

Article

Religion in State Schools: Questioning, Rationale and Challenges in Spanish Law

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Abstract

In recent decades, Spain has witnessed a social and political debate regarding the justification and/or appropriateness of religious education in state schools. In this paper, after providing a brief description of the current situation, I will refer to the doubts and questions that have been raised about this area of teaching, as well as its legal basis and the social function it can perform. Finally, I will address some of the aspects or difficulties involved in its provision.

Keywords: religious education; neutrality of state schools; autonomy of religious denominations; religious education teachers

1. Current Situation of Religious Education in State Schools in Spain

Currently in Spain, Catholic, Evangelical and Islamic religious education is provided in state schools¹. This opportunity, which was traditionally reserved exclusively for the Catholic Church, as guaranteed in the Agreements with the Holy See², was opened up in our country to minority faiths that signed a cooperation agreement with the State in 1992³; that is, to Evangelicals, Jews and Muslims, although Jews have not yet taken advantage of this opportunity⁴.

Catholic religion is compulsory in schools and voluntary for pupils⁵. As for Evangelical and Islamic religions, the public administration will cover the costs when requested to do so by at least ten students, with the possibility of grouping pupils from different classes within the same educational stage. Students who do not choose to take religion classes (Catholic, Evangelical, or Islamic) take an alternative subject whose content has been modified according to various education laws⁶. The option to study religion or the alternative subject shall not, under any circumstances, lead to discrimination against students.

With regard to the current statistical data, the following Tables 1–3 serve as illustrations.

(a) Teaching of the Catholic religion:



Academic Editor: Daniela Tarantino

Received: 9 October 2025

Revised: 18 November 2025

Accepted: 19 November 2025

Published: 25 November 2025

Citation: Combalía, Zoila. 2025.

Religion in State Schools: Questioning, Rationale and Challenges in Spanish Law. *Religions* 16: 1489. <https://doi.org/10.3390/rel16121489>

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Table 1. Student Who Choose Catholic Religion as a Subject Statistical Data for the 2024.25 Academic Year.

Students Who Choose Catholic Religion as a Subject. Statistical Data for the 2024/25 Academic Year Source: Commission for Education and Culture of the Spanish Episcopal Conference. Office of Statistics and Sociology			
Students	Enrolled in Catholic Religion	Total	% Enrolled in Catholic Religion
<i>Early childhood education</i>	264,244	603,259	43.80%
<i>Primary education</i>	733,350	1,551,791	47.26%
<i>Compulsory secondary education</i>	436,837	1,094,357	39.92%
<i>Upper secondary education</i>	122,440	383,537	31.92%
TOTAL	1,556,871	3,632,944	42.85%

Students who choose Catholic religion as a subject in public schools represent 42.85% of the total student body, with high school students being the least likely to choose this subject.

- (b) According to data from the Andalusi Observatory, there are a total of 386,070 Muslim students who choose to study Islamic religion in public schools, of whom 85% do not have access to this subject. This suggests that approximately 15% take the subject, which would be an estimated 57,900 students. There are 311 teachers.

Table 2. Islamic religion data.

Islamic Religion Data Source: Observatorio Andalusi ¹ (2024)	
<i>Number of students</i>	57,900
<i>Number of teachers</i>	311
<i>Autonomous communities offering it in primary and secondary education</i>	10 (Andalusia, Aragon, Ceuta, Melilla, Castile and Leon, Catalonia, Extremadura, Madrid, Murcia, and La Rioja)
<i>Autonomous communities offering it only in primary education</i>	5 (Canary Islands, Balearic Islands, Castile-La Mancha, Basque Country, and Valencia)
<i>Autonomous communities not offering it</i>	4 (Asturias, Cantabria, Galicia, and Navarre) ²

¹ The Andalusi Observatory is an institution of the Union of Islamic Communities of Spain (UCIDE), one of the two major federations that make up the Islamic Commission of Spain (CIE), which is dedicated to observing and monitoring the situation of the Muslim population in Spain and Islamophobia. Its main task is to carry out demographic studies and analyze legislation and agreements relevant to Islam in Spain. See <http://observatorio.hispanomuslim.es/> (accessed on 6 October 2025). ² Mohamed points out that of the four autonomous communities with jurisdiction over education that do not yet offer Islamic religious education, only two justify this by citing a lack of student density (Galicia and Asturias); the others lack the political will to address the issue (Mohamed 2025, p. 67).

- (c) Regarding the teaching of evangelical religion⁷, the following data is noted:

Table 3. Evangelical Religion Data.

Evangelical Religion Data	
Source: Observatorio del Pluralismo Religioso ¹ (2022–2023 Academic Year)	
<i>Number of students</i>	9184
<i>Number of teachers</i>	141
<i>Educational institutions</i>	611

¹ The Observatory was created in 2011 on the initiative of the Ministry of Justice, the Spanish Federation of Municipalities and Provinces and the Pluralism and Coexistence Foundation, in compliance with Measure 71 of the *Spanish Government's 2008–2011 Human Rights Plan* and with the aim of guiding public Administrations in the implementation of management models in line with constitutional principles and the regulatory framework governing the exercise of religious freedom in Spain. Without changing its ultimate objective, in 2021, the Observatory began embarking on a new phase in which data production and analysis will take on a more prominent role. See <https://www.observatorioreligion.es/> (accessed on 6 October 2025).

Finally, it should be noted that, despite religious education being legally provided for, some public administrations have hindered its implementation, and this has been detrimental to parents who are unable to exercise their right to choose religious and moral education for their children in accordance with their convictions (article 27.3 of the Spanish Constitution)⁸. Specifically, among the difficulties that the religious denominations have identified in teaching this subject, all three complain, in general terms, about the lack of information for parents and students on the registration forms of many educational centers regarding the possibility of studying religion. They also point out that, even when parents manage to make the request, it is not uncommon, in the case of the Evangelical and Muslim religions, for the requests to go unanswered by the regional ministries⁹. Even when a teacher is appointed, there have been cases where school authorities have created obstacles due to the difficulties involved in planning with regard to this subject—for example, in organizing timetables—as it is an optional subject and sometimes brings together students from different grades. The Catholic Church has also detected obstacles on the part of some autonomous communities to the teaching of the subject in accordance with the terms of the regulations, which in some cases have resulted in convictions by the courts.

2. Questioning the Teaching of Religion from a “Secularist” Perspective: Two Different Ways of Understanding Neutrality

It is not unusual to hear voices that perceive religious education in Spain as a rarity, the result of past eras of Catholic confessionalism of the state¹⁰. For this reason, it may be instructive to take a look at what is happening in other European countries¹¹. To this end, an overview of religious education in the European Union countries is provided in Table 4.

Table 4. Religion Is Taught in State Schools.

Religion Is Taught in State Schools			Not Offered
Compulsory (Possibility of Exemption or Dispensation)	Free Choice		
	-	Belgium	- France (except Alsace and Moselle) - Slovenia
	-	Bulgaria	
	-	Croatia	
- Austria	-	Czech Republic	
- Cyprus	-	Estonia	
- Denmark	-	Hungary	
- Finland	-	Ireland	
- Germany	-	Italy	
- Greece	-	Latvia	
- Luxembourg	-	Lithuania	
- Malta	-	Netherlands	
- Romania (primary)	-	Poland	
- Sweden	-	Portugal	
	-	Romania (secondary education)	
	-	Slovakia	
	-	Spain	

The data obtained shows that what is unusual in our cultural sphere is not that religion is taught—on a voluntary basis—in state schools, but rather that it is not taught, as this is the case in only two countries: France (with the exception of Alsace and Moselle) and Slovenia. As González-Varas has stated, “our country, therefore, is not an exotic island where a series of subjects are taught that are not explained in any other country, nor are they incompatible with any principle of today’s democracies, such as secularism or the neutrality of public schools”¹².

On the other hand, focusing on international organizations, it can be seen that in recent years there has been a shift from considering religion a “private matter” and advocating for a “religion-free school” to insisting on the importance of religious education and knowledge in schools for social cohesion and coexistence¹³.

Once it has been emphasized that the presence of religion is not a phenomenon peculiar to our country, but rather one that is widespread throughout Europe and recommended by international organizations, the question that some people ask is whether this area of teaching is compatible with the neutrality that should characterize public schools.

The answer to this question leads us to clarify the coexistence of two different ways of understanding secularism or neutrality. One would lead, in favor of religious neutrality, to excluding the presence of religion from the social landscape and keeping it solely in the private sphere (the home, conscience, and places of worship). Alongside this conception, there is another way of understanding neutrality that does not lead to exclusion, but rather to the inclusion of religion, defining neutrality as the normalization of the presence of diversity of beliefs in society—always, of course, within the bounds of public order protected by law. This second conception emphasizes that it is public powers and institutions that are secular, not the citizens who turn to them¹⁴. Moreover, the neutrality of a public institution—in this case, the school—means that there is room for everyone, regardless of their beliefs¹⁵. The school does not take a position on religious matters so that citizens can express themselves freely and equally; a school should be open to everyone and to all beliefs.

The United Nations Rapporteur refers to the existence of these two different ways of understanding secularism and neutrality—inclusive of diversity or exclusive of religion in the social landscape—in a thought-provoking report on religious discrimination in the workplace, stating that “in the context of freedom of religion or belief the term neutrality can have very different meanings. It can sometimes be a proxy for a policy of non-commitment towards, and non-recognition of religious or belief diversity and can even lead to rather restrictive measures in this area. Unfortunately, there are examples of unreasonably restrictive readings of neutrality within both public institutions and the private sector. By contrast, neutrality can also represent a policy of fair inclusion of people of diverse religious or belief orientation (. . .). In this positive understanding, the principle of neutrality serves as an antidote to all sorts of biases, exclusions, negative stereotypes and discrimination. It provides an open and inclusive framework for the free and non-discriminatory unfolding of religious and belief diversity”¹⁶.

The accommodation of neutrality with an increasingly pluralistic social reality leads, in my opinion, to the opportunity to adopt a conception of neutrality, not as a denial or “invisibilization” of the religious presence in society, but as acceptance, normalization, and inclusion of existing diversity. It should also be borne in mind that neutrality understood as the exclusion of everything religious may not be neutral, as it is not an “aseptic” reflection of reality and, furthermore, in this option of not accommodating beliefs, “non-religious” citizens would be at an advantage¹⁷. The current situation calls, in my view, for the option of inclusive neutrality¹⁸. Furthermore, it should be noted that, as will be seen later, a religion

that is constrained or confined within a bubble is more likely to generate a lack of social cohesion, and in some cases even radicalization, than a “normalized” religious presence.

In any case, in our country, the competent body for ruling on the compatibility of religious education in public schools with the constitutional principle of secularism understood that: “The inclusion of religious education in the education system—on an optional basis—makes it possible for parents to exercise their right to have their children receive religious and moral education in accordance with their convictions (Art. 27.3 CE), as well as the effectiveness of the right of religious denominations to the public dissemination and expression of their religious beliefs, which is the core content of religious freedom in its collective dimension (Art. 16.1 CE)” (STC 38/2007 of 15 February)¹⁹.

3. Basis and Social Function of Religious Education in State Schools

Having pointed out the compatibility between religious education in state schools and the neutrality of the institution, I will now refer to the legal basis on which such education is founded and the social function it can perform in line with the recommendations of international organizations.

3.1. Legal Basis for Religious Education in Public Schools

As for the direct basis, mention should be made of the right of parents to have their children receive religious and moral education in accordance with their convictions²⁰. This right is enshrined in the main international texts. Thus, the United Nations International Covenant on Civil and Political Rights establishes that “the States Parties to the present Covenant undertake to have respect for the liberty of parents and, when applicable, legal guardians to ensure the religious and moral education of their children in conformity with their own convictions” (Art. 18.4). Similarly, within the Council of Europe, the European Convention on Human Rights states that “No person shall be denied the right to education. In the exercise of any functions which it assumes in relation to education and to teaching, the State shall respect the right of parents to ensure such education and teaching in conformity with their own religious and philosophical convictions. (Art. 2, Additional Protocol)”²¹.

The Spanish legal system expressly enshrines this right in the Constitution by stating that “the public authorities guarantee the right of parents to ensure that their children receive religious and moral instruction in accordance with their own convictions” (Article 27.3)²². For its part, the Organic Law on Religious Freedom stipulates that “1. Religious freedom. . . guaranteed by the Constitution includes the right of every person to: (c) Receive and teach religious education and information of all kind, either orally, in writing or by any other means, to choose for oneself and for the non-emancipated and disable children under one’s responsibility, in and out of the school, the religious and moral education according with one’s own religious beliefs. (. . .) 3. For the real and effective application of these rights, the public authorities shall adopt the necessary measures (. . .) to ease religious education in public educational institutions” (article 2).

It should be noted that the provision expressly states “in and out of the school”²³. Certainly, the absence of religious education in schools would not necessarily deny parents the aforementioned right, but it would make it difficult for them to exercise it. Furthermore, the inclusion of religious education in schools is linked to the intention of giving it an academic character.

Among the criteria that such teaching should meet in order to achieve academic standards, the authors refer to the following: (a) it should be of high quality and taught rigorously; (b) it should contribute to education in general; (c) it should include some form of interfaith learning that helps to foster tolerance and respect²⁴; (d) that satisfies children’s right to religious education; (e) and that is taught by professionally competent teachers²⁵.

Some have pointed out that parents' right to choose religious education for their children in accordance with their beliefs would be safeguarded by the existence of private or state-subsidized schools with a specific ideology. However, by including it on a voluntary basis in state schools, all parents are guaranteed the exercise of this right, and not only those who can and want to send their children to a private school; that is, the aim is to make state schools open to all.

The rationale behind the existence of religious education in state schools is the need for this option to be voluntary, as it obviously cannot be compulsory under any circumstances²⁶.

3.2. Social Function of Religious Education

Alongside the main legal basis of guaranteeing the exercise of parents' right to religious education for their children on an equal footing, religious education in state schools also fulfills other social functions that contribute to social cohesion and coexistence. In this paper, two aspects will be highlighted: firstly, that religion is a phenomenon of undoubted social significance in history and in the present day; hence the need to understand it in order to comprehend other aspects of culture such as art, literature, etc.; that is, it would be a question of combating what has come to be known as "religious illiteracy". Secondly, religious education in schools is an instrument of integration and social inclusion for religious minorities in our country and a tool for preventing radicalization. I will now briefly discuss these two aspects. Some authors have also included among these functions the need to satisfy the search for meaning in life, which has become more pressing after the collapse of the great secular ideologies²⁷.

(a) Promoting religious knowledge and culture.

The document "Toledo Guiding Principles on the Teaching of Religion in Public Schools", prepared by OSCE-ODIHR, addresses this issue. Although it refers to non-denominational religious education, it is worth noting that among its conclusions it states that knowledge about religions and beliefs "can make us more aware of the importance of respecting the right of all people to freedom of religion or belief, promoting democratic citizenship, fostering understanding of diversity within society and, at the same time, increasing social cohesion". It adds that knowledge of religion "has valuable potential to reduce conflicts that arise from a lack of understanding of the beliefs of others and to promote respect for their rights" and "is an essential component of quality education. It is a prerequisite for understanding much of history, literature and art, and can be useful for broadening cultural horizons and gaining a deeper insight into the complexity of the past and present"²⁸.

In the same vein, among the reasons for promoting the study of religion in schools, Ferrari points to the need to combat religious ignorance, which hinders understanding and leads to a lack of knowledge about a central dimension of personal and collective life²⁹.

(b) The teaching of religion as a tool for the social inclusion of people belonging to religious minorities.

In recent decades, Western societies have seen a proliferation of conflicts, unrest, tensions and an increase in populism and hate speech of various kinds, leading us to question the effectiveness of public policies on social inclusion, specifically the inclusion of new ethnic-religious minorities, which are increasingly present in countries within our cultural sphere³⁰.

In my view, part of the problem stems from the fact that people belonging to these communities, mainly—though not exclusively—Islam, are still perceived in their own countries as "foreigners"³¹. However, many of its members, even those from migrant backgrounds, are now second-, third-, or subsequent-generation European citizens, some

with no ties abroad. It is this duality of incompatible identities—civic and religious—that ultimately leads to detachment, isolation, frustration or, especially among young people, what could lead to radicalization.

Given this observation, greater attention must be paid to the specific religious situation of persons belonging to these minorities and to their normalization within the social landscape. One such measure could be to improve understanding of the religious phenomenon and the importance of respect for beliefs as an important part of a person's identity; that is, greater knowledge of religion³². Likewise, the inclusion of religion in public schools and the study of one's own beliefs in connection with civic values can undoubtedly act as an antidote to dualistic discourses that present religion as something antagonistic to civic values³³. In this regard, teaching religion, and specifically the religion of people belonging to minorities, is an excellent tool for cohesion and prevention of radicalization, and an optimal instrument for inclusion³⁴.

For example, if Islam is taught in schools using authorized textbooks and programs that are compatible with constitutional values³⁵, teachers with the required qualifications and integrated into the school, etc., the children who receive this education will learn it as something in accordance with the legal system and society in which they live³⁶. Their understanding will be very different if they only hear about religion in a mosque- oratory, from a foreign imam who speaks another language and gives a speech that has no connection with the input the child receives outside that space, rather than through the internet or social media, where they can easily fall prey to radical groups³⁷. We therefore have an optimal tool for managing the inclusion of religious minorities, from which we could derive greater benefits for society if we were more aware of the importance of this issue³⁸. In the face of the misuse of religion, a deep, calm and truthful understanding of religion is more necessary than ever for peace and coexistence.

As I have already mentioned, the suitability of religious education as a tool for social cohesion has been highlighted by European and international organizations that urge the teaching of religions, with denominational and non-denominational education being complementary³⁹. Thus, for example, the Council of Europe maintains: "7. School... lays the foundations for tolerant behaviour, founded on respect for the dignity of each human being. By teaching children the history and philosophy of the main religions with restraint and objectivity and with respect for the values of the European Convention on Human Rights, it will effectively combat fanaticism. Understanding the history of political conflicts in the name of religion is essential. (. . .) 14. The Assembly also recommends that the Committee of Ministers encourage the governments of member states to ensure that religious studies are taught at the primary and secondary levels of state education"⁴⁰.

4. Issues Relating to Religious Education in Schools

Having referred to the legal basis and social function of religious education in schools, in this section I will address some of the questions raised by its provision. Firstly, I will discuss whether such education should be denominational or whether it should be a non-denominational subject covering the history and culture of religions. Secondly, I will try to answer some questions regarding the authority to hire and dismiss religious education teachers in state schools. Finally, I will briefly refer to the alternative subject to religion; that is, what do those who do not study religion study?

4.1. Denominational and/or Non-Denominational Religion

With regard to the teaching of religion in schools, it is necessary to determine whether we are referring to denominational teaching of religion and/or non-denominational teach-

ing, i.e., history or culture of religions⁴¹, present, above all, in the United Kingdom and Scandinavian countries, and taught, as it is non-denominational, on a compulsory basis⁴².

Behind the debate on denominational or non-denominational teaching of religion or religions, Ferrari has pointed out that there are two different conceptions of public school. For those who defend denominational teaching, school is, above all, an institution at the service of families and students, so if they request such teaching, public schools should be able to offer it. For those who defend non-denominational teaching, school is, above all, an institution at the service of society as a whole, so if social changes require knowledge of the different religions present in the country, the school must offer it. In reality, as the author himself points out, this is a false dilemma, since both types of education—religious and non-religious—are not incompatible and each fulfills a complementary function⁴³.

Focusing on non-denominational religious education in state schools, one objection that has been raised is whether it is possible to teach it neutrally. In this regard, if teachers are trained, it does not seem that the difficulties of teaching this subject in a neutral manner are very different from teaching other subjects such as philosophy, history, etc., in a neutral manner. Neutrality will be respected if the teacher explains religions (their history, traditions, etc.) but does not express an opinion on them.

Another aspect that has aroused suspicion in some sectors regarding non-denominational teaching of religions is the fear that this subject will end up replacing religious education. In this regard, it should be emphasized that, as I have pointed out, these are subjects with different rationales: non-denominational teaching of religions responds to the right to education that encompasses knowledge of a world of which religions are—and always have been—a part. Confessional teaching, however, although it also contributes to the above, is based more directly on giving effect to the right of parents to have their children educated according to their beliefs. In any case, it should be emphasized that confessional and non-confessional religious education are not mutually exclusive options, but complementary ones.

It is interesting to note that, in addition to introducing a specific subject on non-denominational teaching of religion or beliefs, there are other ways of achieving or reinforcing the same objective; for example, by introducing cross-curricular teaching on the subject, adding some content to history, philosophy, literature, etc. Another option is offering some specific extracurricular activities, perhaps on the occasion of major religious festivities.

A final point to note in relation to this issue is that, alongside the teaching of religions, the school curriculum should also include, in some way, the education of students in tolerance and respect for religious freedom, given the growing importance of this right in an increasingly pluralistic society. Furthermore, it should be borne in mind that the increasing secularization of our society may lead to a decline in sensitivity to the importance that beliefs have for a person with beliefs, and to the connection between these beliefs and personal dignity. This subject could also help to highlight the positive contribution of religion throughout history and in the present day: the role that religions have played and can play today. It could show, in the words of UNESCO, “the role of religion in consolidating in society moral values, tolerance, social optimism, the furtherance of intercultural dialogue and civil peace”⁴⁴. The news tends to highlight abuses committed in the name of religion, making it easy to have a negative view of this reality and forget that religions have played, and continue to play, an important social role in education, helping people in need, etc. This knowledge would reinforce an attitude of tolerance and respect towards people with different beliefs.

4.2. *The Hiring of Religion Teachers*⁴⁵

This has probably been one of the most contentious issues put before the courts in Spain. The current system establishes the need for a proposal from the religious authority—

a declaration of suitability⁴⁶—for the hiring of teachers by the competent public education administration under a labor regime with a permanent contract that is automatically renewed each year and under conditions comparable to those of other temporary teachers at the same educational level⁴⁷. As for the causes for termination of the contract, in addition to the general ones, it is worth mentioning the religious revocation of suitability⁴⁸.

The questions raised by the aforementioned system are mainly the following. First, it is questioned whether public procurement linked to a religious proposal is legitimate. Secondly, there has been debate as to whether religious suitability may require teachers to behave in a manner consistent with the tenets of the religion and morality they teach, or whether they should only be required to have the necessary knowledge of the subject and teaching methods. Finally, can religious suitability be challenged in court? And if so, on what aspects can the courts rule? I will address these questions below.

(a) With regard to the legitimacy of public procurement linked to a proposal made by a religious denomination, this is justified solely by the confessional nature of the subject matter to be taught. Thus, the Constitutional Court has affirmed that “the power granted to ecclesiastical authorities to determine who is qualified to teach their religious creed constitutes a guarantee of the freedom of churches to impart their doctrine without interference from public authorities (. . .). It would be inconceivable for public administrations to entrust the teaching of religion to persons who are not considered suitable by the religious authorities. It is only the churches, and not the State, that can determine the content of religious education to be taught and the requirements for persons qualified to teach it”⁴⁹.

(b) Regarding whether suitability may require teachers to behave in a manner consistent with the tenets of the religion and morality they teach, or only knowledge of the subject and teaching skills, the Constitutional Court has also ruled that “the Constitution allows for the consideration not only of the knowledge and teaching skills of religion teachers, but also of their own behavior, “to the extent that personal testimony constitutes a defining component of the religious community’s creed, to the point of determining aptitude for teaching, understood as a means of transmitting certain values”⁵⁰.

(c) Regarding the aspects on which the courts may rule when a teacher is dismissed due to the withdrawal of their suitability on religious grounds, in the opinion of the constitutional body, these are as follows: First, they must assess whether the withdrawal of suitability is based on religious or moral grounds, as these are the only grounds that justify the intervention of a religious authority in public hiring⁵¹. If so, the court will weigh up the rights that have been infringed, taking into account that the teacher’s rights are rights associated with the position he holds; that is, in the performance of a religious task. In this weighing up, obviously, the court cannot make an assessment of the beliefs⁵².

The manner in which this weighing of rights (those of the teacher dismissed for loss of suitability and those of the denomination and parents to have their children educated by whoever is denominationally suitable) is carried out is not uncontroversial. Recently, the courts have ruled in some cases that religious motivation in the decision to withdraw suitability on the grounds of personal conduct incompatible with the tenets of Catholic morality cannot, in itself, prevail over the fundamental rights of the worker⁵³. However, in other similar cases, the ruling has been to the contrary. Thus, in STC 128/2007, of June 4, the Constitutional Court considered that, once it had been proven that the non-renewal of suitability was based on religious and moral criteria defined by religious authorities, it was necessary to weigh up the conflicting rights, bearing in mind that “the limitations established cannot obstruct the fundamental right beyond what is reasonable” and, in that case, “they are not disproportionate or unconstitutionally prohibited, insofar as they are justified by respect for the lawful exercise of the Catholic Church’s fundamental right to religious freedom, in its collective dimension (Art. 16.1) in relation to the right of parents to

the religious education of their children (Art. 27.3)” (f.j. 11). The case would eventually reach the European Court of Human Rights, which understood that the restriction of the teacher’s rights pursued a legitimate aim: to protect rights such as the autonomy of the Catholic Church in choosing persons qualified to teach religious doctrine⁵⁴.

Underlying these conflicts is the dual and peculiar concurrence of powers between the contracting administration (given that these are teachers employed by public schools) and the religious denomination (given that the teacher is hired by the school to perform a “religious” task). Although other models of teacher employment might better protect the autonomy of religious denominations, Spanish lawmakers opted for employment contracts in order to better protect the economic and social rights of workers.

4.3. The Alternative to Religion: What Do Those Who Do Not Study Religion Study?

The final issue briefly considered in this paper is what alternatives are pursued by students who do not take the religion course. The answers to this question have changed in the various education laws in Spain, laws that, moreover, have been modified practically with each change of legislature⁵⁵. A summary of the subjects proposed in the various laws is provided in Table 5.

Table 5. Law and Alternative to Religion.

Year	Law	Alternative to Religion
1980	LOECE— <i>Ley Orgánica por la que se regula el Estatuto de Centros Escolares</i>	Study activities/free time
1985	LODE— <i>Ley Orgánica del Derecho a la Educación</i>	Not specified; depends on the center
1990	LOGSE— <i>Ley Orgánica General del Sistema Educativo</i>	Study activities (non-academic)
2002	LOCE— <i>Ley Orgánica de Calidad de la Educación (no aplicada)</i>	“Society, Culture, and Religion”
2006	LOE— <i>Ley Orgánica de Educación</i>	Educational Support/Citizenship Education (compulsory for all)
2013	LOMCE— <i>Ley Orgánica para la Mejora de la Calidad Educativa</i>	Social and Civic Values (Primary)/Ethical Values (Secondary)
2020	LOMLOE— <i>Ley Orgánica de Modificación de la LOE (“Ley Celaá”)</i>	Educational support (without academic content or grading).

Whatever the subject, it should be borne in mind that it is essential that the subject or activity offered as an alternative to religion be of educational interest to students and that the choice between religion and the alternative not be discriminatory toward any students⁵⁶.

5. Conclusions

Every society is the result, among other factors, of its history, and there is no doubt that in Spain, the tradition of Catholic confessionalism has had a significant influence. This is probably why there are voices in our country that identify the presence of religious education in schools with confessional motivations to indoctrinate students. Not enough consideration is given to the fact that, in the current context of a secular state, in a fairly secularized and increasingly pluralistic society, religious education in public schools plays a crucial role. Along with its essential foundation—the right of parents to choose religious and moral education for their children in accordance with their convictions—religious education currently fulfills an important function as a tool for strengthening social cohesion. However, the new social and legal context has required modifications to the system. Firstly, obviously, is the voluntary nature of its provision; alongside this, the incorporation of the teaching of

the different religious denominations present in the country; the development of curricula that include specific training in the subject in connection with current educational values, among other aspects, articulating it in such a way that it contributes to respect and engage in dialogue with other beliefs, hence the interest in supplementing denominational religious education with some form (specific or cross-cutting) of non-denominational teaching of the different religious traditions, in order to help counteract the lack of education of younger generations in this area and combat existing prejudices through knowledge. Awareness of the suitability of this tool for social peace and coexistence should serve to separate it from the ideological debate or discourse of the end of the last century; what in France has been called moving from a “secularism of incompetence (religion is none of our business) to a secularism of intelligence (it is our duty to understand it)”⁵⁷.

Funding: This research received no external funding.

Institutional Review Board Statement: Not applicable.

Informed Consent Statement: Not applicable.

Data Availability Statement: The original contributions presented in this study are included in the article. Further inquiries can be directed to the corresponding author.

Conflicts of Interest: The author declares no conflict of interest.

Notes

- ¹ For information on the current system of religious education in state schools in Spain, see: Valencia (2023, pp. 461–97).
- ² Cf. Agreement between the Spanish State and the Holy See on Education and Cultural Affairs, dated 3 January 1979, in: <https://www.boe.es/buscar/doc.php?id=BOE-A-1979-29491> (accessed on 6 October 2025).
- ³ Cf. Article 10 of: Law 24/1992, of 10 November, approving the Cooperation Agreement between the State and the Federation of Evangelical Religious Entities of Spain (<https://www.boe.es/buscar/doc.php?id=BOE-A-1992-24853>, accessed on 6 October 2025), Law 25/1992, of 10 November, approving the Cooperation Agreement between the State and the Federation of Jewish Communities of Spain (<https://www.boe.es/buscar/doc.php?id=BOE-A-1992-24854>, accessed on 6 October 2025), and Law 26/1992, of 10 November, approving the Cooperation Agreement between the State and the Islamic Commission of Spain (<https://www.boe.es/buscar/act.php?id=BOE-A-1992-24855>, accessed on 6 October 2025).
- ⁴ In Spain, alongside the general regime that applies to all religious denominations, those that are recognized by the State as having “notorious roots” in society because they meet the requirements set out in the regulations are granted certain benefits that others do not have (for example, the right to perform marriages with civil effect). Of the nine religious denominations that have been recognized as having deep roots, four of them—the Catholic Church, the Federation of Evangelical Entities of Spain, the Federation of Jewish Communities of Spain, and the Islamic Commission of Spain—also have a specific cooperation Agreement with the State. The possibility of teaching religion in public schools is currently reserved for religious denominations with an Agreement, although other denominations are demanding the same right.
- ⁵ “Educational plans (...) shall include the teaching of the Catholic Religion in all Educational Centers, in conditions equal to those of the basic subjects. Out of respect for freedom of conscience, this religious education shall not be obligatory for all students. However, the right to receive it is guaranteed” (Article II of the Agreement between the Spanish State and the Holy See on Education and Cultural Affairs, dated 3 January 1979).
- ⁶ Regarding the alternative, see Section 4.3 of the article.
- ⁷ Cf.: https://www.observatorioreligion.es/banco-de-datos/5_3_ensenanza_religiosa_evangelica.html (accessed on 6 October 2025).
- ⁸ Combalía (2020, pp. 169–86). On the difficulties involved in the specific implementation of Islamic religious education, see Mohamed Mohamed (2025, pp. 61–95). The author distinguishes between difficulties specific to Islamic communities (dual leadership of the Islamic Commission of Spain until 2015 and internal disagreements, parents’ lack of awareness of their rights, lack of candidates with the appropriate qualifications, etc.) and difficulties related to educational authorities and their unwillingness to implement the subject.
- ⁹ See the obstacles placed by some autonomous communities to such teaching in the Reports on the situation of religious freedom in Spain (in https://www.mpr.gob.es/mpr/subse/libertad-religiosa/Documents/InformeAnual/InformeAnual_2017.pdf, (accessed on 6 October 2025, p. 51). See also, among other rulings, the recognition of the right to such teaching in the ruling of the High Court of Justice of Andalusia, dated 16 December 2022; the rulings of the High Court of Justice of La Rioja, No. 290/2017 of 11 October and No. 322/2017 of 2 November; the ruling of the High Court of Justice of Murcia, 8 February 2022.

- 10 See, for example, the campaign “For a public and secular school: religion out of school” at <https://laicismo.org/campana-unitaria-2025-por-una-escuela-publica-y-laica-religion-fuera-de-la-escuela/> (accessed on 6 October 2025).
- 11 On the importance of comparative studies of religious education in schools, see Schweitzer (2016, pp. 15–38). A detailed description of the different models of religious education in Europe can be found at Ferrari (2014, pp. 25–44). For other European models of religious education in public schools, see: M.J. Roca, *El modelo alemán de enseñanza de la religión en la escuela pública*, en I. Cano (ed.), “La enseñanza de la religión en la escuela pública: actas del VI Simposio Internacional de Derecho Concordatario” (Roca 2013, pp. 139–63); E. Camassa, *El modelo italiano de enseñanza de la religión: evolución y cuestiones abiertas*, en I. Cano (ed.), “La enseñanza de la religión en la escuela pública: actas del VI Simposio Internacional de Derecho Concordatario” (Camassa 2013, pp. 121–38).
- 12 Cf. in: González-Varas (2018, p. 7).
- 13 Rothgangel et al. (2016, pp. 7–9). In this regard, the following can be mentioned, among others: the publication of the Council of Europe *Religious diversity and intercultural education: a reference book for schools* (2007); the Recommendation of the Ministers of Foreign Affairs of the Council of Europe at their 118th session on education and intercultural dialogue (2008); the *Toledo Guiding Principles on Teaching About Religions and Beliefs in Public Schools* (OSCE-ODIHR 2008), which affirms that such teaching contributes to a “culture of mutual understanding and respect” and encourages “respectful behavior and increased social cohesion,” and that all members of society benefit from knowledge about each other’s religions. Among the *United Nations General Assembly Resolutions on Dialogue among Religions and Cultures for Peace*, A/RES/78/129 of 18 December 2023, “recognizes the importance of dialogue among religions and cultures and its valuable contribution to the promotion of social cohesion and inclusion, peace, and development.” The UNESCO *Recommendation on Education for Peace, Human Rights, International Understanding, Cooperation, Fundamental Freedoms, Global Citizenship, and Sustainable Development* of 2023 states that “26. Member States should promote an education that, throughout all levels and strands, includes the study of different cultures and their reciprocal influence. Such study should encourage the understanding and valuing of diverse perspectives, ways of life, worldviews, religions, beliefs and philosophies of life, and has the potential to reduce conflicts that are based on a lack of understanding”.
- 14 In this regard, Roca has written, “Well, if public schools and their teachers have to be neutral, society does not have to be, and in fact, it is not. Every person has the right to ideological freedom and is under no obligation to be neutral. Parents, and students to the extent that they are mature minors, have their own cultural, ideological, and religious convictions, or lack thereof” (Roca 2008).
- 15 In relation to the above, on the difference between the concept of “secularism” and “secularity,” see Robert Jackson’s *Religious Education: An Interpretive Approach*, (Jackson 1997, p. 139).
- 16 Report of Mr. Bielefeldt (2014), Special Rapporteur on freedom of religion or belief, submitted to the United Nations General Assembly on 5 August 2014, A/69/261, No. 5, P. 17, in <https://www.refworld.org/cgi-bin/texis/vtx/rwmain/opendocpdf.pdf?reldoc=y&docid=54084c054> (accessed on 6 October 2025). The Advocate General of the CJEU, Medina, recently expressed a similar opinion in response to the preliminary ruling in case C-344/20. She states that a first approach to neutrality would be to “normalize such differences in the workplace by more strictly controlling prejudices. The starting point is that differences arising from religion and religious beliefs are best addressed by promoting tolerance and respect, which in turn leads to greater acceptance of diversity.” The second perspective would be to consider “that differences resulting from religion and religious beliefs can be better addressed in the workplace by promoting uniformity through a general prohibition by means of an internal rule.” (Conclusions of the Advocate General of the CJEU, Ms. Laila Medina, in Case C-344/20, LF v. SCRL, presented on 28 April 2022, No. 59, at: <https://curia.europa.eu/juris/document/document.jsf?text=&docid=258501&pageIndex=0&doclang=es&mode=lst&dir=&occ=first&part=1&cid=951018> (accessed on 6 October 2025).
- 17 In this regard, and in defense of this inclusive concept of neutrality, Martínez-Torrón has written, “I see no reason to demand, in a country that enjoys religious peace, that no religious symbols be visible in school classrooms or on the clothing of students or teachers, rather than allowing students to see in their own school a reflection of the plurality that exists in society. Giving free rein to spontaneous expressions of religious pluralism seems much more consistent with a truly neutral attitude on the part of the State, and probably also more enriching for students, than imposing the fictitious absence of religion.” (J. Martínez-Torrón 2014, pp. 136–37).
- 18 Cf. in: Z. Combalía (2024).
- 19 Similarly, the European Court of Human Rights considers that the provision of religious education in public schools is respectful of fundamental rights, provided that the possibility of exemption is guaranteed. Cf. ECHR, *Valsamis v. Greece and Efstratiou v. Greece*, 18 December 1996, and ECHR, *Grzelak v. Poland*, 22 November 2010.
- 20 On the basis of religious education in schools, see M. E. Olmos, *El derecho de los padres a decidir la formación religiosa y moral de sus hijos*, en I. Cano (ed.), “La enseñanza de la religión en la escuela pública: actas del VI Simposio Internacional de Derecho Concordatario” (Olmos 2013, pp. 19–42). A. González-Varas, *La enseñanza de la religión en las escuelas públicas españolas y su relación con el contexto europeo*, en “Scripta Fulgentina”, Año XXIX – Nº 57–58, (González-Varas 2019, pp. 34–38). Ver también: L. Ruano,

El derecho de los padres a elegir la educación moral y religiosa conforme a sus convicciones en la jurisprudencia del TEDH, “Derecho y Religión”, (Ruano Espina 2014, pp. 59–84).

- 21 It should be borne in mind, as González-Varas points out, that religious education is different from and complementary to catechesis, as they have different aims: religious education imparts knowledge about religion, but does not seek to convince students; catechesis, on the other hand, does seek to promote personal adherence and encourage a life consistent with belief. See: González-Varas (2018, pp. 51–53).
- 22 For information on parliamentary discussions and positions regarding the approval of Article 27.3 of the Constitution, see: Vázquez García-Peñuela (2005, p. 146).
- 23 Interestingly, it was the Communist parliamentary group that managed to include in the text the clarification that this right to choose the religious education of one’s choice should be understood as applying “both inside and outside the school environment” (Mantecón Sancho 2002, p. 246).
- 24 In this regard, it is interesting to note that religious education curricula in Spain, despite being confessional, all include several explicit references to interreligious dialogue and tolerance. Thus, (1) with regard to Catholic religious education, the curriculum includes the following among the basic knowledge: “C. Living in a plural and diverse world to build a common home. (...)—Appreciation of intercultural and interreligious dialogue for peaceful and democratic coexistence”. Specific competency 5.2 refers to “Respecting different churches and religious traditions, knowing and valuing the beliefs, rites, symbols, and principles of each of them, having elements of personal judgment that favor interreligious dialogue” (Resolution of 21 June 2022, of the Secretary of State for Education, BOE of 24 June). (2) In relation to evangelical religious education, “D. Interreligious coexistence,” as well as “F. The importance of religious freedom and signs of religious intolerance” (Resolution of 3 April 2024, of the Secretary of State for Education, BOE of 5 April). (3) Similarly, Islamic religious education refers to “1. developing skills that enable respect for the religious and cultural diversity of the country; understanding the values and attitudes of Muslims as an example of rapprochement between different cultures, religions, and social groups; analyzing concepts such as “plurality,” “coexistence,” “peace,” “tolerance,” etc., as well as those related to non-discrimination against people on the basis of place of birth, beliefs, race, sex, religion, opinion, or any other personal or social difference. . .” 2. To put the expression of their religious messages at the service of good, interreligious dialogue, and pluralistic coexistence.” (Resolution of 16 September 2022, of the Secretary of State for Education, BOE of 22 September).
- 25 Cf. in: Schweitzer (2016, p. 24).
- 26 Among European countries, there are some where religious education is compulsory, with the right to exemption or to choose another subject, and others where religious education is optional or freely chosen. See González-Varas (2018, pp. 84–98).
- 27 Thus, Ferrari, among the reasons for strengthening the study of religion in public schools, mentions “the need to satisfy the demand for meaning, which became more acute after the collapse of the great secular ideologies” (Ferrari 2014, p. 26).
- 28 Cf. conclusions 1, 2 y 3 (p. 15) of the document in: <https://www.osce.org/files/f/documents/b/3/29155.pdf> (accessed on 6 October 2025). Referring to France, where there is no religious education in schools, the following has been written: “Since the mid-1980s, there has been genuine concern, particularly in the press, among various actors in the education system, especially teachers, about the lack of religious culture among students, which prevents them from addressing certain literary, historical, philosophical or artistic topics because they lack the necessary cultural references. This religious ignorance, which appears to be profound, affects the younger generations, regardless of their level of education or stage of secondary or even university education (future teachers), and the religion they profess, as it is observed in non-believers as well as in believers, ignorance also confirmed by religious authorities” (Estivalézes 2003, p. 62).
- 29 Ferrari (2014, p. 26). Ferrari mentions four reasons why it is desirable to strengthen the presence of religion in schools. In addition to the one already mentioned, the author refers to the need to understand the new religious plurality; the need to satisfy the demand for meaning, especially after the fall of the great secular ideologies; and the need to educate in tolerance and respect.
- 30 The European Union has highlighted the lack of policies specifically aimed at combating discrimination based on membership of a group on grounds of religion, as opposed to discrimination on other grounds, which is more widely protected: Cf. at European Union Agency for Fundamental Rights and Council of Europe, Handbook on European anti-discrimination law, Luxembourg: Publications Office of the European Union, 2019, pp. 37 and 544, at: https://www.echr.coe.int/Documents/Handbook_non_discri_law_SPA.pdf (accessed on 6 October 2025). To mitigate these differences, initiatives such as the Proposal for a Council Directive implementing the principle of equal treatment between persons irrespective of religion or belief, disability, age, or sexual orientation were launched in Brussels, 2.7.2008, COM (2008) 426 final, 2008/0140 (CNS), en: <https://eur-lex.europa.eu/legal-content/ES/TXT/PDF/?uri=CELEX:52008PC0426> (accessed on 6 October 2025).
- 31 Thus, a report by the European Monitoring Center on Racism and Xenophobia (EUMC) points out that “According to respondents, even in cases where Muslims are nationals of a Member State, they may feel excluded. They feel that they are perceived as ‘foreigners’ who pose a threat to society and are treated with suspicion. This feeling seems to be stronger among young Europeans born Muslim than among their parents. While the second and third generations are in many ways more integrated than the first, at the same time their expectations are higher and, therefore, exclusion is felt more acutely” (*Musulmanes en la Unión Europea*:

discriminación e islamofobia. Percepciones sobre discriminación e islamofobia. Voces de miembros de las comunidades musulmanas en la Unión Europea, Documentos de Casa Árabe n° 1/2007, at: https://www.ikuspegi.eus/documentos/documentos_externos/eumcinformes1.pdf, accessed on 6 October 2025).

Ferrari emphasizes this importance in the following terms: “the need to understand and manage the new religious plurality, which requires knowledge of different religions, for example, Islam” (Ferrari 2014, p. 26).

On this issue, see González-Varas (2023, pp. 90–94).

On the teaching of religion, specifically Islam, as a tool for inclusion and the prevention of radicalization, see Vega Gutiérrez (2023).

For information on the development of curricula, teacher training, teaching materials, etc., for Islamic religious education, see Mohamed Mohamed (2025, pp. 97–134).

See, for example, the contents and competencies of Islamic religious education in the Resolution of 16 September 2022, of the Secretary of State for Education, publishing the curricula for Islamic religious education (BOE No. 228, of 22 September 2022). By way of illustration, I reproduce the first specific competency for primary education: “1. To know and be aware of the religious and socio-cultural diversity of the environment and of Spain with openness and tolerance, based on the identification of one’s own beliefs and those of others, reflecting on the importance that the Envoys and completed by the Prophet gave to good customs (...) integrating them into one’s own identity as attitudes committed to good, to the rules of coexistence and respect for cultures and beliefs. It is important that this competence emphasises attitudes related to positive coexistence, interculturality, respect for different prophets and recognition among different peoples, all of which are necessary for the development of the identity of believers at this age”.

On this issue see Z. Combalía (2024). On the teaching of Islam and the integrative value of religious education, see: González-Varas (2022, pp. 47–57); Roca (2003, pp. 309–24); Roca (2021); Rossell (2004, pp. 111–36).

Another tool that, in the opinion of minorities, would be very useful for promoting sensitivity to religious pluralism would be the inclusion of education on religious culture and knowledge in school curricula. On this issue, see the guidelines provided by OSCE-ODIHR in the Toledo Guiding Principles on Teaching about Religions and Beliefs in Public Schools, 2008, at <https://www.osce.org/files/f/documents/b/3/29155.pdf> (accessed on 6 October 2025).

In this regard, Ferrari also points out how it is necessary to educate citizens in the spirit of mutual tolerance and respect for “others” with their values and beliefs, which requires knowledge of one’s own identity and also that of others (Ferrari 2014, p. 26). Council of Europe (2005). On the crucial role of this teaching in preventing intolerance and discrimination based on religion or belief, see, with particular reference to the International Consultative Conference on School Education in Relation to Freedom of Religion and Belief, Tolerance and Non-Discrimination, held in Madrid in November 2001: Rossell (2002, pp. 225–40).

Regarding this type of teaching, see González-Varas (2018, pp. 41–49).

In Spain, the LOMLOE (Organic Law 3/2020, of 29 December, amending Organic Law 2/2006, of 3 May, on Education) has introduced a Section 3 to the 2nd Additional Provision, which establishes that “3. Within the framework of the regulation of primary and compulsory secondary education, non-denominational teaching of religious culture may be established.” However, to date, there is no record of this subject, which the law establishes as a possibility, having been established in any Autonomous Community.

Cf. in: Ferrari (2014, p. 33).

Cf.: UNESCO, *The contribution of religion to the establishment of a culture of peace and the promotion of interreligious dialogue*, in “Records of the General Conference, session 29, Paris 1997”, n° 48.

On this issue, see Combalía (2013).

Regarding the canonical nature of this suitability in the case of Catholic religion teachers, some describe it as a “missio canonica,” while others consider it to be closer to the concept of a mandate. The classification is not a trivial matter but has significant canonical consequences, since it determines the degree of legal dependence between the teacher and the bishop. For further discussion of this issue, see Combalía (2013, pp. 118–26).

In addition to religious suitability, religion teachers must have the same qualifications as those required of teachers of other subjects at the corresponding educational level (primary, secondary, or high school).

On this issue see Rodríguez Moya, Almudena, *El estatuto jurídico del profesor de religión. Un estudio multinivel*, Dykinson, Madrid, (Rodríguez Moya 2023, pp. 63–73).

Constitutional Court Ruling 38/2007, of 15 February (Official State Gazette No. 63, of 14 March 2007), legal basis n° 9.

Constitutional Court Ruling 38/2007, of 15 February (Official State Gazette No. 63, of 14 March 2007), legal basis n° 5.

Thus, for example, the ruling of the High Court of Justice of Castile and León (Labor Chamber) of 23 October 2019 states, “In the present case, based on the proven facts (...), it appears that the reason (for the withdrawal of the canonical mission) is ‘pedagogical’. (...) It is said with regard to the specific case of the plaintiff that she had been warned since 2011 to comply with the pedagogical aptitude requirements, demanding that she comply with a schedule, submit the subject syllabus, submit a report on each course, develop the curriculum proposed by the Spanish Episcopal Conference, carry out pedagogical and practical updating, and prepare files. It seems that we are dealing more with a disciplinary issue for failing to meet academic

rather than religious requirements, in which case the Administration should have considered the abuse of power in withdrawing the canonical mission on grounds unrelated to the fundamental right of religious freedom before proceeding to terminate the employment relationship. (...) Secondly, it is appropriate for the court to review whether or not the withdrawal of the canonical mission meets strict religious criteria. And in this case, as the appellant claims, the terms used by the Bishopric are generic, without specifying what behavior led to the withdrawal of the canonical mission, and as we said earlier, it suggests that these are issues related to the educational sphere rather than the religious sphere, which necessarily leads us to consider that the plaintiff has been the subject of unfair dismissal. . .”.

- 52 Thus, it has been argued that “the control of the cause for termination which, under Article 7.b) of Royal Decree 696/2007, may be exercised by the education authorities over the decision of the Bishopric is exhausted (...) , in verifying whether it comes from the authorized person or body of the corresponding religious denomination and in ruling out that such a decision is motivated by reasons other than those that can legitimately give rise to it, which are of a religious nature, always within certain limits. It is not within the competence of the employing Administration to assess or qualify the correctness, from the point of view of the corresponding religion, of the decision of the corresponding religious denomination that withdraws suitability, nor to make an assessment of the employee’s conduct from a religious point of view” (Judgment of the High Court of Justice of Castile and León (Social Chamber) of 23 October 2019).
- 53 This has been the case, for example, in two cases that coincided in that both involved religion teachers whose suitability was not renewed by the Bishopric because they were in a marital relationship contrary to Church doctrine. See Supreme Court Ruling 799/2021 (Social Chamber) of 20 July 2021, based on Constitutional Court Ruling 140/2014 of 11 September, which had resolved a similar case. In my view, it was not sufficiently appreciated that this was a case of a conflict between fundamental rights, as it involved, alongside the rights of the teachers, the rights of parents and the Church to religious freedom. Perhaps it was also not properly considered that, when they freely entered into the employment contract, both parties were aware of the peculiar nature of their task and the commitment it entailed to be consistent with the doctrine they were going to teach. See a critique of these rulings at: [Combalía \(2013, pp. 94, 161\)](#); [López-Sidro \(2021\)](#).
- 54 Cf. Judgment of the European Court of Human Rights, 15 May 2012, *Fernández Martínez v. Spain*. Regarding this judgment, see [J. Martínez-Torrón \(2017, pp. 374–90\)](#).
- 55 An analysis of the evolution of the model in the various laws passed up to 2005 can be found at [Vázquez García-Peñuela \(2005, p. 155\)](#).
- 56 In this regard, the Supreme Court rulings of 9 June 1994, 30 June 1994, 3 February 1994, and 17 March 1994, annulled a series of articles of Royal Decrees 1006/91, 1007/91, and 1700/91, which referred to alternative activities to religion, among other reasons, because it established that these activities would consist of age-appropriate study, guided by the teacher, related to the minimum teaching requirements for each school year, which placed those studying religion who did not receive this academic support at a disadvantage.
- 57 Régis Debray, *L’enseignement du fait religieux dans l’École laïque*, Paris, Odile Jacob, ([Debray 2002, p. 43](#)).

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