

Adam Luck Esq
Sunday Times

By email (luck_adamn@hotmail.com)

Dated 31 January 2014

Private and Confidential

Dear Sir

The Plymouth Brethren Christian Church and Jill Mytton

We act for the Plymouth Brethren Christian Church (PBCC).

We have been passed a copy of your email to Rod Buckley of our client, together with the enclosed list of 21 questions to which you have asked our client to respond. Answers to your specific questions appear in the attached Schedule. There are, however, a number of other important facts and matters to which we would draw to your attention:

- (1) The PBCC is a Christian church whose fundamental beliefs are shared by millions of Christians worldwide.
- (2) On 9 January 2014, the Charity Commission issued a formal decision to enter Preston Down Trust ("PDT"), one of the PBCC's gospel hall trusts, on its Register of Charities.
- (3) The Charity Commission concluded that PDT was a body established for a purpose set out in the Charities Act 2006 Act and had met the 'public benefit' requirement.
- (4) The Commission reached that decision having conducted exhaustive enquiries following the original application made by PDT's trustees on 18 February 2009. It is believed that amongst those to whom the Commission had spoken was Jill Mytton, a former member of the PBCC.

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- (5) The PBCC was aware that Ms Mytton was conducting research into alleged child sex abuse within their community and made several attempts to engage her in dialogue given the serious nature of what she was alleging. These efforts were all rejected.
- (6) As a direct result of that, the PBCC obtained reports from three distinguished independent academics to help it determine whether Ms Mytton's research into alleged child sex abuse within the PBCC (including her claim that it was running at a level of 26%) had any scientific validity.
- (7) Reports were commissioned from Dr K. V. Petrides (Reader in Psychology and Psychometrics, London Psychometric Laboratory, University College London), Professor Adrian Furnham (Professor of Psychology, also at UCL) and Professor Jane Hutton (Professor in Medical Statistics, University of Warwick).
- (8) In each instance, the individual concerned was instructed to consider Ms Mytton's methodology, including the framing of the subject of her research, the methods of recruitment, the construction of her questionnaire and the relevance (if any) of Ms Mytton's past. Each expert was provided with copies of Ms Mytton's detailed research questionnaire and some online materials prepared by Ms Mytton to solicit respondents for her research. It is understood that those materials have since been removed.
- (9) The three academics were instructed as expert witnesses and (as is normal) were paid a fee for their work.
- (10) None of the academics was shown any of the others' reports, yet each reached the same conclusion that Ms Mytton's research methodology was highly flawed.
- (11) Dr Petrides described Ms Mytton's recruitment methodology as '*unscientific*' and her stated objective of '*helping various agencies to provide protection to victims of cults and furnishing "hard evidence" of sexual abuse in the Brethren*' as seeming '*to fall within the remit of investigative journalism, social work, or law enforcement*' rather than research.
- (12) Professor Furnham's report included the following conclusions:

'Ms Mytton's recruitment materials indicate that the findings of her proposed research 'may call the leadership [of the Plymouth Brethren] to account and show them that there is a price to be paid for the abuses of their power'. This is a highly unprofessional statement. Hers is not a disinterested enquiry: it sounds like a witch-hunt under the guise of scientific research.'

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It is not too difficult to ascertain that she is a very unhappy, ex-member of a group that she wants to research; and that she wants to show that people are abused by that group. It appears much more like a journalistic approach to the issue and would in my experience not pass any ethics or research committee.

Ms Mytton deploys poorly constructed questionnaires with nearly all items being negatively framed. There should be a much better balance. Currently, there is no way of indicating that a Brethren experience was positive: only that it was (at best) 'not negative'.

(13) Professor Hutton's comments included the following:

'The study is said to be a world wide study which focuses on mental health. There are no explicit hypotheses to be tested, but there is an assumption that there have been abuses of power. The difference in meaning between a hypothesis and an assumption is usually that a study is open to evidence for or against a hypothesis, but not open to evidence against an assumption. Mytton's approach therefore appears to be unable to confirm or falsify her underlying statements about the Exclusive Brethren and, as such, is unscientific'....

'On the basis of the information available to me, I do not think the quality of the study, or studies, which Ms Mytton has carried out is likely to be adequate to support any conclusions [about child sex abuse] with regard to members, or former members, of the Exclusive Brethren'.

(14) Prior to the decision of the Charity Commission on 9 January 2014, it had been understood that Ms Mytton was to be a witness at the proposed hearing before the Charity Tribunal. Had that come to pass, each of the academics quoted above had agreed, if necessary, to appear as an expert witness to explain why Ms Mytton's research was deficient in their opinion.

In summary, many of your questions are loaded and have plainly been sourced from Ms Mytton. As demonstrated above, she cannot be regarded as a reliable source. It follows that any article by the *Sunday Times* suggesting rampant child sex abuse amongst members of the PBCC would be false, misleading, fail to comply with accepted standards of responsible journalism and be contrary to paragraph 1(i) of the Press Complaints Commission's Code. Any such article would therefore be followed immediately by a formal complaint to the PCC seeking the remedy provided by paragraph 1(ii) of the Code.

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Yours faithfully

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