# Quakers in Britain response

## About us

Quakers in Britain are a faith group committed to equality, justice and peace. Our national church and charity represents 21,575 people who attend Quaker meetings in England, Scotland and Wales. The Yearly Meeting of the Religious Society of Friends (Quakers) in Britain (known as Britain Yearly Meeting) is an umbrella body for the 70 registered or excepted charities which are legally responsible for Quaker meetings at local and regional level.

There are 475 local Quaker meetings in Britain, some of which have buildings and some of which do not. Some meetings are large; they employ staff and hire out their meeting rooms as venues. Other meetings are tiny, with a handful of people who attend weekly meetings for worship.

Britain Yearly Meeting has a trading subsidiary, the Quiet Company, which runs venues at Friends House in London and Swarthmoor Hall in Cumbria.

## Overview of our response

We believe that the proposals are unnecessary and incompatible with Quaker faith and practice. They are disproportionately burdensome and are not conducive to enabling people to fulfil their human rights and civil liberties, particularly the right to freedom of religion. We find that the proposals in the consultation document and appendices are too vague for us to know their full implications.

## Responses to individual questions

### Venues and organisations owning, operating or responsible for publicly accessible locations should take appropriate and proportionate measures to protect the public from attacks in these locations.

Agree (A), but we do not have enough detail to understand what the government sees as ‘appropriate and proportionate’, and we believe current measures are sufficient to enable this to happen.

### Venues and organisations owning, operating or responsible for publicly accessible locations should prepare their staff to respond appropriately in the event of a terrorist attack to best protect themselves and any members of the public present.

Agree (A)

### We propose that a targeted Protect Duty applies only to certain public venues. What criteria would best determine which venues a Duty should apply to?

Part of the problem with these proposals is that it is difficult to set such criteria, because there are a range of factors that will affect a venue’s vulnerability to terrorism and other forms of crime. Capacity is one, but many places of worship have large capacities but only small numbers of worshippers and visitors. The capacity may be spread across several rooms, which decreases the likelihood of the venue being a target for attacks.

Quakers have no paid clergy and usually everyone present at Meeting for Worship on a Sunday morning is a volunteer. There is no guarantee that a Trustee or other voluntary office holder will even be present. A focus on capacity only could mean that large Quaker meeting houses with few people in attendance have to manage security measures that are totally inappropriate to the activities taking place there.

The location (rural or urban), visibility, purpose, popularity and usage of the venue are relevant alongside capacity. On balance, staffing levels may be the most accurate criteria if the government decides to pursue these proposals.

### We propose that a requirement to consider security and implement appropriate mitigations at a venue should fall to the owner and/or operator of the venue. Do you consider this appropriate?

Many Quaker meeting houses are owned by a charity and run by volunteers. Trustees and other volunteers in small charities already face a large bureaucratic burden and we ask that the government consider the implications of this. These charities and their volunteers should not have to incur disproportionate cost, time commitments or risk of prosecution as a result of any new measures. Apart from the actual impact this could have, the perceived impact may discourage people from taking on voluntary roles in places of worship, which may result in those places of worship having to close.

### Are you clear about whether your organisation falls within the scope of the definition of a ‘publicly accessible location’ (a place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission)?

Y – We are clear that Quaker meeting houses fall within the scope of ‘publicly accessible location’.

### Are there any other issues regarding who legislation should apply to that you would like to offer views on?

The public have a right to access Quaker meeting houses as places of worship. Places of worship have a duty to enable everyone to fulfil their human right to freedom of religion. This means that we have a duty to enable everyone to access our spaces. We must do everything we can to enable people to participate in worship and mitigate any possible risk they might pose to others in doing so.

**We have answered questions 16–25 from the perspective of Friends House in London, where we have our head office and we operate a venue.**

### Does your organisation currently undertake a risk assessment for terrorism?

Y – as part of our overall security risk assessment.

### Is this process undertaken by an in-house or an externally appointed individual?

External – health and safety consultant.

### When you do undertake a terrorism risk assessment, how many working days a year do you estimate your organisation typically spend on this task?

3 days

### How frequently does your organisation typically review this risk assessment?

e. Other
We commissioned a security risk assessment which addressed terrorism 3 years ago for the first time and we will repeat the process shortly.

### What mitigations against terrorism risks does your organisation currently undertake (select all that apply)?

d. Personnel security policies and procedures consider security risks

e. Site/location vulnerabilities (to terrorist threats) and appropriate physical mitigations are considered

I. Liaison with police or other resource (e.g. security consultant) on threats and appropriate security measures

j. Involved in local security initiatives

### What are the existing activities and mechanisms which you consider result in the best protective security and organisational preparedness outcomes at public spaces (select all that apply)?

b. Staff awareness raising and training courses

### Do you have any additional proposals to put forward which could improve security at public spaces?

Quakers are committed to equality and peace. We believe in tackling the root causes of insecurity rather than the symptoms. These causes include government foreign policy, inequality and injustice. These can be addressed by: peacebuilding in the UK and abroad; investment in international development; and investment in public services.

We believe the proposed measures are part of a creeping securitisation of society.

We do not believe that you make people safer by creating a climate of fear and suspicion. Security measures should be unobtrusive. They should focus on training staff and volunteers to be alert for certain types of behaviour and to deal with suspicious behaviour in a way that avoids unnecessary conflict and does not discriminate against marginalised groups.

The Board of Deputies of British Jews established a commission on racial inclusivity in the Jewish community in 2020. Its recent [report](https://www.bod.org.uk/wp-content/uploads/2021/04/Commission-on-Racial-Inclusivity-in-the-Jewish-Community.pdf) said that “security was among the more frequently raised of all the concerns the Commission heard.” The testimonies in the report evidence that places of worship are not immune from the trend for tougher security and policing measures to have a disproportionate, negative effect on minority communities. We urge the government to consider this as an important unintended consequence of its proposals.

### Compliance with a Protect Duty would require greater effort (e.g. time, staff resource) than compliance for comparable legal and other obligations (e.g. fire safety, health and safety, Licensing Act 2003 guidance, licensing for sports grounds, Safety Advisory Groups)?

Agree (A)

### How do you think these new requirements/mitigations will affect:

1. **Number of customers/visitors visiting venues in scope of the duty?**Decrease – these measures have the potential to stop places of worship being so welcoming and contribute to our already-dwindling numbers of worshippers.
2. **The public’s perception of the terrorist threat?**Increase – these measures will increase fear and suspicion.
3. **Vigilance of the workforce/use of good security behaviours by staff**?
We believe these measures could increase staff’s vigilance but are not conducive to good security behaviours by staff, as they emphasise suspicion rather than enabling people to fulfil their human right to freedom of religion.

### Are there any other issues regarding *what* parties within the scope of a Protect Duty should be required to do that you would like to offer views on?

The UK state has a duty to protect its citizens by creating an environment in which people do not feel compelled to harm others in society. While churches and charities can take responsibility for having some preventative measures and mitigations in place, they should not be put in a position where they could be fined or sued for failing to take precautions where the state has failed in that duty. There must be a clear definition of what are considered ‘reasonable’ precautions for venues to take, to protect trustees from incurring civil liability.

If additional measures and responsibilities are imposed, there must also be support for churches and charities in implementing them. Any new measures will need to be implemented in a way that is compatible with equality legislation. This can be a difficult line to walk even for experienced public bodies. Trustees need to be assisted to ensure they do not inadvertently leave themselves open to civil claims from the public.

### How can an inspection regime best be used to support improvements to security culture and practices?

We hope that an inspection regime would be collaborative – pointing out how meeting houses could improve security culture and practices, and providing guidance on how to do so. We also hope that inspectors would recognise the different circumstances of different venues, and adjust their expectations accordingly. This would be like what currently happens with fire safety officers when they inspect our premises.

### What are your views on the use of civil penalties (fines) for organisations who persistently fail to take reasonable steps to reduce the potential impact of attacks associated with ensuring compliance with a Protect Duty?

We believe the punitive measures should be avoided, and that the focus should be on enabling organisations to comply with the regulations.

### Do you currently access Government advice (primarily from Counter Terrorism Policing and the Centre for the Protection of National Infrastructure) regarding threat, protective security and preparedness?

N

### Why do you not currently access this advice and guidance?

e. Other
We have accessed Government advice in the past and have every intention to do so in future and when circumstances allow.

### What would you find most useful to help you to comply with a Protect Duty (select all that apply)?

a. A single, digital service where you could access relevant material, advice and training in one place

### Counter-Terrorism Policing are working with Government and the Private Sector to design a digital service to provide access to relevant counter-terrorism material, advice and training in one place for organisations operating in publicly accessible locations. Do you anticipate that you would access counter terrorism information through this service if it were available to you?

Y

### What would you most likely use this kind of service for (tick all that apply)?

a. To get general updates on how the terrorism risk is changing

b. To support business planning activities

c. To understand what risk management activities you need to do

d. To access CT training

e. To connect with other organisations to discuss counter terrorism

f. To understand what to do after an incident

g. Reporting of suspected terrorist activity/concerns

### To support the provision of high-quality advice and guidance from private sector security professionals providing counter terrorism security advice, Government should consider (tick all that apply)

a. Government supported standards for Counter Terrorism (CT) risk assessments and advice

b. Qualifications / Accredited training for individual professionals

c. Government supported ‘approved contractors scheme’

d. Regulation of CT consultants

### What advice and support would be required for organisations and venues within the scope of Protect Duty?

If a Protect Duty is introduced, Quaker meeting houses would need detailed but accessible advice to enable them to understand whether they fall under the scope of the duty and how to comply with it if they do.