



COMECE Secretariat contribution

**ProSPeReS Consortium WP3 Workshop
The Hague, 26 October 2022**

1. Comments on the Workshop materials

[Document D 3.2 - Security by design guidebook for religious sites](#)

In general, the document is extremely useful and detailed.

As rightly highlighted, **a number of places of worship are historical**, so in such cases it is not possible to implement security approaches at the design stage (page 10).

It is very important to preserve the **open, accessible and welcoming nature** of places of worship in the context of security measures (page 10): places of worship present a marked specificity compared to all other public places/buildings (extremely soft targets and uniquely vulnerable due to unrestricted, unguarded and free access). Preserving the element of welcome and openness is essential for these buildings to perform their role (i.e. need to balance security and welcome). Maximum fruition is crucial for places of worship.

On **security culture and security awareness** (page 13) COMECE would highlight that the Covid-19 pandemic, with its strict (and at times disproportionate) limitations of access to places of worship, has greatly increased the skills and attentiveness on security matters within parishes and dioceses. The Church in every Member State developed guidance and protocols on how to ensure safety and compliance with sanitary standards and this has created a new and more proactive approach, which can easily translate to the different area of protection of places of worship.

On **CCTV cameras** (pages 70 and ff.) the Church is very aware of GDPR compliance and considers essential to adhere to the principle of data minimisation.

In its **contribution to the EU Quick Guide**, COMECE underlined that *"...a sufficiently high definition/quality of images should be ensured for CCTV. Moreover, video cameras should be placed in positions where they cannot be easily de-activated. In our view, in any case, CCTV it is important to assess whether such tools should have a primary or auxiliary function with respect to physical vigilance, alarms"*.

Location of videocameras is an important aspect in our view and we welcome the references to ensuring quality over quantity in their use (page 71); and to proper placement of cameras to avoid creating a sense of surveillance (page 72). The Church is not in favour of a 'securitisation of worship'.

Concerning the **use of physical barriers** (pages 77 and ff.) already in our November 2019 contribution to the European Commission, we highlighted the importance of promoting the use of inconspicuous/non-intrusive security solutions (e.g. welcoming committees as a way to monitor suspicious behavior/persons; decorative elements to ensure perimeter security). This is reflected in the *ProSPeReS* document, where it is stated that solutions, including barriers, should be minimally invasive (page 12).

[Document Task 3.3 - Set of procedures to prevent, protect, detect, respond, mitigate results](#)

In this document, one of the key parts from the point of view of COMECE is the 'GUIDE for developing a Welcome Team' (pages 14-15).

The tool of **Welcome Teams** is important, considering that for the Church it is key to preserve the welcoming/open nature of worship sites without security measures excessively impinging on it. The open and welcoming ethos and culture of places of worship is rightly highlighted at page 14 and we are pleased to see it reflected also in other *ProSPeReS* materials (cf. the document *Overview of task WP 3.4 --Preparing recommendations for equipment – monitoring, detection and protection*).

The aspect of **sound selection of volunteers and members of Welcome Teams** is also crucial. As we stressed in our contributions to the European Commission in 2019: "*Background checks should be carried out on employees and volunteers*".

Of course, **Welcome Teams** can only have a **complementary role** and cannot be the only solution to security threats.

The references made at page 6 to **Simplicity** (which also requires *concision*) and to **Scalability** (as many places of worship are not 'large') are important.

With regard to '**incident managers**' (pages 8 and ff.), in the case of the Catholic Church, **Canon Law** should be taken into account, as:

- Can. 515 §1 states that "*A parish is a certain community of the Christian faithful stably constituted in a particular church, whose pastoral care is entrusted to a pastor (parochus) as its proper pastor (pastor) under the authority of the diocesan bishop*";
- Can. 532 adds that "*In all juridic affairs the pastor represents the parish according to the norm of law. He is to take care that the goods of the parish are administered according to the norm of cann. 1281-1288*".

This also applies to the reference to incident managers in the document *Description of activity 3.5 - Preparing protocols for communication and cooperation with public services*.

[Other general comments on the materials](#)

The *ProSPeReS* materials **amplify** in a high-level manner the requirements and needs sketched out in the EU **Quick Guide** concerning the matter.

It is also important to **protect Churches and religious communities from actors that have an economic interest** in the field and that wish to profit from their (real or perceived) need for security measures.

2. General remarks on the project and EU actions in the field

In general, COMECE greatly appreciates the work of *ProSPeReS* and is honoured to be involved in its activities.

COMECE welcomes *ProSPeReS'* **focus not only on acts of terrorism**, but also, more broadly, on the security of worshippers/systems to ensure it. We would support the **future broadening of the scope of EU action**: safety of places of worship should not be reduced to terrorism (instances of vandalism, violence, profanations, disruptions of assemblies, defacing, arson, harassment, acts of malevolence etc. are not related to terrorism, but have to be prevented/tackled).

On protection of places of worship, we appreciate the EU prioritisation of the dossier and the inclusiveness towards religions. However, we have noticed the EU's reluctance to showcase the link with the full exercise of freedom of religion. COMECE stresses that **protecting places of worship is important not just for security reasons or for their symbolic value, but especially and most importantly in view of safeguarding freedom of religion**, which is primarily exercised in such places.

This element has also been **highlighted by Pope Francis** during his Audience with the Diplomatic Corps accredited to the Holy See for the presentation of wishes for the New Year (08.02.2021): "*I would like to stress that the protection of places of worship is a direct consequence of the defence of freedom of thought, conscience and religion, and is a duty incumbent upon the civil authorities, regardless of their political persuasion or religious affiliation*". This element should be **better integrated in EU actions**, including the EU Quick Guide.

The **EU Quick Guide** is a **good first step**, but the Catholic Church is ready to further contribute to its **necessary enrichment and improvement**.

As in other contexts (e.g. non-discrimination) the issue should **not be shaped within a "religious minorities" framework**, as the phenomenon affects both majorities and minorities similarly.

*Brussels, 24 October 2022,
COMECE Secretariat*