

# **The Biblical and Legal Imperative for Transparency and Humility in Charitable Governance: A Critique of the FIEC’s Resistance to Accountability – *Brendon Naicker, (www.ifjr.org)***

## ***Abstract***

*This article examines the principles of transparency and humility as both biblical mandates and legal requirements for charitable organisations, with a particular focus on the Fellowship of Independent Evangelical Churches (FIEC). Drawing on scriptural teachings and the Charity Commission’s guidelines, the article argues that charitable entities must operate with integrity, accountability, and a willingness to engage with stakeholders. It critiques the FIEC’s apparent resistance to addressing legitimate concerns raised by stakeholders, highlighting the dissonance between its actions and the values it purports to uphold. The article concludes with a call for the FIEC to embrace a posture of humility and transparency in line with its Christian mission and legal obligations.*

## **Introduction**

Charitable organisations, particularly those rooted in faith-based traditions, are entrusted with a dual responsibility: to fulfil their mission in accordance with their stated values and to operate in compliance with legal and regulatory frameworks. For Christian charities, this responsibility is further underscored by biblical principles that emphasise justice, equity, and humility. The Fellowship of Independent Evangelical Churches (FIEC), a prominent evangelical network in the UK, presents itself as a beacon of Christian ministry and public benefit. However, recent concerns raised about its approach to intercultural ministry, financial transparency, and governance suggest a troubling resistance to accountability. This article explores the biblical and legal imperatives for transparency and humility, critiques the FIEC’s apparent disregard for these principles, and calls for meaningful reform.

## **Biblical Foundations of Transparency and Humility**

### ***1. Transparency as a Biblical Value***

The Bible consistently emphasises the importance of integrity and openness in leadership. Proverbs 11:3 states, “The integrity of the upright guides them, but the unfaithful are destroyed by their duplicity.” Similarly, Jesus admonishes his followers to “let your light shine before others, that they may see your good deeds and glorify your Father in heaven” (Matthew 5:16). These passages underscore the need for leaders and organisations to operate in a manner that is open, honest, and above reproach.

For a Christian charity like the FIEC, transparency is not merely a legal requirement but a spiritual obligation. By failing to address concerns about its governance and financial practices, the FIEC risks undermining its witness and betraying the trust of its supporters.<sup>1</sup>

### ***2. Humility as a Christian Virtue***

Humility is a central theme in Scripture, exemplified by Christ’s own life and teachings. Philippians 2:3-4 urges believers to “do nothing out of selfish ambition or vain conceit.

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<sup>1</sup> *The Holy Bible, New International Version (NIV)* (2011), Proverbs 11:3; Matthew 5:16.

Rather, in humility value others above yourselves, not looking to your own interests but each of you to the interests of others.” This call to humility extends to organisational leadership, which must be willing to listen, learn, and respond to constructive criticism.<sup>2</sup>

The FIEC’s apparent refusal to engage with stakeholders who raise legitimate concerns reflects a troubling departure from this biblical ideal. Instead of embodying humility, the FIEC appears to adopt a posture of defensiveness and superiority, as though it is above reproach.<sup>3</sup>

## **Legal and Regulatory Framework for Charitable Governance**

### ***1. The Charity Commission’s Guidelines***

The Charity Commission for England and Wales mandates that charitable organisations operate with transparency, accountability, and a commitment to public benefit. Trustees are required to ensure that resources are used effectively, that decision-making processes are fair and inclusive, and that the charity’s activities align with its stated objectives.<sup>4</sup>

Specifically, the Commission emphasises the importance of diversity and inclusion within charitable governance, stating that “trustees should ensure that their charity is inclusive and accessible to all sections of society.”<sup>5</sup> The FIEC’s lack of ethnic representation in its leadership structures and its apparent neglect of intercultural ministry raise serious questions about its compliance with these guidelines.<sup>6</sup>

### ***2. Public Benefit and Stakeholder Engagement***

As a registered charity, the FIEC is obligated to demonstrate public benefit. This includes not only its activities but also its governance practices. Stakeholders, including donors, congregants, and the wider public, have a legitimate interest in understanding how the charity operates and how it addresses issues of concern.<sup>7</sup>

The FIEC’s failure to respond to repeated inquiries about its governance and financial practices suggests a disregard for its stakeholders and a lack of commitment to public accountability. This is particularly concerning given the charity’s reliance on public trust and donations.<sup>8</sup>

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<sup>2</sup> *The Holy Bible, New International Version (NIV)* (2011), Philippians 2:3-4.

<sup>3</sup> John Stott, *The Living Church: Convictions of a Lifelong Pastor* (IVP Books, 2006), 45.

<sup>4</sup> Charity Commission for England and Wales, *The Essential Trustee: What You Need to Know, What You Need to Do* (2020), accessed March 2025, [<https://www.gov.uk/government/publications/the-essential-trustee-what-you-need-to-know-cc3>].

<sup>5</sup> Charity Commission for England and Wales, *Public Benefit: Reporting Guidance* (2013), accessed March 2025, [<https://www.gov.uk/government/publications/public-benefit-reporting-pb3>].

<sup>6</sup> Michael O. Emerson and Christian Smith, *Divided by Faith: Evangelical Religion and the Problem of Race in America* (Oxford University Press, 2000), 112.

<sup>7</sup> Charity Commission for England and Wales, *Charity Reporting and Accounting: The Essentials* (2020), accessed March 2025, [<https://www.gov.uk/government/publications/charity-reporting-and-accounting-the-essentials-cc15b/charity-reporting-and-accounting-the-essentials>].

<sup>8</sup> Beth Breeze, *How Donors Choose Charities: The Role of Personal Taste and Experiences in Giving Decisions*, *Voluntary Sector Review* 8, no. 2 (2017): 165-183.

# The FIEC's Resistance to Accountability: A Case Study

## *1. Intercultural Ministry and Leadership*

The FIEC's decision to assign responsibility for intercultural ministry to an individual already serving as IT Manager, despite its substantial income of £2,177,698 (2023), reflects a lack of prioritisation for this critical area. The absence of a dedicated, full-time Intercultural Ministry Director with relevant expertise undermines the charity's stated commitment to diversity and inclusion.<sup>9</sup>

Furthermore, the FIEC's refusal to provide details of the recruitment process for the Intercultural Ministry Advisor role raises concerns about fairness and transparency. This lack of openness is inconsistent with both biblical principles and legal requirements.<sup>10</sup>

## *2. Financial Transparency and Governance*

The FIEC has not clarified whether it has a dedicated budget for intercultural ministry or diversity initiatives, nor has it provided measurable outcomes to demonstrate progress in increasing ethnic representation within its leadership structures. This lack of financial transparency undermines public trust and calls into question the charity's commitment to its stated objectives.<sup>11</sup>

The FIEC's apparent unwillingness to engage with stakeholders who raise these concerns suggests a troubling sense of entitlement and a belief that it is above reproach. This attitude is antithetical to the values of humility and accountability that are central to both Christian teaching and charitable governance.<sup>12</sup>

## **Conclusion: A Call for Reform**

The FIEC's resistance to accountability is not only a legal and ethical failing but also a spiritual one. As a Christian charity, the FIEC is called to embody the values of transparency, humility, and justice in all aspects of its operations. By refusing to engage with legitimate concerns, the FIEC risks damaging its reputation, undermining its mission, and betraying the trust of its supporters.<sup>13</sup>

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<sup>9</sup> Soong-Chan Rah, *The Next Evangelicalism: Freeing the Church from Western Cultural Captivity* (IVP Books, 2009), 78.

<sup>10</sup> Charity Commission for England and Wales, *Charity Governance Code* (2017), accessed March 2025, [<https://www.charitygovernancecode.org>].

<sup>11</sup> NCVO, *Equality, Diversity, and Inclusion in Charities* (2020), accessed March 2025, [<https://www.ncvo.org.uk/help-and-guidance/running-a-charity/equity-diversity-inclusion>].

<sup>12</sup> Ronald J. Sider, *Scandal of the Evangelical Conscience: Why Are Christians Living Just Like the Rest of the World?* (Baker Books, 2007), 45.

<sup>13</sup> Wayne Grudem, *Business for the Glory of God: The Bible's Teaching on the Moral Goodness of Business* (Crossway, 2003), 67.