

Atheist Ireland

Submission to Department of Education on Inclusiveness in Primary Schools



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“This state is a Republic, proudly proclaimed outside the GPO nearly 97 years ago. In a Republic, different faiths and moral points of view should be both heard and respected. But no faith, however dominant, should be allowed to prevail above the wishes of minorities, particularly when it is intended to enshrine those beliefs into law. That is not the shape or essence of a true Republic.”

-- Ruairi Quinn TD, Dail Eireann, 27 June 2013 ⁱ

1. Introduction

1.1 Atheist Ireland is an Irish advocacy group. We promote atheism and reason over superstition and supernaturalism, and we promote an ethical, secular society where the State does not support or finance or give special treatment to any religion. You can read details of our policies on our website at <http://atheist.ie>.

1.2 Since being formed in late 2008, we have campaigned against the Irish blasphemy law, campaigned for a secular Irish Constitution and a secular Irish education system, lobbied political parties and candidates on secular policies. We have made Submissions to the United Nations, the Council of Europe and the OSCE, and raised in particular the discrimination suffered by teachers, secular parents and their children in the Irish Education system.

1.3 In order for schools to be inclusive they must be prepared to respect and protect the human rights of ALL parents and their children. As it stands now denominational schools cannot be called inclusive as they do not respect the human rights of ALL parents and children.

1.4 This Submission will show how the State has failed to respect and protect the human rights of secular parents and their children in denominational schools. It will also show how Catholic Church teaching on education is incompatible with human rights law.

2. Respecting Secularism as a Philosophical Conviction

2.1 The Irish State views the rights of secular parents as a negative right, e.g. opting out of religious instruction classes in the education system. However, under international human rights law while it is a negative right it also includes a positive obligation on behalf of the State to ‘respect’ the philosophical convictions of secular parents and their children.

2.2 The right to ‘respect’ is an absolute right not to be balanced against the rights of others nor one that can be gradually achieved.

2.3 It is this failure to recognise secularism as a philosophical conviction with both negative and positive obligations that has resulted in the government mistakenly believing that denominational schools are inclusive and compatible with human rights law.

2.4 The European Convention obliges the state to respect the religious and philosophical convictions of ALL parents in the Irish Education system and that includes secular parents and their children. The State cannot absolve itself from that responsibility by delegating its responsibility to patron bodies.

2.5 The European Court has stated that:-

“Secondly, in the United Kingdom, independent schools co-exist with a system of public education. The fundamental right of everyone to education is a right guaranteed equally to pupils in State and independent schools, no distinction being made between the two (see, *mutatis mutandis*, the above-mentioned *Kjeldsen, Busk Madsen and Pedersen* judgment, Series A no. 23, p. 24, para. 50).

Thirdly, the Court agrees with the applicant that the State cannot absolve itself from responsibility by delegating its obligations to private bodies or individuals (see, *mutatis mutandis*, the *Van der Musselle v. Belgium* judgment of 23 November 1983, Series A no. 70, pp. 14-15, paras. 28-30).”ⁱⁱ

2.6 The European Court has linked Article II of Protocol 1 (the right to education) of the European Convention with the right to freedom of Conscience, the right to freedom of expression and the right to private and family life.

“The two sentences of Article 2 of Protocol No. 1 must be interpreted not only in the light of each other but also, in particular, of Articles 8, 9 and 10 of the Convention (see *Kjeldsen, Busk Madsen and Pedersen*, cited above, p. 26, § 52).”ⁱⁱⁱ

2.7 Secularism is recognised as a philosophical conviction under Article II of Protocol 1 (the right to education) of the European Convention.

The European Court of Human Rights recognises that the:-

“supporters of secularism are able to lay claim to views attaining the “level of cogency, seriousness, cohesion and importance” required for them to be considered “convictions” within the meaning of Articles 9 of the Convention and 2 of Protocol No. 1 (see *Campbell and Cosans v. the United Kingdom*, 25 February 1982, § 36, Series A no. 48). More precisely, their views must be regarded as “philosophical convictions”, within the meaning of the second sentence of Article 2 of Protocol No. 1, given that they are worthy of “respect ‘in a democratic society’”, are not incompatible with human dignity and do not conflict with the fundamental right of the child to education.”^{iv}

2.8 The word respect in relation to the rights of parents under Article II of Protocol 1 (the right to education) denotes not only a negative undertaking not to interfere with the right but also incorporates a positive obligation on the State to vindicate that right. The right to respect under Article II of Protocol 1 of the European Convention is an absolute right, not to be balanced against the rights of others or one that can be gradually achieved.

2.9 Article 2 of Protocol No. 1 of the European Convention does not permit a distinction to be drawn between religious instruction and other subjects. The State is obliged to respect parents’ convictions, be they religious or philosophical, throughout the education system. That obligation not only applies to the content of education and the manner of its provision but also to the performance of all the “functions” assumed by the State.

2.10 As it stands now, denominational schools do not respect the philosophical convictions of secular parents and their children because that conviction is incompatible with their educational philosophy. In balancing the rights of minorities they do not recognise the positive obligation to respect. They also fail to recognise that the right to respect is an absolute right and not one that can be balanced against their ethos/characteristic spirit.

2.11 The European Court has stated that:-

“The verb “respect” means more than “acknowledge” or “take into account”. In addition to a primarily negative undertaking, it implies some positive obligation on the part of the State. The term “conviction”, taken on its own, is not synonymous with the words “opinions” and “ideas”. It denotes views that attain a certain level of cogency, seriousness, cohesion and importance (see *Valsamis*, cited above, pp. 2323-24, §§ 25 and 27, and *Campbell and Cosans*, cited above, pp. 16-17, §§ 36-37).”

2.11 In *Cambell & Cosans v the UK* the European court stated that:-

“Whilst the adoption of the policy referred to clearly foreshadows a move in the direction of the position taken by the applicants, it does not amount to ‘respect’ for their convictions. As is confirmed by the fact that, in the course of the drafting of Article II of Protocol 1, the words ‘have regard to’ were replaced by the word ‘respect’ (see documents CDH (67) 2, p. 163) the later word means more than ‘acknowledge’ or ‘taken into account’; in addition to a primarily negative undertaking, it implies some positive obligation on the part of the State (see *mutatis mutandis*, the *Marckx* judgement of 13 June 1979, series A no 31, p. 15, par. 31). This being so, the duty to respect parental convictions in this sphere cannot be overridden by the alleged necessity of striking a balance between the conflicting views involved, or is that Government’s policy to move gradually towards the abolition of corporal punishment in itself sufficient to comply with this duty.”^v

2.12 In 2008 the UN Human Rights Committee stated that:-

“22. The Committee notes with concern that the vast majority of Ireland’s primary schools are privately run denominational schools that have adopted a religious integrated curriculum thus depriving many parents and children who so wish to have access to secular primary education. (arts. 2, 18, 24, 26).

The State party should increase its efforts to ensure that non-denominational primary education is widely available in all regions of the State party, in view of the increasingly diverse and multi-ethnic composition of the population of the State party.”

Article 2 is the right to be free from discrimination.

Article 18 is the right to freedom of conscience.

Article 24 is the rights of the child.

Article 26 is the right to equality before the law.

2.13 The State recognises that denominational schools must respect minorities but also obliges Boards of Management “to be accountable to the patron for so upholding, the characteristic spirit of the school.” There is nothing in the Education Act 1998 that defines ‘respect’ and nothing that acknowledges that this is an absolute right for ALL parents and their children and not to be balanced against the rights of others.

2.14 Section 15 2 (e) of the Education Act reads:-

“have regard to the principles and requirements of a democratic society and have respect and promote respect for the diversity of values, beliefs, traditions, languages and way of life in society.”

It is difficult to understand how the state can respect the human rights of secular parents and their children with the desire of a religious school to educate in a religious ethos, and especially to teach a religious integrated curriculum.

2.15 Under the Education Act 1998, schools are not obliged to write down their Characteristic Spirit (ethos). Parents cannot ensure that the teaching of their children is in conformity with their convictions as they simply do not know what they are being taught throughout the State curriculum. Schools are not obliged to deliver the curriculum in an objective, critical and pluralistic manner.

2.16 The Catholic Bishops Conference in their policy document, Catholic Primary Schools; A Policy for Provision into the Future state that:-^{vi}

“4.3The Catholic school welcomes diversity and strives for inclusivity. It is open to people of other denominations and other faiths, welcomes them into its community and respects their beliefs:

The religious freedom and the personal conscience of individual students and their families must be respected, and this freedom is explicitly recognised by the Church. On the other hand, a Catholic school cannot relinquish its own freedom to proclaim the Gospel and to offer a formation based on the values to be found in a Christian education; this is its right and duty. (RDECS, 6)”

“It is sometimes the case that people choose the Catholic school simply because it is the only school available, and not because they wish their children to have a Catholic education. This can cause difficulties for parents who do not share the ethos of a Catholic school. It can also put an unfair financial and administrative burden on the parish.

We feel that in such circumstances the Church should not be left with the task of providing for the educational needs of the whole community. As the Catholic Church accepts that there should be choice and diversity within a national education system, it believes that parents who desire schools under different patronage should, where possible, be facilitated in accessing them.”

2.17 The Irish Catholic Bishops have said that it would be irrational to expect Catholic patrons to provide secular education.

“A non-denominational, wholly secular school would give expression to its own ethos but it would exclude, on clearly articulated philosophical grounds, all religious symbols, rituals and formation. The Catholic Schools Partnership acknowledges the right of patrons and parents to establish such secular schools. It is notable that no patron is providing

such an education in Ireland today. To expect Catholic patrons to provide such education is obviously irrational. The absence of truly secular schools is a contributing factor to the confusing terminology used in Irish educational discourse. As a result the term ‘multidenominational’ is used in numerous, often contradictory, senses.”^{vii}

2.18 In a Circular Letter issued in 2008 the Holy See stated that:-

“6. Catholic schools are characterised by the institutional link they keep with the Church hierarchy, which guarantees that the instruction and education be grounded in the principles of the Catholic faith and imparted by teachers of right doctrine and probity of life (cf. c. 803 CIC; cc. 632 e 639 CCEO).”

“17. Religious education in schools fits into the evangelising mission of the Church.”

2.19 It is difficult to understand how Church and State can claim that denominational schools are inclusive when they fail to have respect and promote respect for the philosophical convictions of secular parents and their children. The State is ‘providing for’ the education of minorities in denominational schools and as such is responsible for the protection of their human rights.

2.20 The Catholic Bishops Conference clearly does not understand that they have a positive obligation to respect the philosophical convictions of secular parents. Then again the Catholic Bishops and the Holy See have not ratified the European Convention or the UN Covenant on Civil & Political Rights, but the Irish State has. Providing for the education of minorities in denominational schools while absolving itself of the responsibility to protect their human rights cannot be described as protecting pluralism in a democratic state.

2.21 Under human rights law evangelising or pre-evangelising minorities does not constitute respect for their convictions and it certainly cannot be described as inclusive. How can a school call itself inclusive when at the same time it is evangelising/pre-evangelising minorities into a religious way of life. How are parents to ensure that the teaching of their children is in conformity with their convictions if schools are not even obliged to inform parents what their children are being taught through the religious integrated curriculum?

2.22 The Irish State has handed control over the human rights of minorities to, in the main, the agents of a foreign state. The Education Act 1998 has failed to protect the human rights of minorities in the education system as religious bodies are excessively involved in decisions that affect the human rights of secular parents and their children. That cannot be described as pluralism or an inclusive education system when the interpretation of respect and inclusion are based on the teachings of, in the main, one religious body that also defines itself as a state.

2.23 That state, the Holy See has rejected the Toledo Guiding Principles. The Toledo Guiding Principles are based on human rights and in particular the right to freedom of conscience. Ireland is a member of the OSCE and has not rejected the Toledo Guiding Principles. Out of the 56 States in the OSCE the Holy See is the only one that has rejected the Toledo Guiding Principles.

2.24 The reason they gave is as follows:-

“Furthermore, the Holy See has noted the upcoming presentation of the Toledo Guiding Principles on Teaching about Religions and Beliefs in Public Schools and is surprised. While recognizing that they were prepared by the Panel of Experts on Freedom of Religion, it is difficult to understand why participating States, especially the Holy See that speaks openly on matters of religion, were not consulted. The Document contains a reductive view of religion and a conception of the secular nature of States and their neutrality that obfuscates the positive role of religion, its specific nature and contribution to society. In doing so, the document contradicts what has always marked the OSCE’s understanding of religion.”^{viii}

2.25 The European Court has stated that –

“Furthermore, while it is important to ensure that representatives of religious communities are allowed to give input and advice, this should not be taken to the extreme of giving them too much decision-making power at the cost of abdicating state responsibility. The European Court of Human Rights has made it clear that excessive involvement of religious authorities from one community in decisions that affect the rights of those belonging to another community may itself amount to a violation of the right to freedom of religion or belief.”^{ix}

2.26 It is clear that Catholic education and human rights law are incompatible, and handing control over the human rights of minorities to private bodies and a foreign state has undermined human rights and pluralism.

2.27 The European Court has stated that:-

“31. As enshrined in Article 9, freedom of thought, conscience and religion is one of the foundations of a “democratic society” within the meaning of the Convention. It is, in its religious dimension, one of the most vital elements that go to make up the identity of believers and their conception of life, but it is also a precious asset for atheists, agnostics, sceptics and the unconcerned. The pluralism indissociable from a democratic society, which has been dearly won over the centuries, depends on it.”^x

3. Rule 68 - Religious Integrated Curriculum

3.1 The Irish Catholic Bishops told the Forum on Patronage and Pluralism that the integrated curriculum must give expression to the characteristic spirit of the school, and that an approach that suggested all religions are the same would undermine the characteristic spirit of the school.

“The integrated curriculum and the Religious Education programme must give expression to the characteristic spirit of the school. How, for instance, could Social, Personal and Health Education be conceived of independently of the Religious Education programme? While students can opt out of particular subjects in accordance with the law, they cannot opt out of the culture and characteristic spirit of the school whether it is non-denominational, multi-denominational or denominational...

It is not altogether clear what is intended by the recommendations on religious symbols, celebrations and prayer. If it is intended that all schools should heighten their sensitivity to the presence of children of all faiths and none then this is welcome. However, if a more syncretistic approach is being proposed which suggests that all religions are the same or that a school should not give expression to its identity and should reduce it to the lowest common denominator, then this would clearly undermine the characteristic spirit of the school.”^{xi}

3.2 In order to ensure that there is inclusion in ‘stand alone’ schools the human rights of all parents should be guaranteed and protected without discrimination. Parents cannot opt out their child from religion that is integrated into the curriculum and consequently cannot ensure that the teaching of their children is in conformity with their convictions. At present schools are not legally obliged to inform parents where exactly they are integrating religion into the various subjects.

3.3 It is impossible to opt out of a religious integrated curriculum, as religion is integrated into the curriculum and the curriculum is not delivered in an objective, critical and pluralistic manner.

3.4 Rule 68 of the Rules for National schools regarding the religious integrated curriculum is simply a reflection of Catholic church teaching. In a Circular letter in 2008 to all Bishops' Conferences the Holy See deemed it necessary to recall some principles that are rooted in Church teaching:-

“12. The marginalization of religious education in schools is equivalent to assuming – at least in practice – an ideological position that can lead pupils into error or do them a disservice. Moreover, if religious education is limited to a presentation of the different religions, in a comparative and “neutral” way, it creates confusion or generates religious relativism or indifferentism.”

13. Based on what has been said, it is clear that teaching the Catholic religion has its own specific nature vis-à-vis other school subjects.”^{xii}

3.5 A religious integrated curriculum can include grace before meals, class prayers, religious views on abortion and homosexuality, religious assemblies, religious ceremonies, prayers over the intercom, religious symbols on school uniforms and teaching as a truth the existence of a god etc etc. How can parents identify the areas throughout the curriculum and daily life of the school and then opt their child out of these areas? It simply cannot be done.

3.6 To ensure that the human rights of ALL parents are respected the Irish Human Rights Commission has recommended that, Section 15 of the Education Act be amended to provide for modifications to the integrated curriculum to ensure that the rights of minority faith or non faith children are also recognised therein.

3.7 The Irish Human Rights Commission, in their Report, Religion & Education: A Human Rights Perspective, May 2011, raised this issue and Recommended that:-

“Section 15 of the Education Act should be amended to provide for modifications to the integrated curriculum to ensure that the rights of minority faith or non faith children are also recognised therein. In this regard, the State must take sufficient care that information and knowledge included in the curriculum is conveyed in an objective, critical and pluralistic manner with the aim of enabling pupils to develop a critical mind with regard to religion in a calm atmosphere which is free of any misplaced proselytism.”

3.8 The Recommendation from the Forum on Patronage and Pluralism is that Rule 68 of the Rule for National Schools be removed immediately and that provision is made for denominational religious education/faith formation to be taught as a discrete subject.

3.9 If schools are to be inclusive of all children the above recommendation of the Irish Human Rights Commission must be implemented in full as otherwise the State is failing in its positive obligation to take sufficient care that the curriculum is conveyed in an objective critical and pluralistic manner. That is the limit that must not be exceeded. The right to respect for the convictions of all parents is an absolute right and not to be balanced against the rights of others or one that can be gradually achieved.

4. Other Specific Recommendations

4.1 Remove Section 7 – 3 (c) of the Equal Status Act

4.1.1 The starting point for inclusion is that all children are equal and have access without discrimination. No school can call itself inclusive if at the starting point it discriminates on religious grounds. That is not inclusion, diversity or a welcome.

4.1.2 Religious discrimination in access to schools breaches the human rights of parents and children. All children should have access to their local schools without discrimination on any ground. The state is failing in their positive obligation to respect the philosophical convictions of parents if they ‘provide for’ their education in schools that discriminate on religious grounds in access to education.

4.1.3 In their Submission to the Department of Education on school enrolments the Irish Human Rights Commission states: “The IHRC recommends that pending further diversity in school provision the Government amend section 7 of the Equal Status Acts 2000-2008.”

4.2 Opting out of Religious instruction/formation classes.

4.2.1 The burden placed on parents by the failure to legally oblige schools to supervise children or to provide an alternative subject has rendered the right to opt out inoperable in practice. Parents are deterred from even exercising the right to opt out because of the burden involved.

4.2.2 Students should be able to opt into an alternative course in ethics in accordance with the Toledo Guiding Principles to accord equal respect for all children so that they do not feel ostracised. It should be a meaningful alternative and parents should be given a choice when enrolling in the school.

4.2.3 Enrolment forms should require parents to either tick the ethics class or the Religious Instruction class, with full explanation of what each entails. There should be an OPT IN in the case of both classes.

4.3 Education about Religions, Beliefs and Ethics (ERB)

4.3.1 One of the Recommendations in the Report from the Forum on Patronage and Pluralism is to introduce a subject under the curriculum called Education about Religions, Beliefs and Ethics (ERB). The Recommendation reads as follows:-

“The Advisory Group is of the view that all children have the right to receive education in ERB and Ethics and the State has the responsibility to ensure that this is provided. The Advisory Group requests that the NCCA, with assistance from the partners and mindful of existing programmes, should develop curriculum and

teacher guidelines for ERB and Ethics, in line with the Toledo Principles, the RedCo, and the Cambridge Primary Review.”

“The Advisory Group has a particular concern for those children who do not participate in religious programmes in denominational schools. They may go through their primary schooling without any ERB and ethical education. For these children, the proposed programmes in ERB and Ethics are of central importance.”

4.3.2 The Advisory Group state that they are of the view that ALL children have a right to receive education in ERB and Ethics. At present there is no access to education in ERB and Ethics at either primary or second level for the children of secular parents. At second level the state religious education course is combined with the Guidelines for the Faith Formation and development of Catholic students and presented to secular parents as suitable for their children, in many cases it has been made compulsory.

4.3.3 This is what happens if the decisions that affect the human rights of minorities are left in the hands of Patron Bodies who have a religious ethos. If the new ERB Course is to include ALL children then it must be delivered in an objective, critical and pluralistic manner and not combined with Guidelines from a specific religious body/foreign state.

4.3.4 The Catholic Church are quite clear about not teaching about religions and ethics in a objective, critical and pluralistic manner. In a Circular Letter to all Bishops' Conferences they stated that:-

“12. The marginalization of religious education in schools is equivalent to assuming – at least in practice – an ideological position that can lead pupils into error or do them a disservice. Moreover, if religious education is limited to a presentation of the different religions, in a comparative and “neutral” way, it creates confusion or generates religious relativism or indifferentism.”

4.3.5 Combining any new course on ERB with Catholic religious instruction/education will leave secular parents with no option but to opt out their children again. The state will have failed in its positive obligation to respect the convictions of secular parents and their children. It is a breach of human rights to leave decisions that will impact on the human rights of minorities, in the hands of a private institution that rejects those principles. Any new course must be in accordance with the Toledo Guiding Principles.

4.4 The Right to respect for Private and Family life

4.4.1 The right to respect for Private and Family life is a human right. Parents should not be obliged to divulge private information to schools regarding their religious or non-religious convictions.

4.4.2 There should be no need for the school authorities to require parents to give over this information if there is equality of access and if parents are given a choice in enrolment forms of whether to enrol children into faith formation or ethics classes. Schools should be made aware that parents have a right to private and family life and schools should not require parents to divulge their convictions or question them regarding what they believe or do not believe.

4.4.3 The local priest should not have access to the class and the school should not divulge any private information regarding parents contact details or religious or non-religious affiliations to clergy even if they are the patron of the school.

4.5 Sacramental preparation

4.5.1 There should be no sacramental preparation during schools hours as this alienates and stigmatises non-majority children. Sacramental preparation should take place in parishes. Time spend on sacramental preparation during school hours also means that minorities lose out on precious school time.

4.6 Opting out of Communal prayers, reflections hymns and school assemblies

4.6.1 Schools should recognise that prayers and hymns are the practice of religion and therefore cannot be inclusive of the non-religious. These type of events should be inclusive of the whole school community which includes the children of secular parents. They can be presented as a time for reflection.

4.6.2 Graduation ceremonies should not be religious but should include all the school community. Parents should not be put in the position that they have to opt their child out of the Graduation ceremony because it is an organised religious ceremony.

4.6.3 There should be no prayers before lessons or grace before meals. In order to include all children, schools should have periods of reflection that are inclusive of all.

4.7 Religious Symbols

4.7.1 There should be no religious symbols in schools. Schools should not oblige children to wear a religious symbol on their school uniform.

4.8 The right to an effective remedy

4.8.1 One of the Recommendations from the Forum on Patronage and Pluralism is that the Minister for Education should make schools aware of the human rights requirement of national and international law. Parents and their children should have access to an effective remedy to vindicate their human rights. If the state is to implement this Recommendation then it must protect the human rights of ALL parents as inclusion cannot be achieved if children leave their human rights at the school gate.

5. Conclusion

5.1 In their list of Issues under the International Covenant on Civil & Political Rights, the UN Human Rights Committee have asked the state to:-

“26. Please provide information on steps being taken to ensure that the right of children of minority religions or non-faith are also recognized in the Education Act 1998, and the number of non-denominational primary schools that have been established during the reporting period.

Please also clarify whether there is an accessible and independent complaint handling mechanism to resolve disputes between parents and schools.”^{xiii}

5.2 Article 44.2.4 of the Irish Constitution was meant to protect the conscientious objections of minorities in the education system. In 1995 the Constitutional Review Group Report stated the following in regard to Article 44.2.4 and Article 42.3.1 of the Constitution:-

“if Article 44.2.4 did not provide these safeguards, the State might well be in breach of its international obligations, inasmuch as it might mean that a significant number of children of minority religions (or those with no religion) might be coerced by force of circumstances to attend a school which did not cater for their particular religious views or their conscientious objections. If this were to occur, it would also mean that the State would be in breach of its obligations under Article 42.3.1.”^{xiv}

5.3 Catholic Church teaching on education is incompatible with human rights law, and the Irish State has failed to respect and protect the human rights of secular parents and their children in denominational schools.

5.4 The state must recognise that inclusion in stand-alone schools means that secular parents and their children enjoy their human rights. It also means that decisions that affect our human rights are not left in the hands of patron bodies and a foreign state who have clearly disregarded those rights.

- i <http://www.labour.ie/press/2013/06/27/legislation-on-xcase-is-a-welcome-step-forward-for/>
- ii Para 27. <http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-57804>
- iii <http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-81356>
- iv <http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-104040>
- v Para 37 <http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-57455>
- vi http://www.catholicbishops.ie/wp-content/uploads/images/docs/cath_ps_policy_for_future.pdf
- vii <http://www.catholicbishops.ie/2011/04/13/catholic-schools-partnership-position-paper-2011/>
- viii <http://www.osce.org/pc/28557>
- ix Manoussakis v Greece (ECHR, 18748/91 1996) para 49-38 Toledo Guiding Principles p68
- x <http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-57827> para 31
- xi Council for Education of the Irish Episcopal Conference, 1st December 2011
- xii http://www.vatican.va/roman_curia/congregations/ccatheduc/documents/rc_con_ccatheduc_doc_20090505_circ-insegn-relig_en.html
- xiii http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2fIIRL%2fQ%2f4&Lang=en
- xiv <http://archive.constitution.ie/constitutional-reviews/crg.asp>