutional roles and financial accountability.

Status: Certain roles documented; contractual detail outstanding.

E.32. Procurement and conflicts records

Disclosure ID: SPIRE-E-DOC-012

Requested from: Church Commissioners and relevant institutions.

Records sought: Procurement policies, conflicts-of-interest policies, decision-specific procedures and appropriate records demonstrating their operation.

Purpose: Establish safeguards governing professional and financial decisions.

Status: Further verification required.

E.33. External organisational relationships

Disclosure ID: SPIRE-E-DOC-013

Requested from: Church Commissioners and any relevant external organisations.

Records sought: Any contracts, grants, sponsorships, formal partnerships or written confirmation that no such relationships exist.

Purpose: Determine whether Project Spire possessed formal relationships with the GRH, Black History Studies or Building Trust Consortium.

Status: Not established through evidence examined.

E.34. Anti-racism safeguards

Disclosure ID: SPIRE-E-DOC-014

Requested from: Church Commissioners and any established fund.

Records sought: Equality and anti-racism policies, Institutional Racism risk assessments, complaints procedures, review mechanisms and implementation evidence.

Purpose: Examine safeguards against possible anti-Black racism, racial bias and Institutional Racism.

Status: Wider Church framework documented; project-specific operational evidence outstanding.

E.35. Financial transfer and investment records

Disclosure ID: SPIRE-E-DOC-015

Requested from: Church Commissioners and appropriate asset holders.

Records sought: Transfers, investment approvals, investment registers, financial instruments, management fees and reported returns.

Purpose: Establish the actual movement and treatment of capital.

Status: Complete transaction-level record not obtained.

E.36. Grants and beneficiary outcomes

Disclosure ID: SPIRE-E-DOC-016

Requested from: Any operating fund or responsible grant-making institution.

Records sought: Grant awards, disbursement records, verified receipts and independently assessed outcomes.

Purpose: Identify reparatory value actually received.

Status: Complete verified delivery record not established.

PART V — CONSOLIDATED INSTITUTIONAL QUESTIONS

E.37. Questions concerning legal authority

Question E.1: What is the current legal status of the proposed Fund for Healing, Repair and Justice?

Question E.2: Has an application to register the proposed charity been submitted?

Question E.3: Has any relevant application under section 106 of the Charities Act 2011 been submitted?

Question E.4: Has authorisation been granted, refused or otherwise determined?

Question E.5: What conditions apply to any authorisation?

Question E.6: What institution presently holds the original £100 million commitment?

Question E.7: Has any portion been transferred?

Question E.8: What records establish the current financial and regulatory position?

Question E.9: What legal or administrative steps remain outstanding?

Question E.10: What is the current implementation timetable?

E.38. Questions concerning expenditure

Question E.11: What amount has been spent on Project Spire since 2019?

Question E.12: What were the annual totals?

Question E.13: What categories were included in the approximately £1 million expenditure reported through December 2024?

Question E.14: What costs were excluded?

Question E.15: What forensic accounting fees were paid?

Question E.16: What academic and archival research costs were incurred?

Question E.17: What governance and legal costs were incurred?

Question E.18: What consultation and communications costs were incurred?

Question E.19: What additional expenditure arose during 2025 and 2026?

Question E.20: Will the Commissioners provide an independently reconcilable financial schedule?

E.39. Questions concerning governance

Question E.21: Who currently possesses authority over Project Spire decisions?

Question E.22: What Board or committee decisions authorised the programme?

Question E.23: What delegated powers apply to professional personnel?

Question E.24: What is the current status of the original Oversight Group?

Question E.25: What governing arrangements are proposed for the separate fund?

Question E.26: How will trustees be selected?

Question E.27: What financial powers will trustees possess?

Question E.28: What powers will affected Black/Afrikan communities possess?

Question E.29: What independent review arrangements exist?

Question E.30: Will the institution publish an updated governance and responsibility chart?

E.40. Questions concerning personnel

Question E.31: What was the precise Project Spire-related role of Charmaine Simpson?

Question E.32: Which institution authorised that role?

Question E.33: What responsibilities and reporting arrangements applied?

Question E.34: What was Kwesi Ochosi's precise Project Spire archival appointment?

Question E.35: Which institution financed or supervised that appointment?

Question E.36: Did either role include authority over investment, grant-making or the original £100 million commitment?

Question E.37: What procedures applied to external professional affiliations?

Question E.38: Were any relevant contractual relationships maintained through Black History Studies?

Question E.39: Were any relevant contractual relationships maintained through Building Trust Consortium?

Question E.40: What documents can be provided to establish the actual institutional boundaries?

E.41. Questions concerning the GRH relationship

Question E.41: Did the Church Commissioners possess any formal role in establishing the Global Reparations Hub?

Question E.42: Did Project Spire finance or sponsor the GRH?

Question E.43: Was any Project Spire budget used for the GRH launch of 17 October 2026?

Question E.44: Was any formal agreement made between the Commissioners and the GRH?

Question E.45: Did any Project Spire professional participate in the launch under formal Church Commissioners authority?

Question E.46: If so, what was the scope of that authority?

Question E.47: If not, can the Commissioners confirm the institutional separation?

Question E.48: Were any relevant conflicts of interest identified?

Question E.49: What safeguards applied to any such relationships?

Question E.50: What documentary evidence supports the answers?

These questions do not presume that a financial or governance relationship existed.

E.42. Questions concerning consultation

Question E.51: What methodology was used in the 2023 consultation?

Question E.52: Does the reported figure of 1,106 represent unique individuals?

Question E.53: How were organisations selected or invited?

Question E.54: Which geographical regions were included?

Question E.55: How were dissenting views recorded?

Question E.56: What continuing consultation has taken place?

Question E.57: How are independent grassroots organisations able to participate?

Question E.58: What does the programme mean by Black community leadership and ownership?

Question E.59: How are community representatives made accountable?

Question E.60: Can non-participating organisations request future involvement without being required to endorse the programme?

E.43. Questions concerning safeguards

Question E.61: Do the responsible institutions acknowledge the possibility of anti-Black racism, racial bias and Institutional Racism in their decision-making processes?

Question E.62: What safeguards exist to prevent those risks?

Question E.63: What project-specific risk assessments have been undertaken?

Question E.64: What safeguards apply to professional appointments?

Question E.65: What safeguards apply to consultation?

Question E.66: What safeguards apply to investment decisions?

Question E.67: What safeguards apply to grant-making and beneficiary eligibility?

Question E.68: Who independently evaluates the operation of those safeguards?

Question E.69: What complaints, appeals and protections against victimisation exist?

Question E.70: Will a complete written safeguards statement be provided?

E.44. Questions concerning reparatory delivery

Question E.71: What investments have actually been completed?

Question E.72: What amounts were invested?

Question E.73: Who owns the resulting assets?

Question E.74: What grants have actually been approved?

Question E.75: What grants have actually been paid?

Question E.76: What evidence confirms receipt?

Question E.77: What reparatory outcomes have been verified?

Question E.78: What independent audit or evaluation exists?

Question E.79: How are failures and losses reported?

Question E.80: How will the public distinguish projected benefit from delivered benefit?

PART VI — CORRESPONDENCE PROCEDURES

E.45. The initial formal approach

The first formal communication should be addressed to the Church Commissioners.

It should identify Reparation Nation Limited and the Project Spire investigation.

It should state that the initial documentary phase has been completed as a draft.

It should explain that the purpose of the communication is to obtain written clarification and supporting evidence.

The communication should distinguish material questions from accusations.

It should identify the relevant attached schedules.

The recipient should be invited to correct inaccuracies.

E.46. The need for one principal correspondence thread

To prevent confusion, RNL should maintain one principal Project Spire institutional correspondence thread with the Church Commissioners where practicable.

Further enquiries may be grouped by subject.

However, they should refer to the same investigation reference and preserve previous answers.

Separate institutions should receive appropriately targeted communications.

The separate GRH and Black Cultural Centre correspondence should not be automatically copied into Project Spire communications.

E.47. The importance of accurate recipient information

Recipient names and addresses should be verified before correspondence is issued.

An email address should not be included merely because it resembles an institutional address.

Where an address is unavailable, the official published contact mechanism should be used.

The correspondence register should record the route actually used.

A failed delivery should be identified as a failed delivery, not as an institutional refusal.

E.48. The acknowledgement stage

A communication may receive an automatic acknowledgement.

The register should record that acknowledgement separately from a substantive answer.

It should also preserve any case or reference number supplied.

An automatic reply should not be marked as a completed response to the investigation.

E.49. The substantive response stage

A substantive response should address the relevant questions.

The register should identify which matters have been answered.

Where a response provides a document, that document should be entered into Appendix A's evidence system.

Where the response corrects the chronology, Appendix B should be updated.

Where it clarifies a professional relationship, Appendix C should be updated.

Where it supplies financial records, Appendix D should be updated.

E.50. The partial response stage

An institution may answer some questions while leaving others outstanding.

The response should therefore be marked *partially answered*.

The follow-up should identify the unanswered questions by reference.

It should not unnecessarily repeat matters already resolved.

This prevents correspondence overload and maintains clarity.

E.51. The refusal stage

A respondent may decline to disclose particular material.

The investigation should preserve the reason supplied.

Where legal privilege, confidentiality or data protection is invoked, the relevant explanation should be considered.

RNL may then examine whether a redacted document, aggregate figure or alternative record is available.

A refusal does not automatically establish concealment or wrongdoing.

E.52. The referral stage

An institution may identify another organisation as the appropriate holder of a record.

The referral should be documented.

The relevant question should then be redirected where appropriate.

A referral does not necessarily constitute a substantive answer.

However, it may assist in identifying responsibility.

E.53. The correction stage

If an institution supplies evidence correcting an earlier statement, the original and revised entries should be preserved.

The correction should be dated.

The supporting record should be identified.

The investigation should not silently remove the original statement.

E.54. The closure stage

An individual question should be marked closed only when it has received a sufficiently supported answer or an appropriately documented final evidential limitation.

Closing one question does not close the wider investigation.

Where circumstances subsequently change, the question may be reopened with an explanation.

PART VII — RESPONSE DEADLINES AND FOLLOW-UP RULES

E.55. The Commissioners' published response aim

The Church Commissioners' public enquiry page states an aim to respond within 30 working days.

This should be considered when planning correspondence.

However, the published statement is an institutional service aim and must not automatically be described as a statutory deadline applying to every category of request.

The response period should be calculated from the appropriate date according to the institution's stated practice.

The investigation should record the actual submission date before calculating follow-up dates.

E.56. Proposed acknowledgement request

RNL may ask a recipient to acknowledge receipt promptly.

A proposed acknowledgement period of five working days may assist with administration.

However, this should be described as **RNL's requested timetable**, not an existing legal obligation unless an applicable rule establishes one.

The request should remain proportionate.

E.57. Proposed substantive response period

RNL may invite institutions to provide a substantive response within 30 working days.

This aligns with the Commissioners' published response aim.

However, complex requests may require additional time.

A respondent should be invited to explain any necessary extension and identify when the remaining information may be supplied.

E.58. Proposed first follow-up

If no substantive response is received by the expected date, RNL should review the correspondence record before sending a follow-up.

The follow-up should confirm the original delivery and identify the unanswered questions.

It should request an updated timetable.

It should avoid treating silence as proof of misconduct.

E.59. Proposed escalation

Where material enquiries remain unanswered after reasonable follow-up, RNL may seek review by the appropriate senior institutional contact or authorised complaints procedure.

The escalation should identify the specific administrative problem.

It should distinguish inadequate communication from proven discriminatory or financial wrongdoing.

E.60. Statutory deadlines

Where a particular request engages an applicable statutory information right, the relevant legal timetable should be identified separately.

RNL should not presume that the Freedom of Information Act applies to every Church-related institution.

The legal status of the respondent and the relevant request must first be established.

E.61. Deadline register

Stage	Proposed time frame	Status
Initial formal enquiry	Date to be recorded when sent	Not yet issued
Acknowledgement requested	Five working days	Proposed RNL request
Substantive response requested	Within 30 working days	Proposed; subject to applicable institutional arrangements
Interim response where needed	Before or around substantive response target	To be agreed
First follow-up	After missed response target and delivery check	Conditional
Senior review or escalation	Following reasonable unresolved follow-up	Conditional
Final evidential assessment	After responses and verification	Not yet scheduled

No actual deadline should be entered until the communication is issued.

PART VIII — PERMANENT CORRESPONDENCE REGISTER

E.62. Correspondence record fields

Each communication should be recorded using the following structure.

Field	Required entry
Correspondence ID	Unique RNL reference

Project	Project Spire
Institution	Recipient organisation
Contact	Verified recipient or official contact route
Subject	Precise purpose
Date sent	Actual date
Method	Email, web form, post or other
Delivery evidence	Sent record, acknowledgement or tracking
Questions included	E-question or section references
Documents requested	Disclosure IDs
Response target	Applicable or requested date
Response received	Actual date
Response status	Complete, partial, declined, referred, unanswered
Evidence received	Document IDs
Follow-up required	Yes or no, with reason
Closure status	Open or closed

E.63. Initial correspondence entries

Correspondence ID	Intended respondent	Purpose	Status
SPIRE-E-COR-001	Church Commissioners	Principal consolidated institutional enquiry	Drafting required
SPIRE-E-COR-002	Charity Commission	Current registration and regulatory-authorisation status	Drafting required
SPIRE-E-COR-003	Lambeth Palace Library	Archival programme and professional roles	Drafting required
SPIRE-E-COR-004	Church Commissioners	Detailed financial reconciliation	Drafting required

SPIRE-E-COR-005	Church Commissioners	Anti-racism and Institutional Racism safeguards	Drafting required
SPIRE-E-COR-006	Oversight Group records custodian	Consultation and advisory records	Drafting required
SPIRE-E-COR-007	Relevant external organisations	Formal relationship clarification, where justified	Conditional
SPIRE-E-COR-008	Relevant respondents	Formal right of reply and corrections	To follow documentary review

These entries are planned communications.

They do not represent emails already sent.

E.64. Response status codes

Code	Meaning
NS	Not sent
SENT	Sent, delivery not yet independently confirmed
ACK	Acknowledged
IP	Response in preparation, according to recipient
PART	Partially answered
FULL	Substantively answered
REF	Referred to another institution
DEC	Disclosure declined with explanation
NR	No response by recorded target date
FUP	Follow-up issued
COR	Correction supplied
CLOSED	Question closed following evidential review

The status must reflect the actual record.

For example, an automatic acknowledgement should not be entered as FULL.

PART IX — DOCUMENT PRESERVATION AND EVIDENTIAL INTEGRITY

E.65. Preservation of original communications

RNL should preserve original correspondence wherever possible.

Email headers, message bodies, attachments and dates may be relevant.

A screenshot may assist but should not replace a complete original message where the latter is available.

The purpose is to preserve the exact communication.

E.66. Preservation of the original question

The wording of each question should remain intact.

Terms such as *possible*, *appears*, *suspect*, *reported*, *unverified* and *not established* should not be silently removed.

This is especially important where the question concerns racism, legal authority or financial conduct.

A respondent should not be represented as answering an allegation that RNL did not make.

E.67. Preservation of institutional responses

Responses should be recorded accurately.

Where the institution supplies a qualified answer, the qualification should remain visible.

Where it states that a record is unavailable, that should not be rewritten as confirmation that the record never existed.

Where it denies a financial relationship, the denial should be attributed to the responsible institution unless independently corroborated.

E.68. Preservation of sources

Each document received should be allocated an Appendix A evidence identifier.

The record should include the issuing institution, date, title, source and evidential status.

Where multiple versions exist, they should be distinguished.

E.69. Preservation of corrections

Corrections should identify what changed, why it changed and what evidence supports the revision.

The original material should remain traceable.

This is necessary for an accurate permanent investigation record.

E.70. Preservation of institutional boundaries

A document concerning the GRH should not automatically be treated as a Project Spire record.

Where it establishes relevant professional overlap, it may be cross-referenced.

Where it concerns the GRH's own finances, governance or communications, it should remain primarily within the separate investigation.

The same principle applies to the Black Cultural Centre enquiry.

PART X — CONSOLIDATED ACTION REGISTER

E.71. Immediate actions

Action ID	Action	Lead	Status
SPIRE-E-A01	Finalise principal Church Commissioners question schedule	RNL	Outstanding
SPIRE-E-A02	Verify institutional contact details	RNL	Outstanding
SPIRE-E-A03	Send principal formal enquiry	RNL	Not sent
SPIRE-E-A04	Request current regulatory status	RNL / Charity Commission	Not sent
SPIRE-E-A05	Request complete financial reconciliation	RNL / Church Commissioners	Not sent
SPIRE-E-A06	Request project-specific safeguards dossier	RNL / Church Commissioners	Not sent
SPIRE-E-A07	Request governance and delegation records	RNL / Church Commissioners	Not sent

SPIRE-E-A08	Request appointment-role clarification	RNL / relevant custodians	Not sent

E.72. Secondary actions

Action ID	Action	Lead	Status
SPIRE-E-A09	Obtain consultation methodology	RNL	Outstanding
SPIRE-E-A10	Clarify Oversight Group continuing status	RNL	Outstanding
SPIRE-E-A11	Clarify documented external affiliations	RNL	Outstanding
SPIRE-E-A12	Request confirmation of any GRH financial relationship	RNL	Outstanding
SPIRE-E-A13	Reconcile professional-fee information	RNL	Outstanding
SPIRE-E-A14	Examine relevant annual financial statements	RNL	Outstanding
SPIRE-E-A15	Confirm any completed investments	RNL	Conditional on fund status
SPIRE-E-A16	Confirm any completed grants and beneficiary receipts	RNL	Conditional on fund status

E.73. Continuing actions

Action ID	Action	Lead	Status
SPIRE-E-A17	Preserve all original source material	RNL	Continuing
SPIRE-E-A18	Update master chronology	RNL	Continuing
SPIRE-E-A19	Update persons and institutions register	RNL	Continuing
SPIRE-E-A20	Update financial register	RNL	Continuing
SPIRE-E-A21	Maintain correspondence and deadline register	RNL	To commence
SPIRE-E-A22	Record substantive institutional corrections	RNL	Continuing

SPIRE-E-A23 Offer appropriate rights of reply	RNL	Future action
SPIRE-E-A24 Monitor regulatory and financial changes	RNL	Future action
SPIRE-E-A25 Prepare revised findings based upon new evidence	RNL	Future stage

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PART XI — SAFEGUARDS AND CONFLICT PREVENTION

E.74. Fair treatment of respondents

RNL should address the relevant institutions and individuals professionally.

Requests should be specific and supported by existing evidence.

No respondent should be presumed guilty of wrongdoing because their name appears in the investigation.

The right of reply must remain genuine.

E.75. Fair treatment of affected communities

Independent Black/Afrikan organisations should have reasonable opportunities to submit information and raise questions.

A participant should not be required to endorse Project Spire in order to provide historical or community evidence.

Consultation should not automatically be treated as consent.

E.76. Safeguards against racial bias

RNL's enquiry concerning the possibility of anti-Black racism and Institutional Racism should remain explicit.

The investigation should ask the institution to identify its safeguards and evidence of their operation.

It should not substitute an unsupported allegation for that enquiry.

E.77. Preventing unnecessary conflict

RNL considers transparent records, timely responses and fair procedures essential foundations for peace.

Reparatory justice may involve substantial disagreement.

The possibility of intimidation, threats of violence or violence should be addressed through preventative and lawful arrangements.

This does not assert that any named individual or community has threatened violence.

The purpose is to reduce avoidable conflict.

E.78. Avoiding unnecessary repetition

Once a substantive question has been adequately answered, the response should be incorporated into the evidence register.

The question should not repeatedly be presented as unresolved merely to continue correspondence.

Where new evidence arises, the matter may be reopened with reasons.

The objective is investigative progress.

PART XII — FORMAL DISCLOSURE REQUEST FORMAT

E.79. Required elements of institutional correspondence

Every principal request should include:

- The name and company number of Reparation Nation Limited.
- The exact investigation title.
- The responsible institution and subject.
- A brief explanation of the documentary basis for the enquiry.
- Numbered questions and documentary requests.
- A clear distinction between concerns and findings.
- A request for written answers and supporting evidence.
- A reasonable requested response timetable.
- An invitation to correct factual inaccuracies.
- The investigator's contact and authorisation details.

The final correspondence should be adapted to the recipient.

E.80. The importance of a consolidated reference

The project should use the reference:

RNL / PROJECT SPIRE / INVESTIGATION 2026

Individual correspondence may add a sequence number.

This will permit related messages to be identified without confusing them with the separate GRH investigation.

E.81. The standing declaration in correspondence

Where relevant, correspondence should include:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

The declaration should not replace the specific questions.

It provides the interpretative context in which those questions must be read.

E.82. Appropriate written responses

Respondents should be invited to provide direct answers, supporting documents or verified links.

Where a question cannot be answered, the institution should explain the reason.

Where another body is responsible, it should identify that body where practicable.

Where information is still being prepared, an expected availability date may assist.

E.83. Corrections and right of reply

Every materially affected institution or individual should have an appropriate opportunity to correct the record.

A correction should be assessed according to the evidence.

RNL retains responsibility for the final interpretation.

The objective is independent, fair and accurate reporting.

PART XIII — EVIDENCE-BASED NEXT STEPS

E.84. First operational stage

Finalise the formal Church Commissioners covering letter and attach the consolidated questions concerning current legal status, financial reconciliation, governance and safeguards.

Verify the recipient and delivery method before sending.

Record the actual sending date and any acknowledgement.

No communication should be marked sent until it has been issued.

E.85. Second operational stage

Prepare targeted regulatory correspondence for the Charity Commission.

The request should seek current information concerning registration and statutory authorisation.

It should not duplicate questions more appropriately answered by the Commissioners.

E.86. Third operational stage

Prepare an archival-role enquiry for Lambeth Palace Library.

The request should identify the public evidence concerning the relevant Project Spire personnel.

It should seek institutional clarification, not unrelated private employment information.

E.87. Fourth operational stage

Prepare any necessary follow-up concerning external organisational relationships.

Such enquiries should be limited to documented overlap and specific outstanding questions.

They should not imply that a financial or governance relationship has already been proved.

E.88. Fifth operational stage

Review all responses against the question register.

Update Appendices A–D.

Record corrections and remaining evidential limitations.

Distinguish institutional statements from independently verified transactions and legal decisions.

E.89. Sixth operational stage

Where material questions remain unresolved, consider proportionate further enquiries, senior institutional review or legally appropriate information-access routes.

The purpose is evidence collection rather than unnecessary escalation.

E.90. Seventh operational stage

Prepare an updated findings statement after relevant institutional responses have been assessed.

The statement should identify what has changed, what remains open and what can responsibly be concluded.

It should not predetermine findings of wrongdoing.

PART XIV — FORMAL ASSESSMENT

E.91. The documentary investigation has reached a new stage

The completion of the 24 substantive sections and supporting appendices provides a substantial research foundation.

However, the investigation's next progress depends upon documentary disclosure and institutional responses.

Producing additional narrative without new evidence may increase length without resolving the central questions.

The appropriate next step is therefore operational.

RNL should now pursue the specified records.

E.92. The value of consolidated correspondence

The original subject involves multiple institutions and overlapping records.

Without a structured correspondence system, enquiries may become confused.

A consolidated register will show what was asked, when it was asked, who was responsible and whether a satisfactory answer was received.

This will also protect respondents against repeated or inaccurately characterised questions.

E.93. The importance of safeguarding the investigation's independence

RNL must retain control over its own analysis.

Institutions may provide evidence, explanations and corrections.

They should not be permitted to change RNL's intended meaning without consent.

Equally, RNL must remain willing to correct inaccurate claims.

Independence requires both freedom of enquiry and evidential discipline.

E.94. The importance of written institutional answers

Written responses provide a more reliable permanent record of complex legal, financial and governance questions.

They can be checked against original documents.

They also help preserve distinctions concerning uncertainty and authority.

The investigation should therefore prioritise written institutional explanations.

E.95. The financial question remains central

The original £100 million commitment is established.

Preparatory expenditure is documented in aggregate.

However, actual reparatory delivery must be independently verified.

The investigation should follow resources through each financial stage.

The objective is to determine what value reached intended beneficiaries rather than merely what was announced.

E.96. The safeguards question remains central

The Church of England's wider racial-justice framework is documented.

However, the operation of Project Spire-specific safeguards remains an open question.

RNL should seek evidence of policies, risk assessments, complaints procedures and independent review.

The possibility of anti-Black racism and Institutional Racism must remain a legitimate subject for preventative scrutiny.

E.97. The institutional-overlap question remains open

The investigation has established certain overlapping professional roles.

However, formal common Project Spire–GRH governance or financing has not been established.

The question can be clarified through appropriate institutional responses and supporting documents.

No improper relationship should be presumed.

E.98. The right to a fair answer

RNL should receive answers to the questions it actually asks.

A request for safeguards should not be transformed into an allegation.

A request for financial information should not be transformed into an accusation of misappropriation.

A request concerning institutional authority should not be treated as proof of improper influence.

The same obligation applies to RNL's treatment of responses.

Accuracy of meaning is essential.

E.99. The final operational conclusion

The initial Project Spire investigation has identified a substantial body of historical, institutional and financial evidence.

Its most important outstanding matters concern current legal authority, the movement of the original £100 million commitment, complete preparatory expenditure, governance, professional responsibilities, community participation and effective safeguards.

These matters require targeted written enquiries.

The investigation should preserve all responses, permit correction, and update its findings according to the evidence.

The central conclusion of Appendix E is that the Project Spire investigation now requires a coordinated institutional disclosure and accountability programme, supported by a permanent correspondence register, accurate responsibility allocation, proportionate response deadlines and an evidence-based procedure for closing or continuing individual enquiries.

RNL will pursue these matters through lawful, peaceful and professional means.

The investigation makes no accusations, allegations, assumptions, assertions of wrongdoing or conclusions of wrongdoing.

Its purpose remains truth, institutional transparency, fair treatment and practical reparatory justice.

APPENDIX E — STATUS CERTIFICATION

Appendix: E of F
Title: Outstanding Questions, Institutional Disclosure Requests, Correspondence Register, Responsibility Matrix, Response Deadlines and Consolidated Action Plan
Prepared: 18 October 2026
Document status: Consolidated draft completed
Principal questions consolidated: 80
Disclosure categories identified: 16
Action register: 25 actions
Actual outgoing institutional correspondence: Not undertaken through this appendix
Actual response deadlines: To be established upon sending
Institutional responses: Outstanding unless separately recorded in the relevant investigation files

Findings of wrongdoing: None made
Continuing action: Formal correspondence, documentary review and independent verification

Prepared for and on behalf of Reparation Nation Limited

Derrick Emmanuel Lynch
Also known as John Canoe
Company Number: 14761041

The formal signature and authorisation page will appear once, after Appendix F.

END OF APPENDIX E OF F — OUTSTANDING QUESTIONS, INSTITUTIONAL DISCLOSURE REQUESTS, CORRESPONDENCE REGISTER, RESPONSIBILITY MATRIX, RESPONSE DEADLINES AND CONSOLIDATED ACTION PLAN

NEXT: APPENDIX F OF F — INVESTIGATIVE METHODOLOGY, SAFEGUARDS, RIGHT OF REPLY, CORRECTIONS, EVIDENCE PRESERVATION, CONTINUING MONITORING, FINAL DECLARATION AND SIGNATURE AND AUTHORISATION.

PROJECT SPIRE

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

FORMAL INDEPENDENT INVESTIGATION INTO INSTITUTIONAL OVERLAP, REPARATIONS ACCOUNTABILITY, COMMUNITY TRUST, FINANCIAL GOVERNANCE AND CONFLICT PREVENTION

APPENDIX F OF F

INVESTIGATIVE METHODOLOGY, SAFEGUARDS, RIGHT OF REPLY, CORRECTIONS, EVIDENCE PRESERVATION, CONTINUING MONITORING AND THE PERMANENT INVESTIGATION PROTOCOL

Prepared by: Reparation Nation Limited
Company Number: 14761041
Prepared for: Derrick Emmanuel Lynch (John Canoe), for and on behalf of Reparation Nation Limited
Date: 18 October 2026
Document status: Final methodological appendix to the initial 24-section investigative report and Appendices A–E. Institutional responses, further documentary verification and subsequent findings remain open.

PART I — PURPOSE, AUTHORITY AND INDEPENDENCE

F.1. Purpose of this appendix

This appendix establishes the permanent investigative rules governing Reparation Nation Limited's examination of Project Spire.

It is intended to preserve the accuracy, independence and integrity of the investigation after completion of the initial documentary report.

The preceding 24 sections examined the Church Commissioners for England's historical financial connections with African chattel enslavement, their proposed £100 million reparatory response, the Fund for Healing, Repair and Justice, governance, consultation, institutional responsibilities, professional appointments, financial expenditure and safeguarding arrangements.

The six appendices provide the supporting framework.

Appendix A contains the consolidated evidence register.

Appendix B establishes the master chronology.

Appendix C identifies the relevant institutions, organisations and persons.

Appendix D provides the financial accountability and reparatory delivery register.

Appendix E consolidates institutional questions, disclosure requests and the continuing action plan.

Appendix F establishes the methodological standards under which those materials must be maintained, corrected and extended.

The purpose is to prevent future investigative drift, unsupported conclusions, documentary confusion or the loss of original meaning.

F.2. Independence of Reparation Nation Limited

Reparation Nation Limited conducts this investigation independently.

It is not acting as a court, statutory regulator, prosecuting authority or official representative of every Black/Afrikan community.

It does not claim legal authority to compel disclosure of documents where no applicable legal power exists.

It does, however, retain the right to examine publicly available evidence, request information, question institutional decisions, present reasoned criticism and publish appropriately supported findings.

Participation by another institution does not give that institution control over RNL's conclusions.

Equally, independence does not release RNL from its responsibility to examine contrary evidence fairly.

F.3. The investigator's authority

The investigation is undertaken by Derrick Emmanuel Lynch, also known as John Canoe, for and on behalf of Reparation Nation Limited.

The investigator determines the scope of the enquiries and maintains responsibility for the accuracy of the resulting report.

That authority concerns the investigation itself.

It does not constitute a mandate to represent every person affected by African chattel enslavement.

The distinction between independent investigative authority and community representation must remain explicit.

F.4. The governing declaration

RNL expressly states:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

These statements must be preserved in their intended meaning.

The first concerns evidence of institutional safeguards against the possibility of racial bias.

The second confirms that the investigator has not prejudged the conduct of any person or institution.

They are not contradictory.

An investigator may identify a serious risk requiring examination without asserting that the risk has already materialised.

F.5. The right to retain control of meaning

The investigation adopts the following principle:

“You should not have to surrender control of your own meaning in order to receive assistance from an AI system.”

This principle applies to drafting, research, correspondence, summarisation and future revisions.

An observation must not be transformed into an accusation.

A possibility must not be presented as a proven fact.

A suspicion must not become an allegation without the investigator's express intention.

A question must not be rewritten as a conclusion.

Words such as *appears*, *possible*, *suspect*, *reported*, *unverified* and *not established* must retain their evidential significance.

AI assistance must support the investigator's meaning rather than replace it.

F.6. The distinction between assistance and authority

AI-generated research assistance, drafting, summaries and analysis do not constitute independent verification merely because they are presented confidently.

Every material historical, legal, financial or institutional proposition must be traced to an appropriate source.

Where a source has not been checked, the report must say so.

Where an interpretation is the product of analysis rather than an explicit statement in a document, that distinction must remain visible.

The investigator retains responsibility for approving the final wording.

F.7. The principle of no predetermined conclusions

The investigation must remain open to outcomes supported by the evidence.

It must be willing to confirm institutional explanations where records establish their accuracy.

It must also remain willing to question explanations that are incomplete, contradictory or unsupported.

No conclusion should be selected merely because it confirms an existing suspicion.

No legitimate question should be abandoned merely because it challenges an institution.

The objective is to determine what the evidence actually supports.

PART II — EVIDENTIAL METHODOLOGY

F.8. The primary-source principle

Where an original document exists, it should be preferred over a secondary summary for determining its actual contents.

Relevant primary materials include official research reports, historical financial ledgers, governing documents, parliamentary answers, regulatory decisions, contracts, original correspondence and financial statements.

A secondary report may identify an important lead.

However, it should not automatically replace the underlying primary record.

F.9. The distinction between evidence and interpretation

Evidence may establish that a particular event occurred.

Interpretation concerns its significance.

For example, a published programme may establish that a person was listed as a speaker.

It does not necessarily establish the nature of that person's employment or financial authority.

Similarly, a financial statement may establish that an institution reported a commitment.

It does not automatically establish completed beneficiary receipt.

Every interpretation must remain consistent with the evidence.

F.10. Source identification

Each material source should be assigned a unique identifier.

The record should identify the title, issuing institution, publication date, source location and date examined.

Where the source is a PDF, the original document should be retained where permitted.

Where the source is an email, the complete original message should be preserved where available.

Where a webpage changes, materially different versions should be recorded separately.

F.11. Evidence-strength classification

The investigation adopts the master classification system established in Appendix A.

It distinguishes primary records, official institutional positions, parliamentary answers, historical research, first-person accounts, secondary reporting, contested material, unverified propositions and corrections.

A fact must not be classified as independently corroborated merely because several sources reproduce the same original claim.

The source relationship must be examined.

F.12. Historical evidence

Historical claims should be evaluated using the original records and the methods of relevant researchers.

Where financial records are incomplete, that limitation should be acknowledged.

Where scholars disagree about interpretation, the competing reasoning should be considered.

The investigation should distinguish the existence of a historical investment from the precise economic benefit derived from it.

It should also distinguish historical monetary equivalents from contemporary assets.

F.13. Financial evidence

Financial claims require particular precision.

An announcement is not a transfer.

An allocation is not an expenditure.

An investment is not automatically compensation.

A grant award is not necessarily a completed payment.

A payment is not automatically a verified reparatory outcome.

These categories should be maintained separately in Appendix D.

F.14. Legal evidence

Legal conclusions should be supported by applicable legislation, regulatory records and authoritative judicial decisions.

A proposed legal application is not a granted authorisation.

A legal challenge is not a finding that wrongdoing occurred.

A newspaper description of proceedings should not replace original court records where those records are necessary to establish procedural status.

F.15. Professional appointment evidence

A published job title may establish a professional role.

However, it does not automatically establish the employment contract, remuneration, delegated authority or institutional representation.

The investigation should seek relevant appointment records where those details materially affect its conclusions.

Named professional participants must not be treated as financial decision-makers merely because they contributed to research or engagement.

F.16. Community evidence

Community participants may provide firsthand information and legitimate investigative leads.

Their observations should be attributed accurately.

However, an individual's account of what they experienced does not necessarily establish the intentions of another person.

Similarly, an organisation's account of its participation should not automatically be treated as representative of every affected community.

The investigation should preserve the value and limitations of community evidence.

F.17. Public event evidence

A published programme is evidence of an announced event or intended participation.

It may not establish that every session took place exactly as advertised.

Where the actual occurrence or content of an event matters, additional evidence may be required.

An individual's appearance at an event does not establish the event's funding source.

F.18. The prohibition on invented evidence

The investigation must never invent:

- Contracts, payments or financial transfers.
- Dates, meeting records or formal decisions.
- Employment, trustee or advisory appointments.
- Legal authorisations or court judgments.
- Institutional relationships.
- Statements attributed to named individuals.
- Sources or citations.
- Claims of reparatory delivery.

Where information is not available, the report should identify the gap.

An incomplete but accurate record is preferable to an apparently complete record containing unsupported details.

PART III — INSTITUTIONAL BOUNDARIES

F.19. Project Spire's institutional identity

Project Spire is a programme associated with the Church Commissioners' historical research and reparatory response.

It should not automatically be treated as a separate incorporated legal entity.

The responsible legal institution must be identified for each contract, payment or decision.

F.20. Distinguishing Church institutions

The Church Commissioners, Lambeth Palace Library, dioceses, General Synod and other Church bodies may possess different responsibilities.

An event organised by a diocese should not automatically be attributed to the Church Commissioners.

A researcher working at Lambeth Palace Library should not automatically be described as a Church Commissioners employee without evidence.

The legal and administrative boundaries must be preserved.

F.21. The Global Reparations Hub

The Global Reparations Hub remains the subject of a separate RNL investigation.

Documented professional overlap may be cross-referenced.

However, the Project Spire investigation must not presume shared governance, funding or ownership.

A formal relationship requires additional documentary evidence.

F.22. The Black Cultural Centre enquiry

The Black Cultural Centre venue questions form a separate investigation.

They concern advertised event arrangements, venue authority, communications and relevant community concerns.

Those matters should not automatically be attributed to Project Spire.

Only a demonstrated institutional connection justifies substantive cross-reference.

F.23. The principle of institutional responsibility

An institution should be asked questions within its actual responsibilities.

The Church Commissioners should answer for their own decisions.

The Charity Commission should address regulatory matters within its jurisdiction.

Lambeth Palace Library should address relevant archival responsibilities.

External organisations should be invited to clarify their own activities.

This avoids unnecessary institutional confusion.

PART IV — SAFEGUARDS AGAINST ANTI-BLACK RACISM AND INSTITUTIONAL RACISM

F.24. Recognition of possibility

RNL's safeguards enquiry concerns the possibility of anti-Black racism, racial bias and Institutional Racism within contemporary institutional processes.

Recognising a possibility does not establish that a discriminatory event occurred.

It identifies a risk requiring appropriate safeguards.

An institution should be capable of explaining how its systems address such risks.

F.25. Institutional policies

Relevant institutions should identify applicable equality, anti-racism, procurement, complaints and governance policies.

The investigation should distinguish Church-wide policies from Project Spire-specific arrangements.

A general policy may be relevant but may not fully explain how a particular decision is protected.

F.26. Operational effectiveness

The existence of a policy does not automatically establish effective operation.

The investigation should seek evidence of implementation, monitoring, training, complaints handling and independent review.

Where such evidence is unavailable, the limitation should be recorded.

It must not automatically be converted into a finding that discrimination occurred.

F.27. Decision-specific safeguards

Safeguards should be examined in relation to particular institutional activities.

Relevant processes include professional appointments, contracts, consultation, investment, grant-making and beneficiary selection.

A risk may arise differently within each process.

The appropriate evidence should therefore reflect the decision being examined.

F.28. Institutional Racism and individual intent

Institutional Racism concerns the operation of institutions and may involve patterns or practices producing racial disadvantage.

A finding should not automatically require proof that a particular individual intended racial harm.

However, the investigation must still possess evidence sufficient to support the specific institutional conclusion.

It should not substitute general historical concerns for examination of contemporary processes.

F.29. The right to raise concerns

A person should be able to raise legitimate concerns about possible racial bias without automatically being treated as having accused a named individual of wrongdoing.

The concern should be addressed according to its actual wording.

The respondent should identify the relevant safeguards and available procedures.

F.30. The right to independent review

Where a serious concern is raised, the institution should explain what independent or impartial review is available.

The investigation should establish whether the reviewer is appropriately separated from the decision being challenged.

The existence of a reviewer is relevant, but its authority and effectiveness should be examined.

F.31. Protection against victimisation

The investigation should seek evidence of safeguards against adverse treatment for raising legitimate complaints or participating in lawful scrutiny.

The applicable protections may depend upon the legal relationship and relevant statutory provisions.

They should not be assumed to apply identically to every individual or organisation.

F.32. RNL's own responsibilities

RNL must apply fair procedures to individuals and institutions examined.

It should not treat racial identity as proof of authority, misconduct or credibility.

It must avoid unsupported personal allegations.

It should also recognise the importance of independent Black/Afrikan expertise without assuming that every person or organisation has the same experiences or interests.

PART V — FINANCIAL ACCOUNTABILITY PROTOCOL

F.33. The money-trail principle

The investigation must establish what financial resources were promised, authorised, allocated, transferred, invested, granted, received and verified.

Each stage should be recorded separately.

The same capital should not be counted repeatedly as it moves between institutions.

F.34. Preparatory expenditure

Historical research, legal preparation, consultancy, engagement and governance costs should be classified as preparatory expenditure unless the evidence supports a different classification.

Such expenditure may be necessary for an effective programme.

However, it should not automatically be counted as reparatory benefits received by affected communities.

F.35. Capital transfer

A transfer must be supported by evidence identifying the sending institution, receiving entity, amount, date and authority.

An announced intention to transfer money is insufficient.

F.36. Investments

Completed investments should be supported by transaction records.

The investment's financial structure, ownership, risks and intended outcomes should be recorded.

An investment should not automatically be described as a grant or compensation payment.

F.37. Grants

A grant should be recorded separately from investment capital.

The date of award, amount approved, payment date and recipient acknowledgement should be distinguished.

F.38. Beneficiary receipt

Receipt should be established through adequate documentation.

Where confidentiality prevents disclosure of individual financial information, appropriately aggregated verification may be considered.

F.39. Reparatory outcomes

A completed payment does not automatically demonstrate that the intended reparatory outcome has been achieved.

The relevant benefit should be evaluated using appropriate evidence.

Unsuccessful or incomplete outcomes should also be recorded.

F.40. Financial corrections

Where a reported figure changes, the original and revised statements should remain traceable.

Disputed figures must not be presented as established expenditure.

No missing figure should be replaced with an invented amount.

PART VI — RIGHT OF REPLY AND PROCEDURAL FAIRNESS

F.41. Purpose of the right of reply

The right of reply protects the fairness and credibility of the investigation.

It permits materially affected individuals and institutions to identify errors, provide additional documents and explain relevant decisions.

It does not give a respondent authority to dictate the investigator's conclusions.

F.42. When a right of reply should be offered

A right of reply should ordinarily be offered before publishing material new adverse findings concerning identifiable persons or institutions, where practicable and appropriate.

A request should identify the relevant evidence and the specific point requiring response.

It should not present an unresolved question as a proven allegation.

F.43. Form of the request

A right-of-reply request should identify the investigator, subject, relevant source and proposed finding or question.

It should invite documentary clarification.

Where a response deadline is requested, the period should be reasonable in light of the complexity and urgency.

F.44. Treatment of responses

Responses should be preserved accurately.

Where a respondent confirms a factual matter, that should be recorded.

Where they dispute a claim, the dispute and supporting evidence should be examined.

Where they decline to respond, the reason should be recorded if supplied.

F.45. Silence

Silence is not proof of wrongdoing.

A lack of response may leave a question unresolved.

The investigation may accurately report that an appropriate request was sent and no response received by a specified date.

It should not invent motives for the silence.

F.46. Corrections supplied by respondents

Where a respondent supplies reliable evidence correcting a factual error, the report should be amended.

The change should be dated.

The original source and revised evidence should remain traceable.

F.47. Competing interpretations

Different interpretations may remain possible after responses are considered.

The investigation should assess each according to the evidence.

It should not automatically accept the institution's preferred interpretation.

Nor should it automatically reject that interpretation merely because the institution is under examination.

F.48. Fairness to community participants

The right of reply should also protect individuals and grassroots organisations whose participation or position is described.

An organisation should be able to correct an inaccurate claim that it endorsed a programme.

A person should be able to clarify whether they spoke personally or under an institutional mandate.

The objective is accurate representation.

PART VII — CORRECTIONS AND VERSION CONTROL

F.49. The permanent corrections register

RNL should maintain a register of material corrections.

Each entry should identify the original statement, revised wording, evidence supporting the correction, date and affected sections.

Corrections should not be concealed.

F.50. Types of correction

Corrections may concern names, dates, professional roles, legal status, financial amounts, organisational relationships or interpretations of evidence.

A correction may be factual or analytical.

The register should distinguish the two.

F.51. Corrections to financial figures

Financial corrections require particular care.

An amount should not be revised without identifying the source and relevant reporting period.

A historical estimate should not be silently replaced by an actual transaction figure.

F.52. Corrections to institutional relationships

Where new evidence establishes or disproves a formal relationship, the relevant register should be updated.

Professional association must remain distinct from financing and governance.

F.53. Corrections to historical interpretation

Historical scholarship may develop.

New archival material may alter an earlier interpretation.

The investigation should preserve the relevant original evidence and explain the change.

F.54. Version numbering

The initial assembled report should be assigned a version identifier.

A suggested scheme is:

Version 1.0 — Initial assembled investigative report

Later minor factual and documentary corrections may be recorded as 1.1, 1.2 and so forth.

A substantial revision incorporating institutional responses may receive a new major version.

Version numbers should not be assigned retrospectively to drafts that did not actually exist in that form.

F.55. No silent overwriting

Earlier versions should remain accessible within the permanent archive where appropriate.

The purpose is to preserve the history of the investigation's development.

PART VIII — EVIDENCE PRESERVATION AND INFORMATION PROTECTION

F.56. Permanent evidence archive

The investigation should preserve original source documents.

The archive should be organised according to the evidence identifiers established in Appendix A.

Documents should not be renamed or altered in a way that prevents identification of their original form.

F.57. Original correspondence

Full original correspondence should be preserved where available.

Where only an extract or screenshot exists, that limitation should be recorded.

A screenshot should not automatically be treated as a complete original email.

F.58. Source dates

Every material record should identify the publication or event date.

For changing webpages, the date examined should also be recorded.

Where a later statement supersedes an earlier position, both should remain traceable.

F.59. Legal and personal information

The investigation should protect private personal information where disclosure is unnecessary.

This includes unrelated addresses, account details, private contact information and sensitive records.

The need for institutional transparency does not automatically justify publication of every item of personal data.

F.60. Confidential documents

A document marked confidential should be assessed according to the actual legal and ethical restrictions applicable to it.

RNL should not assume that every confidentiality assertion prevents all discussion.

Equally, it should not disregard legitimate privacy, privilege or contractual restrictions.

Appropriate redaction or aggregate reporting may sometimes permit relevant disclosure.

F.61. Preservation of originals

Where a document is transformed into another format, the original should be retained.

The transformation should not change the meaning of its contents.

Extracted passages should remain traceable to the source.

F.62. Documentary chain of custody

The investigation should record where a document came from, when it was received and whether it has been altered.

Where authenticity is materially disputed, additional verification may be necessary.

The purpose is to protect the reliability of the evidential record.

PART IX — CONTINUING MONITORING

F.63. The purpose of monitoring

Project Spire may develop after completion of the initial investigation.

The proposed fund may receive regulatory approval.

Its governance structure may be finalised.

Assets may be transferred or invested.

Grants may be awarded.

Further public statements or legal proceedings may arise.

The investigation should therefore remain capable of incorporating subsequent developments.

F.64. Regulatory monitoring

RNL should periodically check authoritative public records concerning charity registration and relevant authorisations.

Any change should be dated.

Earlier statements should not be silently erased.

F.65. Financial monitoring

The investigation should examine new annual accounts and material financial announcements.

It should distinguish reported expenditure from completed reparatory delivery.

F.66. Investment monitoring

Where investments occur, the register should record their nature, value, ownership and outcomes.

Projected returns should not be presented as realised gains.

F.67. Grant monitoring

Where grants are awarded, the investigation should distinguish approval, payment, receipt and verified outcomes.

A grant announcement should not automatically be treated as a completed transfer.

F.68. Governance monitoring

Changes to trustee appointments, governing documents and delegated authority should be recorded.

Proposed arrangements should remain distinguished from implemented arrangements.

F.69. Professional appointments monitoring

Where relevant professional roles change, the register should be updated.

An appointment described in a publication from an earlier year should not automatically be treated as current.

F.70. Safeguards monitoring

RNL should record new evidence concerning anti-racism and Institutional Racism safeguards.

The investigation should distinguish publication of a policy from demonstrated effectiveness.

F.71. Legal proceedings monitoring

Any legal challenge should be followed through authoritative records where available.

A reported challenge should not be described as a completed judgment.

The investigation should identify actual procedural developments.

F.72. Community consultation monitoring

Further engagement with independent Black/Afrikan organisations should be recorded.

The investigation should examine how contributions influence decisions.

Participation should not be equated automatically with endorsement.

PART X — COMMUNICATIONS AND RESUMPTION PROTOCOL

F.73. The importance of continuity

The Project Spire investigation now consists of 24 substantive sections and six appendices.

Subsequent work should continue from this established structure.

It should not restart the investigation unnecessarily.

The master evidence, chronology, institutions, financial and action registers should be used to identify outstanding tasks.

F.74. The first task upon resumption

The first task should be to review the current action register and identify any institutional responses received since the previous working session.

New evidence should be entered into the relevant appendix.

Questions already answered should not be repeatedly presented as outstanding.

F.75. Review of new documents

Each new document should be examined for relevance, authenticity, date, institutional source and effect on existing findings.

The analysis should identify what the document actually establishes.

It should also identify what it does not establish.

F.76. Updating the master chronology

Any relevant new event should be entered into Appendix B.

The event date and publication date should be distinguished.

Where the exact date remains unknown, the uncertainty should be preserved.

F.77. Updating the institutions register

Where new evidence clarifies an appointment or relationship, Appendix C should be revised.

The register should distinguish historical roles from current roles.

F.78. Updating the financial register

New expenditure, transfers, investments, grants or receipts should be entered into Appendix D using the relevant financial classification.

The same money should not be counted repeatedly.

F.79. Updating the action register

Institutional replies should be entered into Appendix E.

Each response should be classified as complete, partial, declined, referred or outstanding.

Actual dates must be used.

F.80. Preparing a findings update

A findings update should identify what changed since the previous report.

It should explain whether new evidence confirms, contradicts or leaves unchanged an earlier position.

It should not repeat the entire investigation unless necessary.

F.81. Avoiding unnecessary restructuring

The original 24-section structure should be preserved.

Updates should be made through identified corrections, supplements or revised editions.

The investigation should not be reorganised merely because a different presentation seems convenient.

A structural change should serve a clear documentary purpose.

F.82. Maintaining a handover record

At the conclusion of each substantial working session, RNL should retain a brief handover record identifying completed work, outstanding tasks, source locations, unresolved questions and the next action.

The handover should distinguish documents drafted from documents actually sent.

It should also distinguish records saved from records independently checked.

PART XI — SAFEGUARDS FOR PEACEFUL INVESTIGATION

F.83. The preventative purpose of transparency

RNL considers accurate information, accountable institutions and professional organisation important foundations for peace.

Reparatory justice may involve substantial public disagreement.

Historical responsibility, financial allocation and community representation can generate difficult questions.

Those questions should be addressed through evidence and fair procedures.

F.84. Distinguishing criticism from threats

Legitimate criticism should not automatically be characterised as intimidation.

A person may question Project Spire strongly without threatening anyone.

Where actual threats arise, they should be assessed according to the evidence and applicable law.

The investigation must avoid racial stereotyping.

F.85. No presumption of violence

The possibility of threats of violence or violence may be considered in preventative planning.

However, the investigation does not assert that violence is expected.

It does not suggest that Black/Afrikan communities are inherently disorderly or violent.

It does not accuse named individuals of threatening violence.

The purpose is to prevent avoidable conflict.

F.86. Professional treatment of respondents

Requests should remain respectful and precise.

Respondents should be given a fair opportunity to clarify the record.

The investigation should avoid unnecessary personal targeting.

F.87. Professional treatment of communities

Affected communities should be able to raise concerns and participate lawfully.

Their contributions should not automatically be treated as endorsements of institutional decisions.

F.88. Independent review and peaceful resolution

Where serious disputes remain unresolved, appropriate independent review, formal complaint procedures or lawful mediation may be considered.

These arrangements should preserve the right to continue legitimate scrutiny.

PART XII — FORMAL METHODOLOGICAL QUESTIONS

F.89. Questions concerning evidence

Question F.1: What original document supports each material finding?

Question F.2: Is the source primary or secondary?

Question F.3: What exactly does the source establish?

Question F.4: What does it not establish?

Question F.5: Is the relevant date verified?

Question F.6: Does the evidence concern a historical or current position?

Question F.7: Is the finding independently corroborated?

Question F.8: Are competing interpretations recorded?

Question F.9: Are material limitations disclosed?

Question F.10: Has the source been preserved?

F.90. Questions concerning institutional authority

Question F.11: What institution made the decision?

Question F.12: What legal authority applied?

Question F.13: What body approved the action?

Question F.14: Who possessed delegated responsibility?

Question F.15: What original record establishes the authority?

Question F.16: Was the role advisory, administrative or legally determinative?

Question F.17: Were relevant external interests declared where required?

Question F.18: Was any potential conflict properly managed?

Question F.19: Did the institution act within its stated responsibilities?

Question F.20: What remains unresolved?

F.91. Questions concerning financial delivery

Question F.21: What amount was announced?

Question F.22: What amount was formally committed?

Question F.23: What amount was legally authorised?

Question F.24: What amount was allocated?

Question F.25: What amount was actually spent?

Question F.26: What amount was transferred?

Question F.27: What amount was invested?

Question F.28: What amount was granted?

Question F.29: What amount was received?

Question F.30: What reparatory benefit was independently verified?

F.92. Questions concerning safeguards

Question F.31: Does the institution acknowledge the possibility of anti-Black racism, racial bias and Institutional Racism within relevant processes?

Question F.32: What safeguards exist?

Question F.33: What evidence demonstrates their operation?

Question F.34: What independent review exists?

Question F.35: What complaints procedure applies?

Question F.36: What protection exists against victimisation?

Question F.37: How are potential conflicts of interest managed?

Question F.38: How are errors corrected?

Question F.39: How can affected persons challenge decisions?

Question F.40: What safeguards remain to be established?

F.93. Questions concerning fairness and interpretation

Question F.41: Has the investigator preserved the original meaning of each concern?

Question F.42: Has a possibility been incorrectly transformed into an accusation?

Question F.43: Has an institutional position been incorrectly treated as independent proof?

Question F.44: Has professional association been confused with financial authority?

Question F.45: Has consultation been confused with representation or consent?

Question F.46: Have respondents received appropriate opportunities to correct material facts?

Question F.47: Have corrections been recorded transparently?

Question F.48: Have competing explanations been considered?

Question F.49: Are conclusions proportionate to the evidence?

Question F.50: What questions must remain open?

PART XIII — FINAL QUALITY ASSURANCE

F.94. Requirements before final external circulation

Before the assembled report is circulated externally as a final publication, RNL should verify the principal source references.

It should check that document titles, dates, names, financial figures and institutional descriptions are accurate.

It should also check that the report does not contain unsupported assertions about named people.

The right-of-reply arrangements should be considered where material adverse findings are proposed.

The report should clearly distinguish the initial documentary findings from subsequent developments.

F.95. Verification of the 24 substantive sections

The report should be checked for internal consistency.

For example, a legal-status statement in Section 15 should agree with the corresponding entry in Appendix D unless an identified later development changed the position.

Professional-role descriptions in Sections 6, 7 and 20 should agree with Appendix C.

Financial figures in Sections 13, 14 and 19 should reconcile with Appendix D.

Where material differences remain, they should be explained or corrected.

F.96. Verification of the appendices

Appendix A should contain the master evidence references.

Appendix B should preserve the correct chronology.

Appendix C should distinguish individuals and institutions.

Appendix D should classify financial activity accurately.

Appendix E should contain the current action and correspondence status.

Appendix F should govern future investigative procedures.

The appendices should not contradict the substantive report without an express correction or update.

F.97. Verification of source links

Every material citation and URL should be checked before final publication.

A source title should not be accepted as proof that the linked page contains the claimed material.

Where a link no longer works, an authoritative replacement or preserved original should be identified.

No URL should be invented.

F.98. Verification of financial figures

The original £100 million commitment must remain separate from the proposed £1 billion ambition.

The approximate £1 million preparatory expenditure must remain distinguished from the proposed fund capital.

Disputed £5 million figures must remain identified as disputed.

Historical monetary equivalents must not be described as present-day transferable assets.

A complete financial reconciliation should be sought wherever figures remain incomplete.

F.99. Verification of named individuals

Professional titles should be matched to the relevant publication date.

A role held in 2023 should not automatically be represented as current in 2026.

An advisory appointment should not automatically be described as trusteeship.

An event speaker should not automatically be described as a financial beneficiary.

These distinctions should be preserved throughout the report.

F.100. Verification of safeguards language

The final document must preserve the investigator's intended meaning.

Questions concerning the possibility of anti-Black racism and Institutional Racism must remain questions unless evidence supports a further finding.

The report must not claim that the investigator made accusations, allegations, assumptions or conclusions of wrongdoing where they expressly did not.

The safeguarding enquiry should remain substantive and evidence-led.

PART XIV — THE CONTINUING INVESTIGATION PROTOCOL

F.101. Formal closure of the initial drafting phase

The preparation of the 24 substantive sections and six appendices completes the initial documentary drafting phase.

It does not establish that every source has been independently reverified.

It does not establish that all institutional questions have been answered.

It does not establish that the proposed financial fund is fully operational.

The distinction between completed drafting and completed investigative verification must remain explicit.

F.102. Commencement of the institutional disclosure phase

The next operational stage is to issue formal, appropriately targeted enquiries.

The Church Commissioners should receive the principal consolidated request.

The Charity Commission should receive regulatory questions.

Lambeth Palace Library should receive relevant archival-role questions.

Other institutions should be approached only where the evidence justifies the enquiry.

F.103. Evaluation of institutional responses

Each response should be matched to the actual questions submitted.

Complete and partial answers should be distinguished.

Supporting documents should be entered into the evidence archive.

Unanswered matters should remain open.

F.104. Preparation of a subsequent findings statement

After responses are assessed, RNL may prepare a findings update.

The update should identify evidence received, corrections, resolved questions and remaining uncertainties.

It should not predetermine wrongdoing.

F.105. Permanent monitoring

The investigation may continue to monitor regulatory authorisations, financial transactions, fund governance, grants and verified reparatory outcomes.

Future developments should be recorded with dates and sources.

Earlier evidence should not be overwritten.

PART XV — FORMAL CONCLUSION OF APPENDIX F

F.106. Methodological conclusion

The Project Spire investigation now possesses a structured documentary framework.

Its historical, financial, legal, organisational and community dimensions have been examined across 24 substantive sections.

The supporting appendices provide systems for evidence identification, chronology, institutional mapping, financial accountability, formal disclosure and continuing investigative control.

These systems are necessary because the investigation concerns historically significant and institutionally sensitive matters.

The original £100 million commitment is documented.

The historical financial research is documented.

The Oversight Group and its recommendations are documented.

Certain professional roles and overlapping participation in separate reparations initiatives are documented.

However, several important matters remain unresolved.

These include current regulatory status, complete financial deployment, final governance arrangements, contractual relationships, community representation and the effectiveness of safeguards against the possibility of anti-Black racism and Institutional Racism.

The investigation must continue to distinguish established facts from questions requiring further evidence.

F.107. Final conclusion

RNL's investigation is founded upon documentary evidence, accurate attribution, institutional fairness and independent scrutiny.

It must remain open to information that confirms, qualifies or corrects earlier findings.

It must also remain capable of questioning decisions where the evidence justifies further enquiry.

The central conclusion of Appendix F is that the Project Spire investigation must remain governed by strict evidential standards, preservation of original meaning, transparent corrections, fair rights of reply, accurate financial classification, institutional independence and continuing verification of reparatory delivery.

The completion of the initial report is an important stage.

However, the objective is not simply to produce a substantial document.

The objective is to establish a reliable account of historical responsibility, contemporary institutional authority, financial activity, community participation, safeguards and actual reparatory benefit.

RNL remains committed to lawful, peaceful and professionally organised investigative work.

APPENDIX F — STATUS CERTIFICATION

Appendix: F of F
Title: Investigative Methodology, Safeguards, Right of Reply, Corrections, Evidence Preservation and Continuing Monitoring
Prepared: 18 October 2026
Document status: Draft completed
Initial substantive sections: 24 of 24 drafted
Supporting appendices: A–F drafted
Initial documentary drafting phase: Complete
Final source verification: Outstanding
Formal institutional disclosure and response phase: Outstanding
Final findings of wrongdoing: None made
Continuing evidence and financial monitoring: Required

END OF APPENDIX F OF F

FINAL DECLARATION, SIGNATURE AND AUTHORISATION

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

PROJECT SPIRE — THE CHURCH COMMISSIONERS FOR ENGLAND, HISTORICAL FINANCIAL CONNECTIONS WITH AFRICAN CHATTEL ENSLAVEMENT, THE PROPOSED £100 MILLION FUND FOR HEALING, REPAIR AND JUSTICE, INSTITUTIONAL OVERLAP, FINANCIAL ACCOUNTABILITY AND SAFEGUARDS

Prepared by: Reparation Nation Limited
Company Number: 14761041
Date: 18 October 2026

Declaration of investigative independence

I confirm that this document has been prepared as an independent documentary investigation for and on behalf of Reparation Nation Limited.

Its purpose is to examine historical records, institutional responsibilities, financial commitments, governance, professional relationships, community participation, safeguards, communications and the delivery of reparatory justice.

The report consists of 24 substantive investigative sections and six supporting appendices.

The investigation distinguishes established documentary facts from attributed accounts, possibilities, suspicions, disputed interpretations, unresolved questions and findings.

Its contents remain subject to correction where further reliable evidence becomes available.

Declaration concerning anti-Black racism and Institutional Racism

I expressly state:

“I am a Black person and have not received any evidence of safeguards against anti-Black racism and Institutional Racism.”

“I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions.”

My enquiry concerns the possibility of anti-Black racism, racial bias and Institutional Racism in relevant institutional decision-making processes.

I seek evidence of safeguards designed to recognise, prevent, identify and address those risks.

My request for evidence of safeguards must not be recharacterised as an accusation or conclusion that I have not made.

Declaration concerning institutional relationships

The investigation has identified documented professional and institutional associations relevant to Project Spire and separate reparations initiatives.

However, the existence of such associations must not automatically be treated as proof of common governance, financing, improper conflicts of interest or wrongdoing.

The investigation will continue to seek clarification through primary documents and appropriate institutional responses.

Declaration concerning financial accountability

The Church Commissioners' original £100 million commitment is documented.

However, a commitment must remain distinguished from legal authorisation, financial allocation, capital transfer, investment, grant-making, beneficiary receipt and independently verified reparatory benefit.

The investigation will continue to seek documentary evidence of actual financial delivery.

Right of reply and corrections

All relevant institutions and individuals are invited to provide written clarification, supporting documents, corrections and responses concerning matters within their responsibility.

Material corrections will be recorded transparently.

The report will remain subject to further verification and updating.

No silence, refusal or incomplete response will automatically be treated as proof of wrongdoing.

Authorisation for continuing investigation

I authorise this report to serve as the initial documentary foundation for continuing the Project Spire investigation on behalf of Reparation Nation Limited.

It may be used for lawful institutional correspondence, requests for information, rights of reply, documentary verification, public discussion, corrections and subsequent evidence-based reporting.

Any external publication or circulation should preserve the integrity of the original meaning and distinguish draft findings from matters not yet verified.

The initial drafting phase is complete.

The institutional disclosure and independent verification phases remain open.

Formal signature

Derrick Emmanuel Lynch
Also known as John Canoe

For and on behalf of:

REPARATION NATION LIMITED
Company Number: **14761041**

Signature: _____

Date: 18 October 2026

Place: London, England

FINAL REPORT CERTIFICATION

Report title: FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

Subject: PROJECT SPIRE

Substantive sections: 24

Supporting appendices: 6 (A–F)

Formal signature and authorisation: Included

Initial documentary drafting: Complete

Master evidence and source verification: Further checking required

Formal institutional disclosure: Outstanding

Independent final verification: Outstanding

Conclusions of wrongdoing: None made

Continuing monitoring: Required

FORMAL END OF THE INITIAL PROJECT SPIRE INVESTIGATION REPORT

FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

REPARATION NATION LIMITED

18 OCTOBER 2026

The initial documentary drafting is complete. The investigation continues through evidence, written institutional responses, independent verification, transparent corrections and the peaceful pursuit of reparatory justice.

SIGNATURE AND AUTHORISATION

Report: FROM COMMUNITY RUMOURS TO DOCUMENTED EVIDENCE

Subject: PROJECT SPIRE — INDEPENDENT INVESTIGATION

I authorise this report as the initial documentary investigation prepared for and on behalf of Reparation Nation Limited.

The report remains open to further evidence, institutional responses, corrections and independent verification.

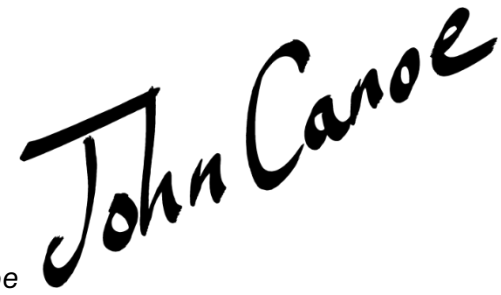
I make no accusations, no allegations, no assumptions, no assertions of wrongdoing, and have come to no conclusions concerning wrongdoing.

Signed for and on behalf of:

REPARATION NATION LIMITED
Company Number: 14761041



Derrick Emmanuel Lynch



Also known as John Canoe

Signature:

Date: 18 October 2026

Place: London, England

Capacity: Authorised Representative, Reparation Nation Limited