

Intolerance and Discrimination Against Christians in Europe Report 2025





The **Observatory on Intolerance and Discrimination against Christians in Europe** (OIDAC Europe) is a research-based non-governmental organisation based in Vienna, Austria. It focuses on systematically monitoring and analysing restrictions on freedom of religion, discrimination based on religious affiliation or conviction as well as violent incidents, including hate crimes and vandalism targeting Christian individuals and sites.

OIDAC Europe aims to provide objective, reliable and comparable data in order to help politicians, institutions and Christian churches to take effective measures to ensure the safety of places of worship and religious freedom in Europe.



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INTRODUCTION

The human right to **freedom of thought, conscience, and religion**, as enshrined in international and European human rights law, protects the very core of human personal freedom. As this right points to the conscience of the human person, which is foundational to human dignity, it can be seen as a philosophical foundation of human rights. Freedom of thought, conscience and religion, together with freedom of expression, has therefore been described as the "nucleus of the Bill of Rights" of the United Nations (UN).

In Europe, religious freedom is protected under the Council of Europe's **European Convention on Human Rights (ECHR)**, which is the most effective regional human rights body as it allows for individual complaints before the European Court of Human Rights (ECtHR). Nevertheless, violence and discrimination against Christians and other believers has increased in recent decades.

Against this backdrop, the **Observatory on Intolerance and Discrimination against Christians in Europe (OIDAC Europe)** was founded in 2010 with the aim of classifying and providing **objective**, **reliable and comparable data** on the phenomena of intolerance and discrimination against Christians at the European level, in order to help politicians, institutions and Christian churches to take effective measures to safeguard religious freedom in Europe.

OIDAC Europe's 2025 Annual Report presents data on (I) anti-Christian hate crimes and social hostility in 2024, and (II) legal restrictions impacting the religious freedom rights of Christians in Europe between 2024 and 2025.



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METHODOLOGY AND TERMINOLOGY

This report presents exploratory research of the phenomena of intolerance and discrimination against Christians in Europe. "Intolerance and Discrimination against Christians" is the term we use to describe the denial of equal rights and the social marginalisation of Christians.

The term 'intolerance' refers to the social dimension, i.e. social hostility and anti-Christian hate crimes, including threats or physical violence against Christians and vandalism of Christian places of worship. Data on these incidents are collected using a variety of methods and sources to ensure comprehensiveness and accuracy. The chapter on anti-Christian hate crimes thus provides an overview of data from official government statistics, international organisations, local civil society organisations and our own research.

'Discrimination', on the other hand, refers to the legal dimension and describes the denial of equal rights in the workplace or through discriminatory laws. While there are no comprehensive statistics or research on anti-Christian discrimination in Europe, the exemplary cases in this report have been chosen to illustrate the variety of incidents of anti-Christian discrimination, revealing its diverse aspects and far-reaching scope.

Due to the significant number of cases of intolerance, discrimination and legal developments affecting the religious freedom of Christians, this report discusses only a selection of incidents that took place in 2023-24. This report therefore does not provide an exhaustive overview of all recorded instances. To see all of our (over 6,000) documented cases, we encourage the reader to visit the archive on our website www.intoleranceagainstchristians.eu.

INTERNATIONAL HUMAN RIGHTS PROVISIONS AND THEIR IMPLICATIONS



FREEDOM OF CONSCIENCE AND RELIGION

Art 9 FCHR

1. Everyone has the right to freedom of thought, conscience, and religion; this right includes freedom to change his religion or belief and freedom, either alone or in community with others and in public or private, to manifest his religion or belief, in worship, teaching, practice, and observance.

The right to religious freedom as enshrined in human rights law extends to both a private dimension, including to live and act in accordance with one's conscience, which enjoys absolute protection from external coercion or state interference,³ and a public dimension, guaranteeing communal worship and manifestations, which may be subject only to a narrow set of limitations.⁴ Due to this broad scope, religious freedom rights intersect with a number of related human rights.



FREEDOM OF EXPRESSION

Art 10 FCHR

1. Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers.

According to international human rights law, freedom of religion and expression are closely interrelated, as the manifestation of one's religion has a strong communicative aspect.⁵ Both rights guarantee open communication, "thus contributing to (...) a culture of free public discourse."⁶ In this context, the European Court of Human Rights (ECtHR) holds that freedom of expression includes the right to disturb or shock.⁷ The introduction of overly broad 'hate speech' legislation, which criminalises speech that is deemed by others to be 'alarming' or 'distressing', may therefore violate the right to freedom of expression.



PARENTAL RIGHTS AND EDUCATION

Art 2 ECHR Protocol

The State shall respect the right of parents to ensure such education and teaching in conformity with their own religious and philosophical convictions.

Parental rights are violated when Christian parents are denied the freedom to educate their children according to their moral and religious beliefs. Infringements also occur when parents are refused the possibility of withdrawing their children from classes that are in violation of their conscience and religious or moral beliefs.



PROHIBITION OF DISCRIMINATION ON RELIGIOUS GROUNDS AND CONSCIENCE CLAUSES

Art 14 FCHR

The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion...

In order to ensure the non-discrimination of Christians in the workplace, states should accommodate objections to certain tasks if the individual's conscience forbids this action. In this context, the abolition of conscience clauses in employment is particularly problematic as it may result in the exclusion of Christians with conscientious objections to certain practices from entire professions. Similarly, an overly strict separation between work and personal faith may prevent Christians from disclosing their faith at work.

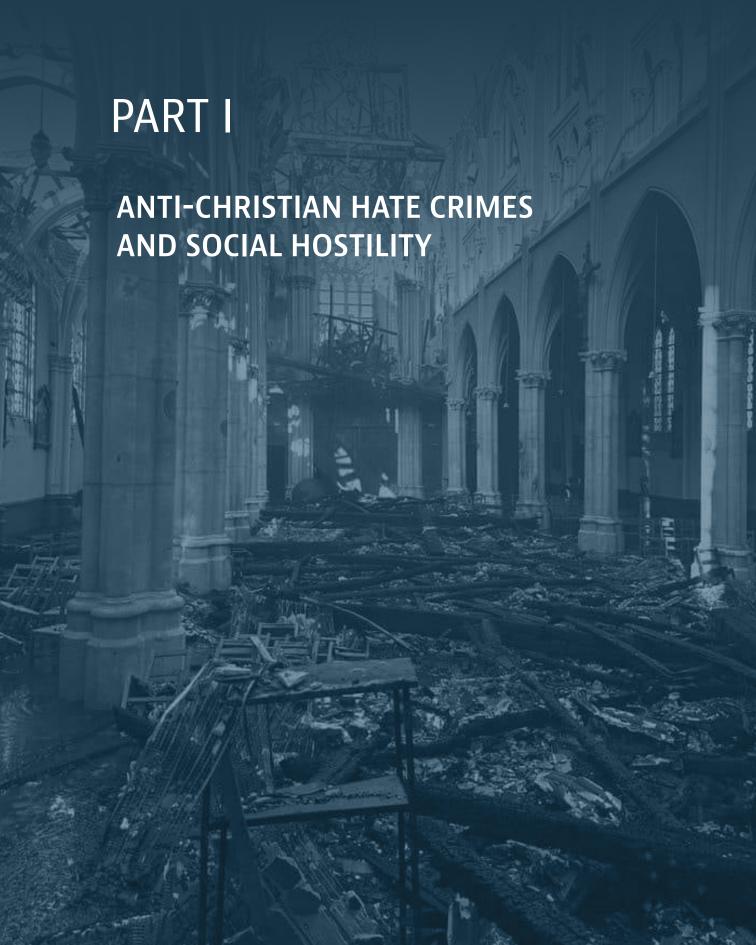
SUMMARY OF FINDINGS

ANTI-CHRISTIAN HATE CRIMES AND SOCIAL HOSTILITY

- → In 2024, a total of **2,211 anti-Christian hate crimes** were recorded by governments and civil society organisations across Europe, including **274** personal attacks.
- → The most affected countries in 2024 were France, the United Kingdom, Germany, and Spain. In November, a 76-year-old monk was killed and several others injured during an attack on a Spanish monastery. In January, one man was shot dead in an ISIS-related attack during Sunday mass at a Catholic church in Istanbul. In September, a historic church in Saint-Omer, France, was almost completely destroyed in an arson attack.
- → Recent surveys from Poland and Spain indicate significant underreporting of aggression against clergy. In Poland **nearly half** of surveyed priests reported **experiencing aggression** in the past year—yet **over 80% did not report** the incidents to the police.

LEGAL RESTRICTIONS

- → Between 2024 and 2025 OIDAC Europe identified multiple **restrictions on religious freedom** affecting Christians across Europe. These included bans on public prayer and religious manifestation, prosecutions for expressing religious beliefs, infringements on religious autonomy and parental rights, and limitations on conscientious objection.
- → As in previous years, several Christians were criminally charged for displaying Bible verses, offering voluntary conversations, or even silently praying in so-called "buffer zones" around abortion facilities. Others faced prosecution for peacefully expressing their religious beliefs or historic Christian teachings on issues related to sexual ethics.



HATE CRIMES AND SOCIAL HOSTILITY

In the absence of comprehensive Europe-wide statistics on anti-Christian hate crime, this chapter draws on a broad range of sources to present the most complete picture possible. It compares and compiles data from official **government reports, OSCE/ODIHR** hate crime statistics, local **civil society** organisations, and OIDAC Europe's own research.

OIDAC Europe adheres to the OSCE definition of hate crime as "criminal acts motivated by bias or prejudice against certain groups of people," which includes acts such as vandalism of places of worship. The OSCE's Christian-related data covers incidents targeting all self-identified Christian groups.

Anti-Christian Incidents in 2024

In 2024, a total of **2,211 anti-Christian hate crimes** were reported across Europe. While most attacks targeted places of worship, **274 personal attacks**, including incidents of physical violence and threats, were also documented.

This figure results from triangulating official police statistics, OSCE/ODIHR hate crime data, and records collected by OIDAC Europe. Police data was available from Austria, Belgium, Bosnia and Herzegovina, Denmark, Finland, France, Germany, Iceland, Poland, Romania, Serbia, and the United Kingdom.

OIDAC Europe independently recorded **516 anti-Christian hate crimes** in 2024. When including theft and break-ins at religious sites, this figure rises to **1,503 incidents**.

The slight decrease of the total number of 2,444 in 2023 to 2,211 in 2024 appears to be largely linked to **lower figures reported by UK police**, which noted a change in methodology in its official report. A modest decline in recorded incidents in **France** also contributed to the overall drop. However, figures from the first half of 2025 showed a renewed increase in incidents in France.

Despite the general decrease, **personal attacks rose** from 232 in 2023 to 274 in 2024—even though no official data on personal attacks was available from France and the UK for 2024.

In June 2024, during a Seventh-Day Adventist service in Dijon, France, an unidentified assailant entered the church and sprayed tear gas at the congregation. The attack caused panic and distress, injuring nine participants.8



Significant Underreporting

Anonymous surveys conducted in 2025 indicate a substantial underreporting of anti-Christian hate crimes. In Poland, for example, **nearly 50%** of Catholic priests surveyed reported **experiencing aggression** in the past year—yet **over 80% did not report** the incidents to the police (see page 15).

If extrapolated nationwide, this would suggest that as many as **14,000 priests** may have experienced aggression in Poland alone within the last 12 months, underscoring the scale of the issue and the limitations of relying solely on police-reported data.

Most Affected Countries 2024

Country	Police Data	Civil Society Data
France	770 ⁹	139 ¹⁰
United Kingdom*	502 ¹¹	47 ¹²
Germany	337 ¹³	134 ¹⁴
Austria	116 ¹⁵	26 ¹⁶
Spain	-	91 ¹⁷
Italy	-	86 ¹⁸
Poland	1 ¹⁹	78 ²⁰
Bosnia and Herzegovina	21 ²¹	23 ²²

^{*}Statistics for England and Wales, reporting period from April 2023 to March 2024.

Most Affected Countries

FRANCE: HIGHEST NUMBER OF HATE CRIMES

While France's territorial intelligence service reported a modest decrease in anti-Christian hate crimes from 2023 to 2024, the country continues to record the **highest number** of such incidents in Europe. In the first half of 2025, the trend reversed, with reported cases rising by 13% compared to the previous year.

One particularly serious case involved the complete destruction of a church in **Saint-Omer** following an arson attack. France also recorded a disproportionately high number of incidents with an **Islamist background**, including the arrest of a suspect linked to a planned ISIS-inspired terrorist attack on **Notre-Dame de Paris** and the desecration of a cemetery in southern France, where over **50 graves** and the church were defaced with slogans such as "Submit to Islam."

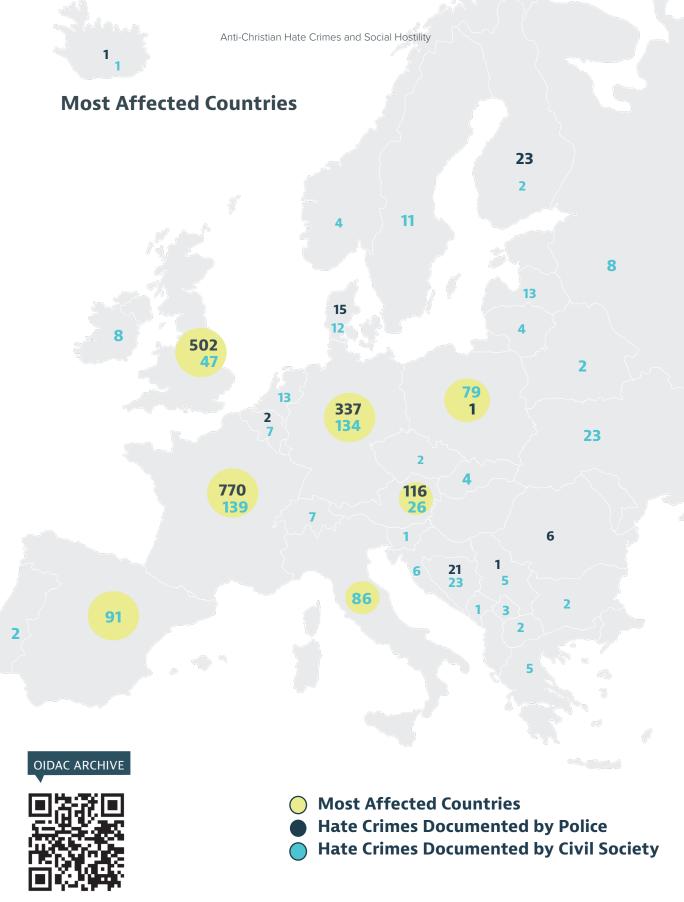
GERMANY: UNPRECEDENTED LEVEL OF VANDALISM

Anti-Christian hate crimes recorded by police have gone **up by 22%** from 277 in 2023 to 337 in 2024, **following a 105% increase** in the previous year. Those numbers, however, only include hate crimes with a political motive, thereby overlooking many anti-Christian attacks with other motives.²³ Based on OIDAC Europe's data, Germany had the **highest number of arson-related attacks** in 2024, with 33 documented cases.

In 2025, the **German Bishops' Conference** issued a statement warning that acts of **vandalism** in Catholic churches have become increasingly severe. Faced with a series of arson attacks in sanctuaries, excrement in confessionals, and beheaded statues of Christ, church leadership warned of an *"escalation"* in recent years, during which *"all taboos have been broken."*²⁴

SPAIN: PHYSICAL ATTACKS AND VANDALISM ON THE RISE

While the Spanish government does not record anti-Christian hate crimes, the 2024 Spanish Observatory for Religious Freedom Report found a sharp rise in anti-Christian hate crimes, with violent attacks against Christians doubling, including the murder of a Catholic monk. Vandalism of churches and symbols increased by 12% compared to the previous year. Overall, Christians were the main victims, suffering 168 of the 243 documented incidents, including religious freedom restrictions.²⁵

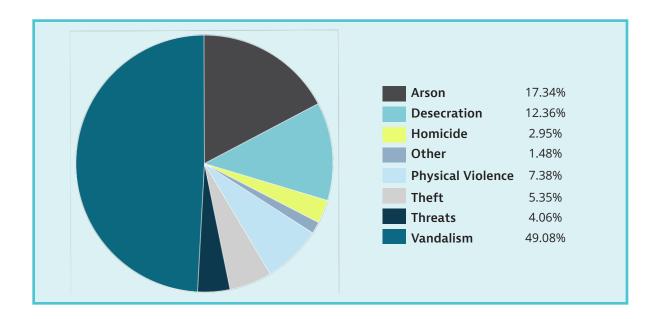


Kinds of Incidents

Anti-Christian incidents in 2024 ranged from vandalism and desecration of churches and religious symbols to threats, physical violence, and, in some cases, murder. While the majority of the 2,211 hate crimes recorded in 2024 targeted places of worship, **274 personal attacks**—including assault, harassment, and threats—were also reported.

Of the 516 anti-Christian hate crimes documented by OIDAC Europe in 2024, the most frequent form of violence was **vandalism** (50%), followed by **arson attacks** (15%), acts of **desecration** (13%), **physical assaults** (7.5%), **theft of religious objects** (5.5%), and **threats** (4%). OIDAC Europe also recorded 12 terrorism-related **incidents**—including cases in Russia and Turkey—most of which were fortunately prevented by national security services.

These figures do not include monetary theft and break-ins at religious sites, which amounted to nearly 900 additional recorded cases.



In September 2024, a man set fire to the sacristy of the Church of the Immaculate Conception in Saint-Omer, France. The blaze quickly spread to the naves and engulfed the entire structure, destroying the bell tower and roof.²⁶



Motives and Perpetrator Groups

Identifying the motives and perpetrators behind anti-Christian hate crimes remains challenging, as offenders are often not apprehended. As a result, only **limited information** is available regarding the motives behind most incidents.

Nevertheless, experts and affected communities frequently cite anti-clericalism, religious intolerance,²⁷ religious extremism,²⁸ negative media portrayals, and broader political or social tensions²⁹ as key drivers. Among the 93 cases documented by OIDAC Europe in which the perpetrators' motives or affiliations could be established, the most common were linked to **radical Islamist ideology (35)**, **radical left-wing ideology (19)**, **radical right-wing ideology (7)**, and other **political motives (11)**. Additionally, 15 incidents featured satanic symbols or references.

In January 2024, two masked gunmen entered Santa Maria Catholic Church in Istanbul's Sariyer district during Sunday mass and opened fire, killing one worshipper and injuring several others. The Islamic State later claimed responsibility for the attack.³⁰





In November 2024, a 76-year-old friar in Gilet, Spain, died of head injuries and six others were wounded when a 46-year-old man scaled the fence of a Catholic monastery and assaulted them with sticks and bottles, shouting anti-Christian threats and insults.³¹

OSCE PUBLISHES GUIDELINES ON COMBATTING ANTI-CHRISTIAN HATE CRIMES

In July 2025 the OSCE/ODIHR published the practical guide *Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities*. This document addresses participating states, civil society and religious leaders and can be rightly called a milestone, as it is the first time that an international organisation is treating the issue of anti-Christian hate crimes in Europe in such detail.

OIDAC contributed significantly to the guide by providing the context and examples for anti-Christian hate crimes in Europe. According to the OSCE Guide, anti-Christian hate incidents—ranging "from graffiti and vandalism to harassment, threats, physical assaults and murder" are "common methods used by perpetrators to harass or intimidate Christians"³² and constitute a security concern in the region.

However, "given the under-reporting by victims and under-recording" it is not possible to present a complete picture. "What makes this issue particularly urgent is how often religion-based hate crimes are **downplayed**, **under-reported or politically overlooked**,"³³ the Guide notes, emphasising that "anti-Christian hate crimes **do not take place in a vacuum.**"

The Guide further underlines that "political discourse and narratives have helped to perpetuate anti-Christian bias and stereotypes"³⁴ and calls actors to take responsibility in ensuring that their "language and actions do not perpetuate or reinforce anti-Christian bias."³⁵

It highlights that many Christian communities had to introduce additional **security measures**, in response to recent attacks on Christian places of worship and events and underscores the heightened vulnerability of certain groups, including converts from Muslim backgrounds who are especially at risk:

"Converts to Christianity from outside the OSCE region have reported threats and physical assaults, sometimes perpetrated by other migrants of different religious or belief backgrounds. These incidents often occur in migrant or refugee accommodation centres. (..) Given many of those affected are refugees fleeing persecution in their country of origin, the impact of such hate crimes can intensify the trauma they have already endured, increasing their need for support services."

- Understanding anti-Christian Hate Crimes, p. 29

The Guide furthermore highlights that crimes "motivated by intolerance against Christians profoundly impact not just the victims of specific attacks, but also the daily lives of Christian people and communities."³⁶ It also warns that such acts of hostility, "if left unaddressed" could "threaten the fabric of social cohesion, erode the foundations of peaceful coexistence"³⁷.

In its recommendations the Guide calls upon OSCE Participating States to:

- → Promptly and unequivocally condemn any anti-Christian hate crimes and publicly express solidarity with the affected Christian communities.
- → Strengthen the understanding of anti-Christian hate crimes across government.
- → Commission studies, disseminating civil society reports and setting up a cross-governmental working group.
 - Ensure that accurate and reliable data on anti-Christian hate crimes is collected.
 - Conduct victimization surveys to complement official data.
- → Include Christian communities and institutions on lists of potential soft targets of crimes by violent 'extremists' or terrorists.
- → Promote education, awareness-raising and interfaith and interreligious dialogue.
- → Develop and implement training and capacity-building programmes for law enforcement officials on the recording of anti-Christian hate crimes.
- → Work with Christian communities to effectively address hate crime-related security threats and needs.
- → Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias.



POLAND: HALF OF SURVEYED PRIEST FACED AGGRESSION IN PAST YEAR

In April 2024, the Polish ISKK released a report titled *Dangerous Mission? Aggression towards Clergy Members*, *Places*, *and Objects of Worship in Poland*.³⁸ Based on interviews with 996 Catholic priests, the findings reveal a troubling level of hostility.

Key findings:

49.7% experienced aggression* in the past 12 months

33.6% experienced hostility in online spaces

19.3%

reported encountering an attack on a church

10.8%

reported damage to parish property. Some also noted the disruption of religious services and the desecration of graves





The data also show a marked sense of vulnerability among clergy in public spaces:

42,8%

reported feeling unsafe when wearing clerical clothing in public.

Despite the prevalence of such incidents, most priests did not report them—suggesting a high dark figure of anti-Christian hate crimes in Poland:

80.8% of priests did not report the incidents to authorities

When asked about the underlying trends and causes of hostility:

85.9%

said aggression towards clergy has increased over the past decade 96.4%

cited negative media portrayals

91.1%

pointed to increasing political and societal tensions

^{*}verbal abuse, online harassment, physical or property-related attacks

Spain: Survey on Discrimination and Aggression Towards Priests

In February 2025, the *Observatory for Religious Freedom and Conscience in Spain* surveyed 117 Catholic priests nationwide.³⁹

Key findings:

67%

experienced insults, mockery, or offensive remarks

48%

reported vandalism of church property

20%

had personal property damaged (e.g., cross-shaped scratches on cars)

More serious incidents were also reported:

On questions of discrimination:

Perception of the wider context:

received threats or experienced

coercion

5%

were physically assaulted 12%

were denied services or faced direct discrimination 15% were excluded from meetings or events due to their clerical

status

90%

said they perceive a consistent media bias against Catholic priests and bishops

GERMANY: HALF OF YOUTH SEE HOSTILITY TOWARDS CHRISTIANS

In April 2025, a representative survey⁴⁰ in Germany asked about societal hostility towards Christians. When asked, "In your opinion, how widespread are hostile attitudes towards Christians in Germany?",

36.5%

of the general population

48.6%

of respondents under 29 years 65.8%

of Evangelical Christians 53.3%

of Muslim respondents

said hostile attitudes towards Christians in Germany are widespread.

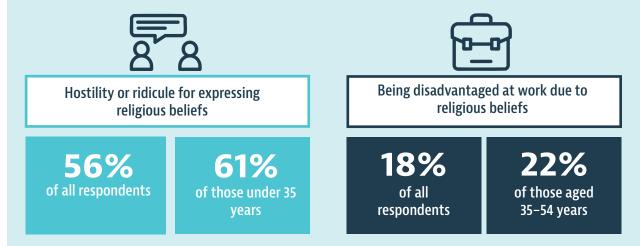
Additionally, 75.5%

of all respondents said people in Germany often refrain from expressing political opinions out of fear of negative consequences. This suggests a **rising atmosphere of self-censorship**, which may disproportionately affect Christians.⁴¹

United Kingdom: Hearings and Survey Point to Growing Discrimination

In June 2024, the report *The Cost of Keeping the Faith*⁴² was released, based on interviews with 1,562 Christians of different denominations and age groups in the UK.

Among the most common experiences were:



The UK Commission of Inquiry into Discrimination Against Christians (CIDAC) confirmed in its report that "Christians self-reportedly feel marginalised in what they regard as an increasingly hostile and discriminatory environment."43

In 2025, the Commission continued holding hearings, but also found that many Christian victims of discrimination chose not to participate—even anonymously—due to **fear of stigmatisation or personal consequences.**

Both the CIDAC report and the survey found that discrimination most often occurs in the workplace and relates to expressing religious views on social or moral issues.⁴⁴ In some cases, such discrimination extended even to private conversations⁴⁵ or personal social media posts—as exemplified by the case of Mrs. Higgs (see Part II).

ANTI-CHRISTIAN BIAS IN THE MEDIA

Concerns over biased media portrayals of Christians have increased in recent years. While press freedom is essential to democratic societies, repeated negative framing of Christian beliefs, individuals, and initiatives has been linked to rising social hostility. A 2022 global survey found that **61% of respondents** believed the **media perpetuates faith-based stereotypes**, and 43% said religion-related reporting contributes to public unease.⁴⁶

Recent surveys among Christians in the UK⁴⁷, Poland⁴⁸, and Spain⁴⁹ suggest that many **view media narratives as a key driver** of discrimination and aggression. The OSCE/ODIHR Guide on Anti-Christian Hate Crimes echoes this concern, warning that such crimes "do not occur in a vacuum" and that political and media discourse can reinforce anti-Christian bias.⁵⁰

Illustrative examples include German national media describing the Catholic prayer app *Hallow* as politically driven, portraying the Christian music group *O'Bros* as part of a covert proselytisation strategy, and implying that Christian athletes publicly thanking God may be engaging in a broader "missionary programme." These reports **framed missionary activity as inherently suspect** and overlooked the right to publicly express one's religion. In Spain, public broadcaster RTVE issued an apology after a programme described the growth of Evangelical churches as "worrying" and "dangerous."⁵¹

A high-profile case from Canada illustrates how unchecked narratives can translate into real-world consequences. Between 2021 and 2024, nearly **120 churches were vandalised or burned** following widely reported but unverified claims of "mass graves" at former Church-run residential schools.⁵² A national investigation later found no human remains after extensive excavation, yet the original narrative remained

uncorrected. Arson attacks more than doubled, and the Prime Minister referred to the destruction as "understandable," contributing to a broader climate of impunity.

These developments highlight the urgent need for balanced, responsible reporting and greater awareness of how religious stereotyping in the media can undermine social cohesion and public safety.



SYSTEMIC RELIGIOUS OPPRESSION IN RUSSIAN-OCCUPIED UKRAINE PERSISTS AND INTENSIFIES

As documented in OIDAC Europe's 2023 Report, **serious and systemic violations of religious freedom** have occurred in Ukraine's Russian-occupied territories since the beginning of the invasion in 2014. The ongoing conflict is deeply intertwined with issues of ethnicity, politics, and, inevitably, religion.

In 2024 and continuing into 2025, these violations have not only persisted but intensified. Fundamental freedoms continue to erode under occupation, with religious persecution taking various forms: the **kidnapping**, **torture**, **imprisonment**, and **murder** of religious leaders;⁵³ the banning of worship gatherings and **closure of communities**; the **prosecution of missionary activities**;⁵⁴ and the widespread purging of religious literature.

Russian occupation authorities have sustained and expanded a targeted campaign against independent religious life. The forced imposition of Russian law on Ukrainian territories and the requirement for religious organisations to re-register under occupation-approved authorities severely undermine religious autonomy. Communities that do not comply with **re-registration demands** face bans, closures, and restrictions on religious gatherings.

Ukrainian religious groups without official Russian registration are treated as illegal, effectively **criminalising many independent churches**. 55 Worship services are frequently disrupted or outright banned, and religious leaders are pressured to affiliate with state-approved religious institutions.

"Russian officials told us that worship services would only be allowed if we registered under Russian law. But the pastor would not be the one who served before the war; it would be someone they approved."

— Personal interview, Mission Eurasia No. 59



The Institute for Religious Freedom (Kyiv) reported that by mid-2023, at least **206 Protestant churches had been closed**, destroyed, or seized in Russian-occupied areas. ⁵⁶ According to the latest count of the Ukrainian Baptist Union, 110 out of 320 Baptist churches in occupied areas have ceased to exist – largely because pastors and members fled the occupation, and those remaining face intense pressure to stop meeting.

Occupiers have further made Ukrainian churches subject to Russia's restrictive 1997 Religion Law, **treating any unregistered religious activity as illegal**. The so-called "anti-missionary" amendments to the Russian Administrative Code (Article 5.26) criminalise religious activity not explicitly authorised by the state. These include missionary work by Russian or foreign individuals and even informal prayer meetings. Such legislation enables arbitrary arrests and prosecutions of clergy and lay believers engaged in peaceful religious practice.⁵⁷

On 28 April 2024, the Town Court in the occupied Luhansk Region fined Pastor Vladimir Rytikov 5,000 Russian rubles for a worship meeting held by his unregistered Baptist congregation—an event he did not even attend. "This is half of my [monthly] pension," he said.

- Forum 18

Religious expression is further suppressed through the **systematic banning and destruction of religious texts.** In 2024, occupation authorities removed thousands of books labelled "extremist" or undesirable from public libraries and places of worship, cutting off communities from their spiritual heritage. In Russian-controlled Luhansk, authorities banned at least 12 Christian books – including a Baptist commentary on the Gospel of John – as 'extremist', and occupation courts in Donetsk have ordered confiscated Bibles and hymnals to be destroyed as 'illegal literature'.

"Our church had a large library of Christian literature—more than 4,000 copies. When the prayer house was seized, all the literature was destroyed. The Russians simply threw it into the backyard of the church and burned it."

— Personal interview, Mission Eurasia No. 28

The intimidation and murder of clergy have created a pervasive climate of fear. This atmosphere severely restricts religious practice and jeopardises the survival of independent faith communities. According to the Ukrainian Ministry of Foreign Affairs, at least 67 clergy have been killed (sometimes during worship) or otherwise died due to Russian persecution and over 600 religious buildings damaged or destroyed in occupied areas since the 2022 full-scale invasion.⁵⁸

Analysts increasingly view religious persecution as a central component of the occupation regime's broader strategy. Arbitrary arrests and killings of clergy, mass closures of churches, bans on religious literature, and the imposition of registration under occupation-controlled bodies are not isolated abuses—they reflect a deliberate policy. In Russian-occupied Ukraine, religion is not merely collateral damage; it is a frontline issue in the region's escalating human rights crisis.



On 18 May 2024, Russian-occupied Donetsk officials raided Protestant pensioner Oksana Volyanskaya's home during a church hymn practice, seizing 15 hymnbooks and 10 Bibles. She was fined 10,000 Russian Roubles for "possessing religious literature without official registration". Russian courts frequently order confiscated religious books to be destroyed.

-Forum 18

PART II LEGAL RESTRICTIONS



INTRODUCTION

While religious freedom is enshrined in international human rights law, the full exercise of this right is unfortunately not always respected in practice. In recent years, Christians in Europe have faced **increasing restrictions on their religious freedom** and, in some cases, even criminal prosecution for the peaceful expressions of their religious beliefs.

As religious freedom rights cover a broad scope of provisions – including a private and public, individual and communal dimension – even laws that do not deal with religious matters at first sight can infringe upon religious freedom rights. The following section covers a **broad range of legislation** that has had repercussions on the free exercise of religious freedom in Europe.

1. Individuals Targeted for Expressing Religious Beliefs

International human rights bodies have repeatedly underlined the need to protect religious expression, which is protected under international human rights law. ⁵⁹ Resolutions of the Parliamentary Assembly of the Council of Europe have called on member states to ensure that "national legislation does not unduly limit religiously motivated speech," ⁶⁰ so that religious believers can "make their opinion publicly known without being subjected to censorship." ⁶¹

While public expressions of religion may be subject to limitations, these must meet strict legal criteria (ECHR, Article 9, para. 2). Yet across Europe, an increasing number of individuals are being **targeted for peacefully expressing their faith.** In some cases, courts have ultimately upheld their rights—but often only after lengthy and costly legal battles.

UK: Landmark Ruling Confirms Protection of Traditional Christian Worldview

In February 2025, the **UK Court of Appeal** ruled⁶² in favour of Christian teacher **Kristie Higgs**, who was fired in 2019 for sharing her concerns about a government policy on sex education for primary school pupils and for expressing her Christian beliefs about this topic on her private Facebook profile. The Court found her dismissal to be **unlawful religious discrimination** under the Equality Act, affirming that traditional Christian views—such as opposition to transgender ideology, gender fluidity, and the redefinition of marriage—are legally protected beliefs.

The ruling marks a significant step in safeguarding freedom of religion and speech for educators, amid a broader climate of disciplinary actions against teachers expressing Christian convictions.⁶³ In a related case, Welsh teaching assistant Ben Dybowski, who was fired after sharing his beliefs during a school seminar on diversity, has announced plans to appeal a recent tribunal ruling against him.⁶⁴



Screenshot: Interview with Kristie Higgs retrieved from YouTube, © Christian Concern

"Christians have the right to express their beliefs on social media and at other non-work-related settings without fear of being punished by their employer. Expressing biblical truth is not discriminatory. It is an expression of love and of light."

Kristie Higgs

Finnish Supreme Court Hears "Bible Tweet" Case

In October 2025, the Finnish Supreme Court heard the case of Member of Parliament **Päivi Räsänen**, who has faced prosecution since 2019 for alleged "hate speech" after **tweeting a Bible verse** and questioning how the Lutheran Church could reconcile its support for Helsinki Pride with biblical teaching. Authorities also investigated a 2004 pamphlet she authored for her church, titled *As Man and Woman He Created Them*, which outlines the Christian view of marriage and sexuality. **Lutheran Bishop Juhana Pohjola** was charged for publishing the pamphlet.

Despite two unanimous acquittals by lower courts, Päivi now enters her **seventh year of legal proceedings** following an appeal by the state prosecutor. Her case underscores the dangers posed by Finland's current legislation, which has enabled the **criminal prosecution of peaceful expressions of deeply held religious beliefs**.



Image: Päivi Räsänen outside the Court, $\ \ \, \mathbb{O}$ ADF International

"My case will show whether quoting the Bible can become a crime in a free country. No one should be censored for sharing the timeless truths of Scripture,"

said Räsänen following her Supreme Court hearing on 30 October.⁶⁵ A verdict is expected in 2026.

Ireland Drops Hate Speech Provision Over Human Rights Concerns

In September 2024, the Irish government **dropped proposed "hate speech" provisions** from its *Criminal Justice* (Hate Offences) Act 2024, citing concerns over threats to freedom of expression and religion. Critics had warned that the **undefined term** "hatred" could allow prosecutions of religious or moral views based on vague or subjective criteria.⁶⁶

Spain: Acquittal of Catholic Priest After Accusation of "Hate Speech"

In October 2025, a Spanish Court acquitted the Catholic priest **Fr. Custodio Ballester** who had been facing a legal battle since 2017 for critical comments he had made about Islam.

Malta: Christian Charity Worker on Trial for Sharing Personal Story

In February 2025, Maltese Christian charity worker **Matthew Grech** appeared in court for the tenth time after being charged with promoting "conversion practices" during a TV interview in which he shared his personal journey of leaving a homosexual lifestyle and embracing evangelical Christianity.⁶⁷

Although Grech spoke only about his own experience and how faith shaped his views, and did not promote therapy of any kind, he now faces over two years of legal proceedings and a possible five-month prison sentence.

"I'm in a criminal court for essentially sharing the hope of my Christian faith and what Christians believe,"

- Matthew Grech

France: Christian TV Programme Fined for Mentioning Abortion as "Cause of Death"

In November 2024, France's media regulator Arcom fined CNews €100,000 after a Catholic programme described **abortion as a "cause of death," citing WHO data**. Arcom claimed the broadcast violated requirements for honesty and accuracy. The decision has been widely criticised as politically motivated and a threat to freedom of expression and journalistic independence.⁶⁸

UK: Christian Midwifery Student Suspended for Expressing Conscientious Objections to Abortions

Sara Spencer, a Christian midwifery student in Scotland, was **suspended** from her NHS placement after sharing her **conscientious objection to abortion** in a private Facebook forum. Although cleared of any misconduct, faculty at her university continued to caution her against expressing "inappropriate" pro-life views, raising concerns about freedom of conscience and speech in academic settings.⁶⁹

2. Individuals Prosecuted for Praying under "Buffer Zone" Legislation

As in previous years, several individuals have been targeted and prosecuted for peaceful religious expression, including **silent prayer**, in public areas near abortion facilities under so-called **"buffer zone" laws.** Although these zones were introduced with the stated aim of protecting women from harassment, they have **increasingly been used to silence expressions of faith**—even when entirely non-verbal—raising serious concerns about freedom of religion and expression.

UK: Army Veteran Appeals Case after Being Convicted for Silent Prayer

In October 2024, the conviction of **Adam Smith-Connor** by a British court caused international concern. The army veteran and father was **found guilty** by Bournemouth Magistrates' Court for **silently praying in his mind** within a designated "buffer zone" 50 meters from an abortion facility. Mr. Smith-Connor did not speak to or engage with anyone, yet the court deemed his quiet posture—head slightly bowed and hands clasped—as an **expression of "disapproval of abortion,"** which is prohibited in the zone. He has appealed the conviction and is currently awaiting a hearing at the Court of Appeal.⁷⁰

In a speech at the Munich Security Conference in February 2025, U.S. Vice President J.D. Vance criticised UK authorities for prosecuting individuals like Smith-Connor for silent prayer and other peaceful expressions of religious belief.



Image: Adam Smith- Connor, © ADF International

UK Introduces Nation-wide "Buffer Zone" Legislation

Despite international outcry following Adam Smith-Connor's conviction, the United Kingdom enacted a nationwide "buffer zone" law in October 2024.

Section 9 of the Public Order Act 2023 (POA), mirroring similar provisions in Scotland⁷¹ and Ireland⁷², makes it an offence to intentionally or recklessly **"influence a person's decision** to access or facilitate abortion services at an abortion clinic" within 150 metres. Violations of this provision are punishable by an unlimited fine.⁷³

According to **official government guidance**, offences extend beyond vocal protests or leaflet distribution and may also include prayer. The government website explicitly **lists silent prayer** as a potential violation.⁷⁴

Individuals Prosecuted in the UK for Peaceful Religious Expressions in "Buffer Zones"

- In January 2025, the Crown Court found Christian preacher **Stephen Green** guilty and ordered him to pay £7,500 for **silently holding a Bible verse** in the proximity of an abortion clinic in London.⁷⁵
- In February 2025, Isabel Vaughan-Spruce was approached by police for standing silently in a "buffer zone". Officers told her that her "mere presence" was "causing people harassment."⁷⁶
- In March 2025, Pastor **Clive Johnston** stood trial for conducting an **open-air Sunday service** on the edge of a "buffer zone" in Coleraine, Northern Ireland. Although **abortion was not mentioned** during the service, he was accused of attempting to "influence" individuals entering the facility.⁷⁷
- In April 2025, 64-year-old Christian woman Livia Tossici-Bolt was convicted for holding a sign that read "here to talk, if you want" near an abortion clinic in Bournemouth.⁷⁸
- In August 2025, **Isabel Vaughan-Spruce** was investigated by police for the third time for silently praying near a clinic.⁷⁹

"I find myself again under investigation for the same prayers I have said for twenty years. Silent prayer cannot possibly be a crime – everyone has the right to freedom of thought."

- Isabel Vaughan-Spruce

"Prosecuting Pastor Johnston for preaching John 3:16 near a hospital on a quiet Sunday is an outrageous restriction on freedom of religion and freedom of speech. If the Gospel can be banned in this public place, where else can it be banned?"

- Simon Calvert, Deputy Director of The Christian Institute

Scotland: "Buffer Zone" Law Could Criminalise Prayer in Own Home

In September 2025, 75-year-old Christian grandmother **Rose Docherty** was arrested and criminally charged for the second time after holding a sign near a hospital reading, "Coercion is a crime. Here to talk, only if you want." The incident, within 200 metres of the facility, marked the first conviction under Scotland's far-reaching "buffer zone" law.⁸⁰



§ 4. Offence of influencing, preventing access or causing harassment etc. in safe access zone

- (1) A person who is in a safe access zone for protected premises commits an offence if the person does an act with the intention of, or is reckless as to whether the act has the effect of—
- (a) influencing the decision of another person to access, provide or facilitate the provision of abortion services at the protected premises,...
- § 5 Offence of influencing, preventing access or causing harassment etc. in area visible or audible from safe access zone
- (1) A person who is in a relevant area relating to protected premises commits an offence if the person—
- (a) does an act that is **capable of being seen or heard** by another person who is within the safe access zone for the protected premises,
- Abortion Services (Safe Access Zones) (Scotland) Bill, 2023

The law extends restrictions to private residences: following its adoption, the Scottish Government issued letters to residents within designated zones, warning that "activities in a private place such as a house" may fall under the law if visible or audible from outside.

When asked by a BBC journalist whether prayer in one's own home—if seen from the window—could be prosecuted, law sponsor Gillian Mackay MSP replied that it would depend on "who is passing the window."81



Image: Screenshot from BBC Interview

Landmark Ruling in Germany: Bavarian Constitutional Court Finds "Buffer Zones" Illegal

In September 2025, the **Bavarian Constitutional Court** ruled that blanket bans against peaceful prayer gatherings near abortion organisations are impermissible. The ruling came after the **city of Regensburg banned a prayer group** from gathering near a clinic, arguing that this was forbidden under a new law, which criminalises harassment of persons entering abortion facilities.

The Court held that **peaceful assemblies** which do **not involve harassment cannot be prohibited wholesale**, and that the law does not permit the creation of blanket "buffer zones." Restrictions on public gatherings, it emphasised, must be assessed on a case-by-case basis and are only justified in situations involving serious disruption or intimidation.⁸²

Spain and Netherlands: Arrests and Prosecution for Prayer and Leaflet Distribution

In **Spain**, over 20 individuals have **faced prosecution since 2022** for **peacefully praying near abortion clinics**. Although Spain has no formal "buffer zone" law, legislation criminalising "harassment of women" entering abortion facilities has been used by clinic operators to initiate legal proceedings against Christians praying or holding signs—even in the absence of any complaints from patients.⁸³

In the **Netherlands**, members of the Christian pro-life group *Kies Leven* have been detained while **peacefully distributing leaflets** outside abortion clinics. The group maintains that their actions are non-confrontational and intended to offer support to women.⁸⁴ These arrests have raised growing concerns about the disproportionate restriction of freedom of expression and religious freedom in public spaces.

3. DISCRIMINATORY TREATMENT AND RELIGIOUS AUTONOMY RIGHTS

International human rights law guarantees religious communities the autonomy to govern their internal affairs, including decisions about **membership**, **leadership**, and the establishment of religious **schools**, 85 and to practise religion regardless of official state recognition. 86 Under the principle of non-discrimination, states are also obligated to refrain from **unjust interference**. Despite these protections, several governments have encroached on religious autonomy rights in the past year.

Spain: Court Ruling Challenges Religious Autonomy of Brotherhood

In November 2024, the Spanish Constitutional Court ruled against the **male-only religious brotherhood** Real y Venerable Esclavitud del Santísimo Cristo de La Laguna in Tenerife for **refusing to admit a woman** as a member, claiming that the association's internal statutes violate the Spanish Constitution.⁸⁷

By subordinating the internal rules of a religious brotherhood to broader antidiscrimination norms, the Court risks setting a precedent that may erode the ability of religious associations to operate according to their foundational beliefs and maintain their distinctive identities without undue state interference.

Poland: Petition Calls for Ban on Confession for Minors

In October 2024, a **petition** was submitted to the Polish Parliament seeking to **prohibit** the Catholic sacrament of **confession for minors**. Although the proposal was ultimately rejected by the parliamentary committee in April 2025, it drew strong criticism for undermining religious autonomy rights. The petition framed the sacrament of reconciliation as a "traumatic event" that "prematurely confronts minors with the concepts of good and evil," revealing a clear bias against Catholic religious practice and raising concerns over attempts to **restrict** core aspects of **faith communities' internal religious life.**⁸⁸

France: Concerns Raised Over Application of "Abuse of Weakness" Law

In 2024, the trial of the Catholic *Missionary Family of Notre-Dame (FMND)*, reported by five individuals under France's "abuse of weakness" law, raised serious concerns about the law's application. During the proceedings, **court-appointed experts** reportedly described core aspects of religious life—such as **silence** and the **vows** of poverty, chastity, and obedience—as **"means of submission,"** revealing a clear bias against religious communities.⁸⁹

Article 223-15-2 of the French Criminal Code, amended in May 2024, criminalises the exploitation of a person's ignorance or vulnerability and carries penalties of **up to three years in prison.** While intended to prevent abuse, the law has drawn criticism for its vague wording, which may allow for misuse against legitimate religious practice.

The *U.S. Commission on International Religious Freedom (USCIRF)* has strongly criticised the French law, including attempts to include "psychological subjection" as a criminal offence, which enables disproportionate state interference and has already led to the unjust targeting of peaceful religious associations.⁹⁰

Romania: New Law Risks Criminalising Religious Leaders

In June 2025, the Romanian Parliament adopted a legislative amendment to the country's Law on Religious Communities, criminalising the "unauthorised exercise" of clerical or priestly functions. The new provision effectively grants the state and officially recognised religious denominations exclusive authority to determine who may lead religious communities. The amendment raises serious concerns regarding the free exercise of religion, particularly for minority faith groups and unregistered communities.⁹¹



Ukraine: UOC Ban Comes into Force

In August 2024, Ukraine adopted legislation banning the Russian Orthodox Church (ROC) and enabling courts to **dissolve the Ukrainian Orthodox Church (UOC)** unless it severs ties with Russia. In 2025, a government-commissioned report concluded that the UOC had retained links to Moscow and ordered the church to eliminate those affiliations. If it fails to comply, legal action could result in the UOC's dissolution.

In October 2025, **UN experts**, including the Special Rapporteur on freedom of religion or belief, expressed "serious concern at reports of ongoing persecution of the Ukrainian Orthodox Church (UOC) in Ukraine", warning that these actions restrict "freedom of worship and religious practice."⁹²

Religious freedom advocates have criticised the government's failure to acknowledge the UOC's 2022 **declaration of full independence** from the ROC⁹³ and raised concerns over the lack of ecclesiological expertise within the committee that conducted the government's investigation.

For documentation of religious freedom violations in Russian-occupied territories of Ukraine, see page 19-21.

Spain: Evangelical Community Reports Discriminatory Treatment

In May 2025, the Federation of Evangelical Religious Entities of Spain (FEREDE) lodged a formal complaint with the national ombudsman, citing ongoing discrimination against Evangelical Christians. One key concern involves **bans on Evangelical funeral services** in funeral home **chapels** in Talavera de la Reina and Ciudad Real, which have forced grieving families to hold ceremonies in makeshift, inadequate spaces or transport the deceased to church premises. Although local authorities previously pledged corrective action, effective solutions to prevent recurrence have yet to be implemented.⁹⁴



4. CRIMINALISATION OF CHRISTIAN TEACHING AND COUNSELLING

Overly broad laws on sexual orientation and gender identity that criminalise any form of "non-affirmative" treatment have increasingly raised concerns about the criminalisation of **private**, **non-coercive prayer** and **spiritual counselling**. Christian organisations warn these laws may even threaten historic Christian teachings.

Finland: Elderly Couple Convicted for Private Prayer

In March 2025, a **Finnish court** convicted an **elderly Christian couple** of "assault" after they **prayed with a young man** about his struggles with sexuality. The young man had voluntarily sought their support and participated in the prayer, yet the court upheld his claim that the prayers caused psychological harm.⁹⁵

The ruling has raised serious concerns: if non-coercive prayer in a voluntary, faith-based setting can constitute assault, **spiritual care** could become a **legal risk**. Faith leaders may become hesitant to offer prayer or counsel—even when explicitly asked—if such support can later be reinterpreted as harmful without evidence of coercion.

UK: Religious Leaders Warn New Law Could Criminalise Christian Teaching

In the United Kingdom, a proposed law aiming to ban "conversion therapies" has sparked fears that it could criminalise prayer, pastoral care, counselling, and even **preaching related to sexual ethics.** Critics argue that the draft's **vague language** and **lack of definitions** pose a threat to freedom of expression and religion.

In an open letter, over **1,000 church leaders** warned that the bill could **criminalise** "mainstream, historic Christian teaching on marriage and sexual ethics" and potentially make sharing the Gospel illegal in some contexts. Therapists have also expressed concern that treating children with gender dysphoria could be criminalised.⁹⁶

Spain: Catholic Dioceses Investigated Under Trans Equality Law

In January 2025, the Spanish Ministry of Equality launched an **investigation against** seven Catholic dioceses over alleged breaches of the 2023 Trans Equality Law when offering pastoral care, following a complaint by the Spanish Association Against Conversion Therapies. As the law contains very **vague wording**—criminalising action "aimed at modifying the sexual orientation or gender identity or expression of individuals, even with their consent"—it could be misused to prosecute individuals who offer pastoral care around issues of sexual morality.⁹⁷

Sanctions under the law include fines of up to €150,000 and exclusion from public funding. Spain's Parliament is also advancing an amendment to the Penal Code that would criminalise such actions with prison sentences of up to two years. The Federation of Evangelical Religious Entities of Spain has criticised the law for its vague language, warning that criminalising spiritual accompaniment constitutes a violation of religious freedom. 99



5. Religious Symbols and Manifestation in the Public Sphere

Although the public dimension of religious freedom clearly protects the human right to **manifest one's religion or belief in public,** the idea that religion should be confined to the private sphere continues to lead to restrictions in this area.

Germany: Court Bans Crucifix from Bavarian School

In August 2025, the Bavarian Administrative Court ordered the **removal of a crucifix from a state secondary school**, arguing that exposure to the symbol was "compulsory, recurring, and unavoidable," and thereby interfered with the negative dimension of freedom of belief.¹⁰⁰

The ruling diverges from the established jurisprudence of the **European Court of Human Rights (ECtHR)**. In *Lautsi v. Italy* (30814/06), the ECtHR—overturning an earlier Chamber judgment—**upheld the presence of crucifixes** in Italian public school classrooms. The Court concluded that the symbol was passive and non-coercive. However, the Court also reaffirmed that states enjoy a "margin of appreciation" in determining how to balance religious expression in public institutions.

The Bavarian court's decision has raised human rights concerns as its **interpretation of state "neutrality"** effectively frames the visible expression of religion in shared civic spaces as unconstitutional, thereby establishing a precedent for restricting religious presence in the public sphere.

France: Court Orders Removal of Nativity Scene

In December 2024, an administrative court ruled that the town of **Beaucaire** must **remove a nativity scene** from its town hall, citing a breach of secularism laws. The mayor refused to comply, prompting additional legal action and threats of escalating fines.¹⁰¹

Spain: Crosses Removed Under Law of Democratic Memory

In October 2024, a **memorial cross in Neda** was dismantled under Spain's *Law of Democratic Memory*, which mandates the removal of Francoist symbols. While the law requires only the removal of **political plaques**, some municipalities have **taken down entire crosses.** This practice continues despite a recent court ruling that held that removing crosses stripped of political meaning was unjustified.¹⁰²

Italy: Ban on Funeral Processions Raises Concerns

In November 2024, the mayor of Manduria issued an order **banning all on-foot funeral processions**, citing logistical concerns. The measure, which also affected traditional funeral bands, significantly restricted religious expression and has been challenged by a local councillor as a violation of religious freedom.¹⁰³

UK Municipality Proposes Ban on Preaching and Prayer in Public

In March 2025, Rushmoor Borough Council sought a court order to **ban Christian preaching, prayer**, and **leaflet** distribution in public spaces after receiving complaints from individuals who reported feeling "alarmed" or "distressed." Following public backlash and consultations with Christian groups, the Council **dropped the proposal** and instead committed to working on a voluntary code of conduct.¹⁰⁴

"We welcome the news that the council has withdrawn its application, but it is highly concerning that they made this attempt to criminalise the Christian faith in the first instance."

- Jamie Broadey, evangelist

In a related case, a Christian **street preacher** was prosecuted but later acquitted for preaching about differences between Islam and Christianity.¹⁰⁵ Other preachers have reported police interventions and **alleged two-tier policing** against Christians,¹⁰⁶ including an instance where a London police officer told Christians to stop preaching, saying it would be "wrong."¹⁰⁷

Norway: New Education Law Bans "Preaching" in Schools

A new *Education Act* that came into force in August 2024 prohibits proselytising in schools, including during religion classes. This preaching ban has led to confusion as no definition of the forbidden action of "preaching" was provided.

In November 2024, public schools in Trondheim received a letter from the municipality stating that **attending a church service** with pupils was **no longer allowed.** Many Norwegian schools reacted by **cancelling Christmas services.** Although the Education Minister later clarified that voluntary services are still permissible, the lack of clarity has created legal insecurity and may deter educators from accommodating religious traditions.¹⁰⁸

France: Teacher Sanctioned for Using Religious Poems in Class

In September 2024, a teacher in Carcassonne was **sanctioned** for including **poems about St. Bernadette** in an Occitan language class. Despite their **cultural and linguistic** relevance, a court upheld the disciplinary action, citing a violation of secularism laws.¹⁰⁹



6. PARENTAL RIGHTS AND RELIGIOUS EDUCATION

International human rights law affirms the right of parents to ensure their **children's education aligns with their religious convictions**, including the right to establish and access religious schools. However, in several European countries, these rights are being curtailed through discriminatory policies and legal decisions. One of the common themes is that secular education is viewed as "neutral" as opposed to religious education.

Spain: Constitutional Court Bans Father From Reading Bible to Son

In May 2025, Spain's Constitutional Court rejected the appeal of an evangelical father seeking to share his religious beliefs with his son. The Court upheld earlier rulings that **prohibited** him from **taking the child to church** or **reading the Bible** with him, and granted the secular mother exclusive authority over the child's religious upbringing until the age of twelve.

By prohibiting a parent from accompanying their child to church or engaging in religious education at home, the Court's decision raises serious concerns about the right to ensure the religious and moral education of one's child in accordance with one's convictions. It also appears to grant one parent the power to veto the religious expression of the other, effectively **privileging a secular moral framework** over a religious one for the formative years of the child.¹¹⁰



Sweden: Christian Parents take Child Custody Case to the ECtHR

Christian parents have taken their case against Sweden to the European Court of Human Rights (ECtHR) after being **separated from their two eldest daughters** for more than two years. Their lawyers have raised serious concerns about delays, overreach, and possible discrimination against Christians in Sweden's child welfare system.

The two eldest daughters of the Christian couple were seized by Swedish child protection services after the eldest made a false report at school, triggered by her parents' refusal to allow her a mobile phone and the use of makeup. Despite later retractions and **no evidence of wrongdoing**, Swedish authorities **continued custody separation**, allowing the parents only one supervised visit a month.

This case follows a number of similar cases of **systemic violations in family separation** and child welfare cases in recent years, which have raised serious concerns about child protection services, particularly in **Norway, Sweden**, and the **Netherlands**.¹¹¹

Switzerland: Catholic Girls' School Denied Public Funding

In January 2025, the Swiss Federal Court of Lausanne ruled against the Catholic girls' school Saint Katharina of Wil, banning it from receiving public funds. The Court argued that being a **Catholic school reserved for girls**, the school would practise "discrimination".

Despite the fact that **none of the religious activities** in the school curriculum are compulsory, three of the five judges argued that the pupils were nevertheless being "strongly guided" towards the Catholic faith, which, in their view, violated the principle of "neutrality".¹¹²

France: Religious Schools Excluded from Erasmus+

In April 2025, the European Commission responded to concerns that private schools in France, including Protestant and Montessori institutions, had been excluded from **Erasmus+** mobility programmes. While the Commission reaffirmed its inclusivity mandate, it acknowledged that national rules define participation criteria, potentially **allowing the exclusion of faith-based schools.**¹¹³

UK: Sudden VAT Policy Threatens Christian Schools

In January 2025, the UK government imposed **VAT on private school tuition**, a move that is unprecedented in the UK, where education has never been taxed. This has been criticised as an unlawful discrimination against faith-based education.¹¹⁴ Many **Christian schools** now face closure or **fee hikes**, reducing parental choice.

Christian parents have launched a judicial review, arguing that the policy disproportionately impacts parents who have chosen Christian schools and **breaches anti-discrimination laws.**¹¹⁵ The High Court heard the case in April 2025.¹¹⁶

"The introduction of VAT represents an existential threat to the school. We do not have reserves to cover the extra outlay and will have to pass it on to parents. Our parents are generally not wealthy, and we do not know how many will not be able to afford it or who will fall into arrears."

- Caroline Santer, Headteacher at The King's School

Slovakia: Christian Schools at Risk after School Funding Reform

The Slovak government has introduced a proposal to reform state subsidies for private and church schools. Under the **new policy**, full funding would be limited to schools that meet specific public-service criteria, including enrolling at least 70% of students from local school districts and signing contracts as public education providers.

Church school associations and the **Slovak Bishops' Conference** have warned that the proposed changes could exclude many Christian families whose children currently attend faith-based schools outside their district. They further stress that financial pressure could **force schools to abandon their religious character** or close altogether.¹¹⁷



7. FREEDOM OF CONSCIENCE

Freedom of conscience—described as the ability to shape one's life in accordance with one's moral or religious convictions¹¹⁸—holds a particularly protected status under international human rights law.¹¹⁹ A core component of this right is the freedom of **conscientious objection**: the right to refrain from actions that fundamentally conflict with one's deeply held beliefs. This protection extends not only to **individuals** but also to **institutions**, such as religious hospitals or schools, which seek to operate in accordance with their ethical or faith-based values.

UK: Catholic Hospices Face Closure Following Assisted Suicide Law

Following the passage of the *Terminally III Adults* (*End of Life*) *Bill* in June 2024, **UK Catholic hospices fear closure** for **refusing to participate in assisted suicide.** The law lacks provisions for institutional conscientious objection, threatening faith-based care facilities.

This bill, if fully enacted, would compel Catholic palliative care institutions that refuse to participate in assisted suicide on the basis of conscientious objections to **either comply or face closure**, raising deep concerns over the protection of institutional conscientious objection.¹²⁰

"Institutions whose mission is to provide compassionate care may have no choice but to withdraw."

- Cardinal Vincent Nichols and Archbishop Sherrington.

Spain: Government Plans List of Conscientious Objectors

In 2025, the Spanish government proposed creating **registries of medical professionals who conscientiously object to abortion.** Though said to be confidential, doctors fear the data could be used to discriminate in hiring, especially in a system reliant on temporary contracts.

It is also feared that these registries will undermine the constitutional right to conscientious objection and deter healthcare professionals from acting according to their beliefs.¹²¹

Sweden: Conscientious Objection to Same-Sex Wedding Cake Declared Unlawful

In May 2023, a **Christian-owned bakery** in Sweden declined to create a **wedding cake for a same-sex couple**, citing their belief that marriage is between a man and a woman. The bakery clarified that the couple **could have ordered any other cake**, but not one specifically for a wedding, underscoring that the decision was based on **religious convictions** rather than hostility towards a specific sexual orientation. After a two-year review, the Swedish Discrimination Ombudsman acknowledged that the bakery's stance was rooted in fundamental freedoms but nonetheless concluded that the refusal amounted to unlawful discrimination.¹²²



CONCLUSIONS

This report examines various challenges faced by Christians in contemporary European society and analyses the underlying root causes, ranging from social hostility and hate crimes to less visible issues such as discriminatory treatment and restrictions on religious freedom.

With regard to **anti-Christian hate crimes** in Europe, the research presented in this report shows that the highest number of incidents was recorded in France, the United Kingdom, Germany, and Spain.

The slight decrease in the total number from 2,444 in 2023 to **2,211 in 2024** appears to be largely linked to lower figures reported by UK police, which noted a change in methodology in its official report. A modest decline in recorded incidents in France also contributed to the overall drop. However, figures from the first half of 2025 show a renewed increase in incidents in France.

Despite the general decrease, personal attacks rose from 232 in 2023 to **274 in 2024**— even though no official data on personal attacks were available from France and the UK for 2024.

Christians also continue to experience **discrimination** on the basis of their religious beliefs. In particular, traditional Christian beliefs—such as the view that God created human beings as male and female for one another—may be **labelled** as 'discriminatory', even where no act of discrimination has occurred. The mere expression of such beliefs can result in disciplinary measures, including interrogation, suspension, or dismissal.

A landmark ruling by the **UK Court of Appeal** found that the dismissal of a Christian teacher after expressing concern and sharing her Christian perspective regarding her son's primary school sex education classes constituted unlawful religious discrimination under the Equality Act. The Court also affirmed that **traditional Christian views**—such as opposition to transgender ideology, gender fluidity, and the redefinition of marriage—**are legally protected beliefs** under international and domestic human rights law.

Other **legal restrictions** impacting the right to freedom of religion or belief include prohibitions on public prayer and religious manifestation, prosecutions for expressions of religious belief, interference in religious autonomy and parental rights, and limitations on the right to conscientious objection.

As in previous years, several Christians were **criminally charged** for peacefully displaying Bible verses, engaging in voluntary faith-based conversations, or even **silently praying** near abortion facilities designated as "buffer zones." Others faced legal action for peacefully expressing their religious convictions or articulating traditional Christian teachings on matters of sexual ethics.

To prevent such infringements on the right to freedom of religion or belief, States should carefully review domestic legislation and ensure that **vague or overly broad legal provisions**—particularly in "hate speech" laws—are not used to **criminalise non-violent expressions of religious belief.** Where applied without precision, such laws risk undermining pluralism and the democratic values enshrined in international human rights standards.

With increasing secularisation contributing to widespread **religious illiteracy** among public officials and the growing influence of secularist norms, Christians in Europe continue to encounter restrictions on the exercise of their religious freedom, including the right to express beliefs on fundamental questions of human identity, dignity, and relationships. Public awareness and policy-level engagement are therefore more crucial than ever.

By providing data and a comprehensive human rights analysis of these developments, **OIDAC Europe seeks to contribute** to the protection of freedom of religion or belief for Christians and for all individuals and communities. As freedom of thought, conscience, and religion is a cornerstone of democratic society, **we urge States not to compromise these rights**, but to uphold and strengthen them—ensuring open, pluralistic, and peaceful societies across Europe. of these fundamental rights, and thus ensure an open and peaceful climate in our societies.



RECOMMENDATIONS

Based on the findings of this report, OIDAC Europe puts forward the following recommendations to governments, international institutions, and civil society actors.

Recommendations to Governments of European Countries:

- → Safeguard the rights to freedom of religion or belief, expression, assembly, and conscientious objection for Christians. **Avoid vague or overly broad language** in legislation that could lead to the criminalisation of peaceful expressions of religious belief in the public sphere.
- → Strengthen **consultation and communication** with religious communities and civil society organisations when drafting legislation that could directly or indirectly affect the religious freedom of Christians.
- → Collect **disaggregated data** to specifically monitor intolerance and discrimination against Christians, and implement appropriate soft-law measures to respond to this phenomenon.
- → Implement the recommendations outlined in the **OSCE/ODIHR practical guide**Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of
 Christian Communities.
- → Promote **religious literacy** among public officials, policy-makers, and state media representatives to ensure fair and informed representation of religious views, and the safeguarding of religious freedom rights.

Recommendations to International Human Rights Institutions:

- → **Monitor and report** on incidents of intolerance and discrimination against Christians, and provide member states with relevant recommendations and guidance.
- → Review and refer to **national and international reports and guidelines** particularly the OSCE/ODIHR practical guide *Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities*—when addressing hate crimes and religious discrimination.
- → **Identify gaps** in the protection of freedom of religion or belief and advise member states on necessary measures to ensure the full realisation of these rights for religious individuals and communities.

Recommendations to the European Union:

- → Create the position of an **EU Coordinator combating anti-Christian hatred**, with comparable responsibilities, visibility, and financial support to those of the EU Coordinators on antisemitism and anti-Muslim hatred.
- → Refrain from adopting legislation that lacks **legal clarity** and may unduly restrict freedom of expression, association, or religion.
- → Review existing EU legislation to identify and eliminate any direct or indirect forms of discrimination against Christians.

Recommendations to Journalists, Opinion Leaders, Artists, and Other Public Figures:

- → Report responsibly and raise public awareness of anti-Christian hate crimes and social hostilities.
- → **Avoid misrepresentation** or the reinforcement of negative stereotypes about Christians. Acknowledge the responsibility to foster a tolerant, respectful public discourse.
- → Apply the same **journalistic and ethical standards** when reporting on Christians as are applied to other religious or minority groups.

Recommendations to Christian Churches and Individuals:

- → **Educate** Christian communities about their rights under national and international human rights frameworks, and respond appropriately to unjustified restrictions on the free practice of faith.
- → Raise awareness about secular intolerance and the risk of **self-censorship** among Christians. Encourage individuals to continue sharing their faith with confidence and clarity.
- → Participate in **public discourse respectfully** and constructively, contributing to dialogue between religious and secular sectors of society, and helping to build mutual understanding across different worldviews.different groups.

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