Foreign Participants in Spiritual Communities: Police Operations, Peaceful Assembly and Access to Remedies in France

Practitioners affected by the November 2023 police operation in France

Contribution to the Special Rapporteur on the rights to freedom of peaceful assembly and of association

Call for input on People on the Move and FoAA rights | Questions II.1, II.5, II.10 and II.11

Coordination of Associations and Individuals for Freedom of Conscience

CAP Liberté de Conscience

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1. Temporary foreign participants are rights holders

On 28 November 2023, people staying in houses and apartments used for yoga and meditation retreats in the Paris region and Nice were subjected to a coordinated police operation. Many were Romanian practitioners. Some subsequently returned to Romania or travelled to other countries, while others remained in France. This contribution addresses their experience as people who had gathered for peaceful spiritual practice and who then had to communicate, organize their departure and seek documents or restitution across borders.[1]

The contribution examines the safeguards owed to every person affected by searches, police custody, interrogations and seizures, including people who were not charged and people whose procedural status was unclear to them. Spiritual affiliation must not replace an individual assessment of conduct and rights.

The call for input expressly includes any other persons or groups exercising assembly and association rights in the context of human mobility. The examples presented here concern temporary international mobility and involve no assertion about the migration status of the participants. Their rights do not depend on French citizenship, permanent residence or a particular administrative category.[2]

Articles 21 and 22 of the International Covenant on Civil and Political Rights protect peaceful assembly and association. The Human Rights Committee has confirmed that these rights belong to citizens and non citizens alike, extend to indoor and private gatherings and may cover religious activities involving expression, exchange, solidarity or group identity. Freedom of association also protects collective action. Official decisions restricting assembly rights must remain open to legal challenge.[3]

This contribution draws primarily on published interviews and research by Human Rights Without Frontiers, read alongside the academic study of Susan J. Palmer and official standards. CAP Liberté de Conscience has also received 91 declarations and a collective memorandum dated 26 January 2026. The examples below preserve the anonymity used in the published interviews.[4]

2. Spiritual retreats involve protected collective activity

Voluntary participation and repeated stays

Human Rights Without Frontiers describes informal spiritual and meditation retreats held in villas or apartments made available free of charge. Its interviewees stated that they had come voluntarily and by their own means. Other interviewees described returning for a second or third stay, sometimes accompanied by a husband or partner.[5]

At Villiers sur Marne, C.C. reported participating in such retreats in France since 2010. She had planned to remain for two months, from late September to late November 2023. Her account describes dozens of practitioners accommodated at the premises, a large room for collective yoga practice,

[1]Human Rights Without Frontiers, Police raids on Romanian yoga centers, one year later, 23 November 2024; Susan J. Palmer, The Police Raids Against MISA in France, November 28, 2023, The Journal of CESNUR, volume 8, number 2, pages 89 to 110. Human Rights Without Frontiers Academic study

[2]Special Rapporteur on the rights to freedom of peaceful assembly and of association, call for input for the 2027 reports, scope of People on the Move and FoAA rights, including any other persons or groups exercising these rights in the context of human mobility. Official call for input

[3]International Covenant on Civil and Political Rights, articles 2, 21 and 22; Human Rights Committee, General Comment No. 37, CCPR/C/GC/37, paragraphs 5, 6, 12, 99 and 100. Covenant text General Comment No. 37

[4]Human Rights Without Frontiers, investigation based on approximately 20 interviews, 19 August 2024; collective memorandum and 91 declarations supplied to CAP Liberté de Conscience. Human Rights Without Frontiers investigation

[5]Human Rights Without Frontiers, investigation of 19 August 2024; Human Rights Without Frontiers, article of 27 January 2026 reporting interviews with approximately 20 women. Investigation Further interviews

shared bedrooms, a communal kitchen and the possibility of individual meditation in a small pavilion. The gathering therefore combined collective practice, shared daily life and individual spiritual exercise.[6]

A.D. reported several stays at Vitry sur Seine over a period of ten years. On this occasion, she arrived by plane from Denmark after spending time at a yoga center there. She had not fixed the length of her stay and envisaged remaining for one month or more. Palmer's research, based on 25 interviews including 14 people present during the operation, likewise records voluntary stays and different destinations after release.[7]

These accounts respond to question II.1. The participants were not merely present in the same premises. They gathered for shared spiritual purposes and maintained relationships across repeated stays and national borders. The legal assessment should therefore consider the collective dimension of their activity, regardless of whether it was informal or took place in private homes.

Seizures affect communication and organization

Human Rights Without Frontiers reports that telephones, computers and money were seized and that the interviewees concerned received no receipts. C.C. reported the seizure of her bags, papers, telephone, tablet, computer and cash. She stated that her money and equipment had not been returned four months later and that she had received neither an inventory of the seized property nor a copy of the release form.[8]

The experiences were not uniform. At Vitry sur Seine, A.D. stated that the premises had not been sealed and that released persons could return. Her own telephone and computer had not been discovered. This variation reinforces the need for individual justification, precise records and a specific assessment of each interference rather than assumptions about an entire community.[9]

The Human Rights Committee recognizes that communications technologies often play an integral role in organizing and participating in physical gatherings and that interference with such communications can impede assemblies. Information gathering and the collection, sharing, retention and access to data must conform to international standards and must not create a chilling effect.[10]

During a temporary retreat, telephones and computers can connect participants with one another, with their families and with the organizers of future gatherings. Their seizure has therefore an assembly and association dimension, alongside its implications for privacy and property. The disruption continues when a person released without a telephone or money cannot readily contact other participants or arrange a safe departure. C.C. reported waiting outside the police station for hours before obtaining assistance, while Palmer recorded participants contacting relatives in Romania who purchased return tickets.[11]

[6]Human Rights Without Frontiers, interview with C.C. concerning Villiers sur Marne, 16 April 2024. Interview with C.C.

[7]Human Rights Without Frontiers, interview with A.D. concerning Vitry sur Seine, 29 June 2024; Susan J. Palmer, cited study, methodology and accounts of destinations after release. Interview with A.D. Academic study

[8]Human Rights Without Frontiers, investigation of 19 August 2024 and interview with C.C. of 16 April 2024. Investigation Interview with C.C.

[9]Human Rights Without Frontiers, interview with A.D., 29 June 2024. Interview with A.D.

[10]Human Rights Committee, General Comment No. 37, CCPR/C/GC/37, paragraphs 10, 61 and 62. General Comment No. 37

[11]Human Rights Without Frontiers, interview with C.C., 16 April 2024; Susan J. Palmer, cited study, section on release from police custody. Interview with C.C. Academic study

3. Effective rights must continue after departure

Human Rights Without Frontiers reports that most of its interviewees did not speak French. It also states that none received a copy of the record of their interrogation and that those who returned abroad were not subsequently contacted by the French authorities. These accounts respond to question II.5 by identifying barriers that combine language, documentation, distance and the loss of means of communication.[12]

French law provides important procedural safeguards, including information in a language understood, interpretation when necessary and access to specified custody documents. It also provides procedures for seeking the restitution of property, with the competent authority and available challenge depending on the stage of the proceedings. The practical issue is whether affected persons receive sufficiently clear records, contacts and explanations to use these safeguards after leaving France.[13]

Departure should not create procedural invisibility. A participant abroad may need an itemized seizure record, information about copied data, the identity of the authority holding the property, the applicable time limits and a means of submitting a request through counsel or another accessible channel. Article 2 of the Covenant requires an effective remedy, while General Comment No. 37 requires official restrictions on assembly rights to remain open to legal challenge.[14]

These measures would also protect legitimate investigations. Clear inventories, documented decisions and accessible contacts reduce uncertainty, preserve confidence and allow disputes to be resolved on an individual basis. They are therefore safeguards for both the participants and the integrity of the proceedings.

4. Law enforcement should facilitate peaceful collective life

Question II.11 calls for law enforcement capacities that facilitate freedom of peaceful assembly. In operations affecting spiritual communities, this requires recognition that a single location may accommodate suspects, alleged victims, witnesses and participants who are not charged. Each status and each measure must be assessed individually, without assigning criminality or victimhood through affiliation.

Training should cover the rights of non citizens, assemblies in private and indoor settings, the religious dimension of collective practice, competent interpretation, the assembly function of communications and the specific difficulties faced after a participant leaves the country. Planning and review should identify less intrusive alternatives where collective spiritual activity, premises or communications may be affected.

The Special Rapporteur has warned that stigmatization, including when unintentional, can effectively deny assembly and association rights and produce severe and lasting chilling effects. Law enforcement communication should accordingly distinguish alleged individual conduct from the peaceful activities of other participants.[15]

[12]Human Rights Without Frontiers, investigation of 19 August 2024, findings concerning language, interrogation records and contact after return abroad. Human Rights Without Frontiers investigation

[13]French Code of Criminal Procedure, articles 63-1 and 63-4-1; Ministry of Justice, circular JUSD1412016C of 30 May 2014; National Bar Council, overview of restitution procedures under articles 41-4 and 99. Ministry of Justice circular National Bar Council

[14]International Covenant on Civil and Political Rights, article 2; Human Rights Committee, General Comment No. 37, CCPR/C/GC/37, paragraph 99. Covenant text General Comment No. 37

[15]Special Rapporteur on the rights to freedom of peaceful assembly and of association, A/79/263, paragraphs 11 and 14. United Nations report

An independent review of the November 2023 operation should compare declarations with warrants, custody registers, rights notifications, interpreter assignments, seizure inventories and restitution records. It should include people who were not charged and people now abroad, and publish appropriately anonymized findings concerning the facilitation of peaceful collective activity.

5. Recommendations

1. Recognize expressly that citizens and non citizens, including temporary foreign participants, enjoy the rights protected by articles 21 and 22 during private and indoor spiritual retreats and through associated communications.
2. Include an assembly and association assessment in the planning, authorization and review of police operations affecting premises used for collective spiritual practice. Individualize every measure and consider less intrusive alternatives.
3. Avoid unnecessary interference with peaceful collective activities and preserve access to premises where no specific lawful justification requires a restriction.
4. When devices, documents or money are seized, provide an itemized receipt in a language understood, record copied data, review retention regularly and ensure prompt restitution when property is no longer necessary, regardless of the person’s current residence.
5. Guarantee competent interpretation, legal assistance and access to consular contact for foreign nationals, together with clear information about procedural status, available documents, remedies, time limits and responsible authorities.
6. Enable persons abroad to communicate with the competent authority, act through counsel, submit restitution requests and challenges, and receive notifications by effective means under the applicable law.
7. Request an independent review of the November 2023 operation that addresses its effects on peaceful assembly and association, and incorporate appropriately anonymized findings into law enforcement training and public guidance.