Review of Safeguarding and Child Protection

in ISKCON Mayapur and Vrindavan schools

8th February, 2023

1. Overview

In a letter dated 22nd November 2022 (Annex 1), Navina Krishna das wrote to the GBC body outlining concerns about the ongoing leadership and governance failures within ISKCON schools. GBC member Tapan Misra das, helped develop a formal proposal off the back of this letter that was then approved by the GBC body to trigger an 8-week inquiry with a focus on schools in Mayapur and Vrindavan (Annex 2).

To be clear, this inquiry was to aid understanding of how to improve our governance of schools – the inquiry was not about investigating any specific incident or person.

The inquiry team, made up of volunteers, included Usha Sahni, Dr James Biddulph, Chaitanya Mangala, Kapila Monet, Sandipan Krishna das, Veera Makwana, and Vrindavan-bihari das. Brief bios of the team's two education specialists are included in Annex 3.

13 interviews, each lasting 60-120 minutes, were conducted by Navina Krishna das with the Mayapur Executive Board, Mayapur Co-Directors, Mayapur CPT, leadership teams from all four schools, Vrindavan CPT, International CPO, India CPO and North America CPO. The interviews were our main source of data. A meeting with the Bureau was requested but declined; however, an email exchange did transpire with the Vice Chair of the Bureau responding to questions asked.

What follows is a summary of the inquiry's findings, recommendations and suggested next steps. We request that the GBC EC make this paper publicly available in the spirit of transparency.

2. Key findings

The following are some of the key themes which emerged from our interviews:

i. The wide gap between GBC and CPO decisions, and their respective implementation, is a recurring and tragic theme. Had all the GBC resolutions been enforced, had historic CPO sanctions been implemented, it is almost certain that many children would not have been abused. That is the heavy price paid by our communities for leaders 'being asleep at the wheel'.

ii. There appear to be well-meaning devotees in positions of responsibility but who have not had access to adequate governance, training, support, staffing, systems or policies. ISKCON seems to be operating schools as a 'side-show'. For example, ISKCON has world-class deity worship, yet the comparative leadership attention, care and funds placed into protecting children is woefully lacking.

iii. The current arrangements between the International CPO and India CPO are in a complete mess and coordination between the two entities virtually non-existent. There is no clear delegation or lines of authority. On paper the GBC resolutions appear to be clear, but in practice they have not been implemented. The Indian Bureau has resolved for the Indian CPO to report to the Bureau and not to the International CPO, contrary to the GBC resolution. This gap between the GBC and the Bureau has caused intense confusion, scapegoating and impotency.

iv. It has been made clear to the inquiry that the Bureau is the ultimate authority for ISKCON in India and is not obliged to cooperate with the GBC. This means that it is even more critical for the lines of governance to be made clear and the CPO and India CPO relationship to be made watertight.

v. CPO decisions have not been made public and this has kept abuse and abusers hidden from public view. From what we can gather, this has been the case because ISKCON is concerned that perpetrators might sue the institution for slander. It does not appear that we have explored all avenues to find a workaround to keep our communities safe.

vi. Schools do not appear to have the capacity internally to deal with child protection matters. The CPO/CPT is relied upon to fill this deficiency and that is completely unrealistic.

vii. Leaders seem unwilling to accept the depth of cultural malaise. Individuals within child protection roles have been threatened, beaten, and forced out. Individuals previously identified, through internal investigations, to be child molesters have been allowed to feature as high-profile spokespersons for flagship projects such as TOVP, or to be employed in positions of significant influence. Governance structures are riddled with potential conflicts of interest that would potentially limit the level of independent challenge (for example, disciples being on the same board as their spiritual master) or are at risk of group think because there is a lack of genuinely independent governors. And so on.

viii. The CPO office budget went from $160,000 in year 1998 to the current $10,000 in 2022. ISKCON seems habituated to cycles of experiencing a child protection tragedy, followed by a spurt of child protection activity as a knee-jerk ‘mode of passion’ response, followed by a ‘mode of ignorance’ lull, until the next tragedy. There has been no systemic, cultural shift.

3. Recommendations

i. **Governance and accountability.** The remit of this inquiry is limited to schools but suffice to say that governance failures as related to schools is symptomatic of governance failures in the institution as a whole. We have limited our suggestions to how school governance can be developed and believe these principles could be tweaked to be made workable for most countries.

a. The current CPO/CPT functions are overburdened due to a lack of capacity and funding. They are also conflicted by supporting all aspects of safeguarding and then also auditing schools. For schools and leaders to have faith in the CPO, it needs significant additional capacity and structured as a truly international entity with fully integrated regional and local representation. There needs to be a new and separate function established as a School Inspectorate. The CPO should have regional representation (e.g. India CPO), in line with previous GBC resolutions, and not separated out. The CPO can then report to the GBC on all schools, and to the Indian Bureau for schools in India, but all international regional CPOs should be managed and coordinated by the International CPO. The School Inspectorate should be established by the GBC, operating completely independently, and be endowed with certain powers. They must be comprised of experienced educationalists with substantial expertise in safeguarding in school settings. The School Inspectorate should source inspectors from a global pool and coordinate inspections internationally. This is elaborated on further below.

b. Reports from the regional CPOs and International CPOs should include a dashboard stating key information, such as number of complaints, ongoing investigations, rulings, and so forth. Data for the individual school level should be shared with the school's governance body.

c. At school leadership and governance levels there must be a clear vision for child protection supported with appropriate policies and procedures, clear and measurable objectives and goals, appropriate levels of capability, competency, and energy to deliver on the objectives and goals, documented responsibilities for everyone with a clear assessment against their delivery. Leaders should be requested to step down at any level of the structure if they are not 'on board' with the vision for child protection or are undermining it by their words or actions.

d. There must not be any 'shadow' boards operating and 'soft power' must not be wielded (e.g. by initiating gurus, Bureau members, or GBC members) on that board. To help ensure that members of a governing body take their responsibilities seriously, if any member of the governing body of a school is found negligent in their duty to ensure safeguarding, they should be barred from holding any future leadership or managerial responsibilities connected to ISKCON.

e. The regional CPO should appoint a safeguarding lead to each school's governing body.

f. The international CPO should have a victim support function established that can support victims in bringing credible cases against perpetrators or negligent leaders/ managers. It might well be appropriate to fund this by charging the relevant negligent ISKCON authorities involved with the school to pay for costs, such as legal representation and advice, counselling, and further investigations.

g. The School Principal should be the Designated Safeguarding Lead and not delegate this responsibility. This requirement can be removed with the permission of the new school inspection function if a school has proved itself to have excellent safeguarding practice. The principal can then delegate this role to another senior leader in the school though can never relinquish overall accountability for safeguarding.

h. A departmental lead at GBC level should be appointed for child safety who holds direct accountability for ensuring oversight, funding, and implementation of all safeguarding related resolutions.

ii. Regulation and scrutiny.

a. The very best legal guidance must be sought urgently to implement measures that will allow for publication of information necessary for effective child protection. This could include 'struck off' or 'barred' lists, safeguarding investigative reports, and sanctions issued against individuals. This might be supported at employee level where contracts stipulate their acceptance of such powers.

b. There must be genuinely independent, no-notice, annual safeguarding inspections. Safeguarding standards at these inspections must be met for a school to remain open, taking into consideration key areas such as levels of qualification, experience for leaders, educators, resources etc. These inspections may well trigger further school inspections if

the inspecting team feels necessary. These reports should be made publicly available in both English and the local language.

iii. Culture and systems of recording and reporting.

a. The GBC must insist on setting exemplary standards of transparency and integrity in responding to and supporting others to respond to cases when they occur. The GBC should set a culture where 'nobody is above the law' and insisting that their own members do not get involved with leadership, governance, or influence over a school unless they explicitly agree in writing to their liabilities in doing so (which should be personal and significant).

b. Leaders should not be allowed to defend or promote individuals who have been judged to have been involved in child maltreatment, nor prioritise the reputation of the institution above the welfare of a child, as has been attempted (and of course failed) in the past. The GBC must receive training on the appropriate management of these issues and negative global impact on the institution in failing to put the interests of children first.

c. Related to i(d), the GBC must work towards reducing bureaucracy that could obfuscate any investigation or implementation of any policy or resolution on the ground. There have been too many GBC resolutions that have been allowed to flounder at the expense of child welfare. The GBC should understand why that is the case and publish how they will remedy this.

d. The GBC must ensure that their Whistle-blowing Policy and responses are adequate.

e. Schools are community hubs, and it will almost always be the case that there is a blurred line between 'community' and 'school'. This means that information sharing, and public-facing announcements or notices are of critical importance. This also includes clear guidance on how to whistle-blow and external bodies that can be contacted to report concerns.

f. One of the most powerful ways to shift culture will be through training. There is appears to be an unacceptable deficit in what leaders understand about safeguarding. The CPO must deliver mandatory annual safeguarding training to all levels of school governance, from the GBC body down to individual school communities.

4. Proposed Re-structure

The below proposed re-structure of safeguarding for ISKCON schools will go some significant way to addressing the issues outlined above and the proposed recommendations:

CPO	Areas of Responsibility
International Team	
	Create safeguarding policies and procedures
	Implement cultural recommendations
	Implement directives from School Inspectorate
	Maintain international barred/struck-off list
	Victim support, including legal
	Reports to GBC: failures in system, serious cases, concerns from Regional Teams
Regional Team	
	Support schools as point of escalation and investigation
	Provide training and CPD
	Carry out termly developmental school visits
School Team	
	Ensure there is a designated local governor lead
	Implementing policies, including safer recruitment and training

School Inspectorate	Areas of Responsibility
Trained education professionals with internationally recognized safeguarding training	
	Set criteria for training
	Power to carry out no-notice inspections, with a minimum of one per school per year
	Power to instruct closure of school, with school able to appeal decision with GBC or IB
	Receive whistle-blowing
	Power to carry out investigations
	Power to publish inspection reports in the public domain (based on legal advice)

And at a school level:

School Governance	Areas of Responsibility
Members to at least include:	**To include at least:**
2 elected parents	Performance management of Principal
1 principal	Termly reporting to CPO Regional Team
1 appointed by CPO (Regional Team)	
Plus, up to 5 co-opted others	
All members to be approved by CPO International Team	

5. Finance

We have not carried out a detailed analysis of what the financial cost of such a structure would cost. As an estimate, we would suggest that the GBC should be willing to allocate approximately US$10,000 per school per year assuming a minimum of 20 schools. For India alone, we would estimate the cost at close to US$100,000 per year.

6. Conclusion

Running schools is serious business. When schools struggle with resources (financial, personnel or other), safeguarding can suffer. Any school – new or existing – should be able to evidence a clear approach to resource planning. This includes funding to secure the CPO and School Inspectorate functions, in addition to insurances or other 'sinking fund' mechanisms to cover victim support. This might come from the local ISKCON centre or leader that decides to subsidise a school affiliated to ISKCON, or it might come from the school itself. Either way, the GBC should set schools up for success and that means accepting the significant financial and managerial resources burden that comes with that. If that is not possible, the GBC should start the process of closing down ISKCON schools that cannot evidence set standards of safeguarding excellence.

Annex 1

FAO: ISKCON GBC
20th November 2022

Dear Members of the GBC,

Please accept my humble obeisances. All glories to Srila Prabhupada.

Hare Krishna.

I am the founding CEO of a group of UK government-supported schools that are based upon the principles of Krishna consciousness, so child protection is naturally of paramount importance to me. It is deeply troubling to see that within ISKCON, we still don't seem to have our culture right about this most important matter. I write the below with the intention to help move things forward so that we – the members of ISKCON – can hand-on-heart say that we are doing everything reasonably possible to ensure that child abuse is eradicated from our communities.

Recently, a case has been brought forward that will mean the Pope will defend himself in court against allegations of covering up child abuse. This shows that the legal framework enables someone to bring such proceedings against arguably the most powerful religious leader in the world. We must ensure that victims and their families have the same recourse against ISKCON leaders and school staff. If an ISKCON yatra decides that they will permit a school to operate under its auspices or with their support, the local GBC, Temple President, gurus, sannyasis or any other person exercising significant influence over that provision, must be held legally accountable. We must not allow influence and power without corresponding accountability and responsibility. Child protection is something many leaders simply do not wish to engage with – if that's the case, then either don't get involved with a school (and if you are a TP or GBC, that means don't have a school under your jurisdiction) or simply step down and let someone else do the job.

Unfortunately, it seems that the only way leaders will take this responsibility seriously is if they are held personally liable. If you are dealing with children, or you have a significant role in enabling others to deal with children, you must be willing to put your neck on the line.

Clearly, there is no scenario that will guarantee that child abuse never happens in our institution. However, the onus on leaders is of course to ensure that we have done everything within our power to prevent it, and that if it does occur, we deal with it in the most honest and robust way possible.

Effective governance and clear lines of accountability are essential components in enabling that to be possible. Mandatory annual child protection audits should be commissioned for every school. These audits should be carried out by professionals not associated with ISKCON and their reports should be made public.

There is an obvious imperative to help victims and their families with spiritual, emotional, and material support. There is also an imperative to provide both remedial and punitive measures for the guilty. We are not yet experts in these matters within ISKCON and so the involvement of external agencies will likely be beneficial in guiding our response in this regard. For serious cases of abuse, including negligence, we should consider pursuing jail sentences. One element of essential support required for victims is in helping to bring their case forward with confidence that it will be dealt with fairly, that there will not be any repercussions for them from senior figures within ISKCON or 'friends' of the accused, and that they will be practically supported to navigate the respective police and court systems when bringing credible charges. ISKCON must be able to honestly provide such support and assurances. If that needs to be funded through a tax system in the negligent yatra, then so be it; a financial risk to local leaders will be no bad thing.

Unless we have these three things: direct legal accountability for anyone significantly influencing a school, annual child protection audits, and a well-resourced support system for victims, we will see this happen again. And again.

There are many other aspects that also need to be addressed, such as school policies, staff and student training, parent training, HR processes, curriculum etc. It is too much detail for the purposes of this letter but suffice to say, for now, that there are several ISKCON-friendly organisations that have the capacity to share best practice in these areas.

I recognise that the above level of accountability may be a step too far for some ISKCON leaders. Unfortunately, the fact that individuals often lack the political or financial clout to hold leaders to account has meant that too many ISKCON leaders have gotten away with severe derogations of duty. The above proposals aim to redress that. However, if the GBC is unwilling to make the necessary changes to adequately protect our children, it is inevitable that individual members of ISKCON will have no choice but to establish an independent mechanism that will force such a change – this will likely happen by offering privately funded and direct support to victims in order to bring charges against ISKCON leaders who have perpetrated abuse or those leaders who were informed of abuse but have turned a blind eye. It would be a real blemish

on our Society if such a mechanism had to be forced upon ISKCON instead of ISKCON embracing the required changes – but one way or another, it must be done.

Finally, given the systemic and repeated failures of child protection in ISKCON-run schools, and if ISKCON leadership does not have the wherewithal to lead on genuine school transformations and governance, the alternative would be for ISKCON to withdraw from running schools. This would be especially true for boarding schools because of their highly elevated child protection risks. As I write this, I have been made aware of ongoing peer-on-peer sexual abuse at a residential school associated with ISKCON and where ISKCON leadership seems to be yet again failing in their duty of care in addressing this problem. It is criminal to allow this to continue. On behalf of several other concerned devotees, I offer you our practical support to address this urgent matter and the associated institutional failures of leadership and governance.

Your servant,
Navina Krsna das

Annex 2

GBC Inquiry regarding Child Abuse at Sridham Mayapur and Vrindavan

Whereas, it has been brought to the attention of the GBC Body that there were lapses in the implementation of sufficient child protection measures in the ISKCON Mayapur and Vrindavan Schools;

Whereas, it is imperative to first identify, by way of an inquiry, the causes of such a lapse in the current governance and system setup for child protection and, subsequently, to put in place measures to avert such lapses from being repeated in the ISKCON Mayapur and Vrindavan schools;

Whereas, such an inquiry shall not preclude the formation or functioning of other committees with respect to improving child protection within ISKCON;

Resolved: That the GBC conducts an inquiry to identify the lapses in the implementation of child protection measures at ISKCON Mayapur and Vrindavan schools, details of which are set out below as follows:

1. Scope of enquiry:

1.1. This inquiry will be limited to ISKCON schools with specific focus on examining the their current organisational structures and legal frameworks required for child protection and to assess the current risks in respect of the same.

1.2. Identify the root causes of governance shortcomings in the ISKCON Mayapur gurukula by interviewing relevant members of the CPO, GBC Zonal Secretaries, Mayapur temple leadership, the current school leadership, and any other parties that may have been connected, directly or indirectly, to the ISKCON Mayapur Gurukula, review the documentation that governs the relationship between these entities and similarly review the governance arrangements and documentation for ISKCON Vrindavan gurukula.

1.3. Ascertain whether the governance shortcomings identified above are likely to be replicated across other ISKCON school settings; this will likely include wider interviews and documentation review.

1.4. Review the structural and legal relationship between the different layers of ISKCON with governance of schools and the CPO.

1.5. Ancillary to the above review will be the Inquiry's access to and study of the CPO Guidelines as they relate to scope as outlined in items 1.1-1.4

2. Desired Outcomes:

2.1. Phase one shall entail collating the findings of the Inquiry and making specific written recommendations to the GBC Body in order to remedy the identified shortcomings and areas of improvement for implementation by relevant bodies; and

2.2. Phase two will be supporting implementation of the adopted recommendations of the Inquiry.

2.2.1. Identifying qualified resources who could help implement the approved recommendations.

2.2.2. Commissioning mandatory annual child protection audits for every school. These audits should be carried out by professionals (with no conflict of interest) and their reports should be made public.

3. Proposed team:

3.1. Individuals with extensive school safeguarding and inspection experience will be appointed at the discretion of the inquiry coordinator.

3.2. The Avanti Schools' legal advisors are available for consultation where necessary

3.3. Other volunteers for management, communication and administration to support this process will be recruited as needed;

3.4. Navin Krishna Das will coordinate the inquiry;

3.5. An optional committee from GBC and India Bureau can be created at the outset to help facilitate the inquiry.

4. Funding: Navin Krishna Das has kindly agreed to raise the funding for the following:

4.1. Team consultation fees

4.2. Legal consultation fees

5. Timeline: First phase report is to be presented to the GBC Body within 8 weeks after whatever preliminary information is requested by the team is provided to them

6. **Action items:** Upon approval of the GBC Body, the following actions need to be completed

a. By and before 11th January 2023, GBC members on the India Bureau, headed by Gopal Krishna Maharaja, procure the India Bureau's formal resolution and commitment to support the completion of this inquiry;

b. By and before 18th January 2023, GBC Zonal secretaries (Jayapataka Swami, Gopal Krishna Goswami, Bhakti Purushottama Swami, Hrdaya Caitanya das and Anuttama das) and Indian Bureau representatives (Devakinandan das, Basu Ghosh das and Dayaram das) with authority over Mayapur must procure the Mayapur executive board (MEB) formal resolution and commitment to support the completion of this inquiry.

i. MEB resolution should include assigning a dedicated co-director to arrange and assure cooperation from the Mayapur management structure for the timely completion of the inquiry;

ii. The co-director should procure by 31st January 2023 the preliminary information stated below so that the formal inquiry can ensue.

c. By and before 18th January 2023, GBC Zonal secretaries and Indian Bureau representatives with authority over Vrindavan must procure the Vrindavan executive board (VEB) formal resolution and commitment to support the completion of this inquiry.

i. VEB resolution should include assigning the temple president to arrange and assure cooperation from the Mayapur management structure for the timely completion of the inquiry;

ii. The temple president should procure by 31st January 2023 the preliminary information stated below so that the formal inquiry can ensue.

Preliminary information

a. Provide a copy of all resolutions passed by the GBC body and local management with respect to child protection at these schools;

b. The existing CPO guidelines that needed to be adhered to at these centers;

c. Provide a copy of any scheme of delegation or legal or financial arrangement that connects the schools to ISKCON. This could be property leases, MOUs, management agreements, governing articles, and so on;

d. Provide a copy of the child protection, health and safety, whistleblowing, complaints, grievance policies that the school has adopted;

e. Provide a list of the names and contact details of the governors of the school and principal/ head teacher;

f. Provide a copy of any scheme of delegation or legal framework that sets out the relationship between the international CPO to the GBC body.

g. Provide a copy of any scheme of delegation or legal framework that sets out the relationship between the local CPT to the GBC body and to the international CPO.

h. Who owns the land and buildings upon which the school operates?

i. What is the legal entity that owns the school? Please provide the governing documents for this entity (articles of association and memorandum, trust document etc.).

j. What is the legal entity that operates the school? (If different from the owner). Please provide the governing documents for this entity (articles of association and memorandum, trust document etc.).

Annex 3

Usha Sahni BA PGCE MSc MA

Usha was a Senior Her Majesty's Inspector for 14 Years and held posts as one of the three Regional Directors, the Deputy Director for Early Years, and also responsible for Local Education Authorities' Annual Assessments that included Safeguarding and Education, Early Years and Primary Education, and Social Care provision. She was previously Education Director for Avanti Schools Trust. As a distinguished headteacher, she has served in many inner London schools and has made a strong contribution to national initiatives in raising standards for children from poorer backgrounds. Usha was a founding member of the National College for School Leadership, and a Board member for the University of London Institute of Education. Her experience includes leadership training and coaching for headteachers and teachers as a mentor, an external examiner and an assessor of the National Professional Qualification for Headship. Usha has an undergraduate degree in Psychology and a masters degree in Education & Management. In 1999, she was awarded an OBE for her Services to Education.

Dr James Biddulph BA PGCE MA MEd PhD FCCT FRSA

James gained Advanced Skills Teachers (AST) status in creativity and in 2003 was awarded Outstanding New Teacher of the Year for London. He is the inaugural Headteacher of the University of Cambridge Primary School, the first primary University Training School in the UK and is a founding fellow of the Chartered College of Teaching. James was founding Principal of Avanti's primary school in East London.