

Is the UK Constitution Really a Secular?

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Abstract: *It is interesting to note that the British society, which bears a symbol of secularism, owns an uncoded constitution that possesses significant religious characteristics, pertaining not only to a particular religion (Christianity) but also to a particular denomination (protestant). These constitutionally evolved religious features are generally neglected in the British constitutional discourse and debates for the reason that the British constitution is presumed to be a secular constitution whereas the facts state otherwise as it bears several significant historical statutes which mark its religious relevance. Moreover, such a presumed impression of constitutional secularism of the UK tends to be generally misleading various circles and quarters of the Pakistani society; which may potentially result into a motivation for socio-political campaigns in Pakistan for the same pursuit based on the misunderstood constitutional position of the UK. Thus, this article attempts to highlight those significant religious documents, Acts and conventions which provide ample evidence that the UK constitution is not a secular constitution for several reasons such as its historical recognition for deep-rooted nexus between the constitutional monarchy, Parliament and Established Church of England and Scotland. In addition, the legal framework of the UK also contains strong and significant religious representations in all the three military forces, state-funded schools and prisons across the UK.*

Keywords: Religion, Constitution, Separation, Church, Monarch, Bishop, Parliament

Introduction

United Kingdom is a collective name of four distinct states namely England, Scotland, Wales and Northern Ireland whereas Great Britain is a combination of three states namely England, Scotland and Wales excluding Northern Ireland. Constitutional integration of the United Kingdom began by a statute (Act of Union, 1535) followed by another statute (Act of Union, 1542) which was passed to complete the process of integration of Wales with England. By these statutes, English law and administration was established in Wales while ending Welsh legal distinction. Likewise, Scotland united with England by another law (Act of Union, 1707), whereby two distinct kingdoms merged to form Great Britain. The reason for the merger of the two kingdoms was that James VI of Scotland had inherited Queen Elizabeth of England as “James I” in 1603, for being her closest rightful relative. Since then, the two distinct kingdoms were reigned by a single monarch for over a century which culminated into a constitutional merger of both the kingdoms by the above-cited ‘Acts of Union’ passed by both the Parliaments in 1707, whereby the Scottish Parliament was abolished and merged into a new Parliament which was established in Westminster, London and included Scottish Parliamentary representation as well. However, the Scottish distinct legal system along with her religious and educational framework remained intact after the union of the two kingdoms for the reason that the Scotland has partial codified system whereas England and Wales follow common law system which is based on judicial precedent.

Similarly, pursuing further integration, Ireland was also acceded to Great Britain under a legal Act (Act of Union, 1800). Thus, by the above merger and constitutional integration, the country became the United Kingdom of Great Britain and Ireland or the UK in short.

However, subsequently, Ireland was partitioned in Northern Ireland (consisting of six counties) and Southern Ireland (consisting of 26 counties) with self-governing status under a new law (Government of Ireland Act, 1920). However, Southern Ireland did not concede the treaty and went on war until another

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treaty was signed (Anglo-Irish Treaty, 1921), whereby 'Irish Free State' was established as an independent dominion but not as a "republic" until 1948 when the Irish Dominion was declared a Republic under an Act (Republic of Ireland Act, 1948), whereby the Republic was removed from the British Commonwealth. Thus, Southern Ireland gained a sovereign status excluding Northern Ireland which remained intact with the United Kingdom with a devolved system of government, i.e. home rule/self-rule.

Despite the integration of the states into a kingdom, all the three territories, namely Wales, Scotland and Northern Ireland have their own Parliaments whereas the British Parliament, based in London, exercises its legislative powers in the reserved subjects such as defense and foreign policy. The National Assembly of Wales and the Northern Ireland Assembly were established in 1998 whereas the Parliament of Scotland which was abolished by 'Act of Union, 1707' was restored by another statute (Scotland Act, 1998). The first meeting of the Scottish Parliament was convened on May 12, 1999, since 1707 for the Scottish people favored for its restoration in a referendum held in 1979.

As far as Church of England is concerned it was historically governed by the Pope of Rome who would be the head of the Church until 1530s when king Henry VIII became the first Supreme Head of Church of England by a statute (Act of Supremacy, 1534). The reason for the king assuming headship of the Church was that he had removed the Pope from the headship of Church of England with the help of the English Parliament for the reason that the Pope was not giving him permission to annul his marriage with the queen Catherine of Aragon and to marry Anne Boleyn in pursuit of a legal heir who would succeed his throne for he was childless.

Although subsequently, Rome's jurisdiction was restored in 1553 by Queen Mary I, yet it was reversed by the succeeding Queen, Elizabeth I in 1558 as she became the first "Supreme Governor" of Church of England under a law (Act of Supremacy, 1558). She assumed this title as it bore less authoritarian character to appease both the protestants and the catholic and to avoid the charge of assuming a spiritual role, reserved for Christ. Thus, all the authority and powers of the Roman Catholic Pope of Vatican City were abolished by the two Acts of Supremacy, passed by the English Parliament successively.

Church of England has its administrative headquarters in Westminster, London while Canterbury cathedral, the principal church in Southeast England, is its mother church, which was built by St. Augustine, a monk, who was sent by Pope Gregory of Rome to evangelize Anglo-Saxons in 597 AD. Thus, the archbishop of Canterbury is also the spiritual leader of the Church of England (www.churchofengland.org).

It is noteworthy that the constitutional-religious framework of the UK is not codified in a single document rather it is spread in conventions, common law and statutes evolved over the centuries and is discussed and analyzed as under.

Constitutional Integration of the Crown and Church of England

It is interesting to note that the UK monarch is the Supreme Governor of Church of England and takes an oath as a defender of the 'Protestant faith' and Church of England (Act of Supremacy, 1558). Thus, he is concurrently head of the kingdom as well as head of the Principal Church, rendering no formal separation between church and the kingdom. Moreover, the monarch is required to be a member of Church of England and plays a constitutional role and not merely a ceremonial one. For example, he appoints all one hundred and eleven bishops in England, based on the recommendations of the Crown Nominations Commission and the Prime Minister (James and Hazell, 2024). The Monarch is also crowned by the archbishop of Canterbury at the coronation ceremony as well as anointed by him being purely a religious ceremony. In addition, the archbishop of Canterbury is not only the spiritual leader of the Church of England but also the supreme spiritual leader of the Anglican communion worldwide (www.churchofengland.org).

A. Monarch's Sectarian Orientation

The Monarch is constitutionally required to be a protestant and cannot be a Roman catholic (Act of Settlement, 1701) nor can he be married to a Roman catholic and also required to be in communion with Church of England. However, a recent law (Succession to the Crown Act, 2013) has waived the condition of

‘not being married to a Roman catholic’ as was required by the previous Act of Settlement, 1701. Furthermore, the ‘Act of Union, 1707’ requires the monarch to be the source of protection of Protestant Religion, Worship, Doctrine, Discipline and Government of Church of England for ever.

B. Constitutional Nexus Between the British Parliament and Church of England

Lords spiritual who are the most senior Anglican bishops of Church of England sit and vote in the House of Lords as well as lead the prayers in the start of each day of sitting in the House and participate in legislation process. They are twenty-six in total as fixed by law and retire from the House at the age of 70. There are other religious leaders who are given membership in the house of Lords by virtue of their professional or personal caliber or contribution to the society.

Moreover, from other faiths, religious figures are also conferred membership of the House of Lords on their notable contribution to the society. Such persons of high ranking are called Lords Temporal and are appointed as life peers under a law (Life Peerages Act, 1958). However, they do not have automatic right to sit in the House unlike the Lords spiritual.

C. Parliamentary Oversight and Internal Legislature of Church of England

Prior to 1919, the constitutional position of the Church of England was different as the British Parliament had direct control over the legislation related to the affairs of the Church of England, whereas the Church did not have its own legislative house. Thus, all the recommendations related to Church of England would be tabled in the Parliament for approval to become a law in the past. This direct parliamentary control over Church of England had caused controversies and one such occurred in 1920s when Church of England rejected the prayer book proposed by the Parliament.

Therefore, subsequently, an Act (Church of England Assembly (Powers) Act 1919) was passed to enable the Church to have its own assembly for internal legislation on church matters called ‘Measures’. These Measures then would be presented to the British Parliament for approval and royal assent to become a UK law.

Moreover, later, a new law was passed to grant Church of England a certain degree of self-governance (Synodical Government Measure, 1969). This synodical law replaced the Church Assembly with the General Synod, a greater and more powerful legislative body which consists of three houses namely House of Bishops, House of Clergy and House of Laity (laity are those members of a church who are not ordained clergy/Layman). Once a Measure is passed by the General Synod it is presented to the Parliament for approval without its power for amendment though it may reject the Measure in its entirety and send back to Synod for amendment and re-approval. Thus, once a Measure is passed by the Parliament and assented by the monarch it becomes a law (synod derived from the Greek *synodos*, meaning "assembly" or "meeting").

The General Synod can also pass canons (church laws) related to internal church affairs. For canon to become a law no British parliamentary approval is required though license and royal assent is prerequisite for it. The Synod also holds power to block any measures proposed by the British Parliament. One such instance occurred in 2012 when the Parliament proposed a measure for ordination of women as bishops which was blocked by the Synod as the two-thirds majority, required for the proposal, could not be achieved in each of the three houses of the Synod despite the strong support of the British Parliament for the measure (Davies, 2012). However, the measure was passed in 2014 after further debate and discussion.

D. Constitutional Participation of Church of England In State Institutions

Chaplains and other multi-faith religious figures are actively present and participate to promote over all spiritual well-being of the military staff of the UK including the Royal Navy, British Army and the Royal Air Force. Chaplains are commissioned officers and their military services are recognized by royal warrants. For example, the Army Chaplain’s Department was established by a royal warrant in 1796. Later an Act (Army Chaplains Act, 1868) was passed for greater facilities for ministration of the Army’s chaplains. In recognition to the Chaplain Department’s extraordinary services and sacrifices during World War I, the

king granted the department a prefix 'royal'. Thus, since then it is called the 'Royal Army Chaplain's Department via an Army Order in 1919.

Likewise, under a Prison law (Prison Act, 1952) it is mandatory for every prison in England and Wales to have a chaplain from Anglican faith (Church of England). Such religious governing bodies further develop multifaith teams to cater diverse religious needs of the prisoners and overall spiritual well-being (<https://prisonreformtrust.org.uk/>).

Similarly, laws against discriminations (Equality Act, 2010) require all National Health Service (NHS) organizations (<https://www.churchofengland.org/>) to support and facilitate for the religious observances of the patients and staff within the working hours and the working environment without discrimination of religion (<https://www.england.nhs.uk/>).

Constitutional Link Between the Monarch and Church of Scotland

Church of Scotland was established by statutes (Confession of Faith Ratification Act, 1560) and (Papal Jurisdiction Act, 1560) following the adoption of Protestant Confession of Faith by the Scottish Parliament in that year. However, another law (General Assembly Act, 1592) was passed for ratification of the structure and liberties of Church of Scotland. Thus, the Church of Scotland also holds a constitutional framework. The monarch takes oath for protection of the Church of Scotland on his coronation but unlike the Church of England, he does not assume the role of "Supreme Governor" of this Church though he holds its ordinary membership. The monarch's further constitutional role is that he appoints a Lord High Commissioner to the General Assembly of the Church of Scotland (which is the supreme court of the church). The High Commissioner personally represents the monarch in the annual meetings of the Church and reports back to the monarch about its proceedings personally. The Lord High Commissioner though delivers opening and closing address yet he has no power to influence the debates current in the assembly by way of participation nor can he vote (<https://www.royal.uk/lord-high-commissioner-general-assembly-church-scotland>). He officially visits various charities and community projects in Scotland and maintains a link between the Church and the State.

In addition, a centuries-long dispute was resolved between the Church of Scotland and the British Parliament by an enactment (Church of Scotland Act, 1921). By this legal Act, complete freedom was given to the Church in "Spiritual matters" subject to no civil jurisdiction of courts nor the government or the legislature of the State. Resolutions of various long-standing disputes of the Church of Scotland with the British Parliament further facilitated reunion of the Church of Scotland with the United Free Church in 1929 (this church was established as a result of "Great Disruption" of 1843, when approximately one-third of ministers and congregations left the established Church of Scotland to form the Free Church of Scotland).

Church of Scotland, Act, 1921 also empowered the Church to legislate and adjudicate the matters related to it such as its Doctrine, Discipline, Worship and Government (www.legislation.gov.uk). This Act is in fact a constitutional document for recognition of the Church of Scotland's right to self-governance in spiritual matters including legislative and adjudicative rights, being independent of the state control.

However, in *Percy v Church of Scotland Board of National Mission* (2005) (<https://publications.parliament.uk/pa/ld200506/ldjudgmt/jd051215/percy.pdf>), in which Percy, a Church Associate Minister, was alleged for having an affair with a married elder. In pursuance of the investigation and findings, she was asked to resign. However, she filed a suit against the Church in an Industrial Tribunal under a claim that the Church's conduct was not similar in similar circumstances where a male minister had extra martial sexual relationships. It has been argued by some that this is potentially a case of gender discrimination.

The outcome was that the civil jurisdiction of the court was asserted in the matters between the Church of Scotland and its servants as the latter having been legally recognized employees of the Church. Thus, the relationship between the Church and its staff was first time recognized that of employer and employee under a civil contract and employment law. Prior to this landmark judgement of the House of Lords, the relationship of the minister with the Church was traditionally treated a 'spiritual one'. The House of Lords

observed in this case that a claim under gender discrimination is not a “matter spiritual” under the Church of Scotland Act, 1921 and it certainly falls within the civil jurisdiction of the court of law thus overriding the internal jurisdiction of the Church in this particular matter.

Church of Wales and the Kingdom

Historically, Church of England was the Established Church in Wales since 1530s. However, it was disestablished in 1920 as a result of a long campaign which began in nineteenth century and culminated in a legislation (Welsh Church Act, 1914) whereby a new church was established in Wales. According to this Act, the crown was disempowered from appointments of bishops in Wales. Likewise, the bishops were disentitled to sit in the House of Lords. Although the Act was passed in 1914 but the new Church was established in Wales in 1920. The delay was caused due to the outbreak of the World War I in 1914 which ended in 1918. Thus, Welsh Church is an independent and self-governing institution with its own system of law and constitution.

Apart from the Church of England and the Church of Scotland which are constitutionally established churches by the statutes, there are other churches which are although religious institutions yet not required to be registered as religious bodies in the UK unlike many other European countries. They can apply to be registered as charity bodies. Thus, they are governed by general laws of charity and particularly those of charitable trusts. The church properties may be held by trustees which may be registered companies under the secular laws. Charities law (Charities Act, 2011) recognizes “advancement of religion” as one of the charitable purposes thus the churches can operate as charitable and voluntary associations.

Generally, churches are unincorporated associations, meaning thereby that the trustees of the church are personally liable for debts of the church or breach of contract by it. However, trustees are usually indemnified by the church assets and properties. At the same time, the church may be registered as “Charitable Incorporated Organizations (CIO)” whereby the trustees will stand liable under limited liability of the CIO (Charities Act, 2011).

Judicial Role in Balancing the Religious Sensitivities

In the United Kingdom, and so also in many western countries. there is an ongoing debate and discussion about neutrality of the State towards religion. The tension is often defused and resolved by the courts of law where cases relate to such sensitivities as religious dress code or the church’s refusal to provide religious services to same sex couples etc.

For Example, in *Eweida v British Airways* (2013), Nadia Eweida, who was an employee of the British Airways was dismissed on the ground that she did not conceal a small visible cross, she was wearing, in compliance with the company’s uniform policy. European Court of Human Rights ruled that the UK failed to balance between the employee’s right to observe her religion and the employer’s desire to keep a particular corporate image and gave a judgement in favor of the employee.

A different ruling was given by the European Court of Human Rights, in *Chaplin v Royal Devon and Exeter NHS Trust* (2009). Fact of the case is that Shirley Chaplin, a nurse, was asked to remove her cross while handling the patient to avoid any injury which could be caused by wearing the cross. European Court of Human Rights ruled that the instruction to the employee for removal of the cross was justified on the ground of security and well-being of patients.

Similarly, in *Ladele v London Borough of Islington* (2009), Lillian Ladele was dismissed from her employment on the ground that she refused to conduct civil partnership ceremonies of the same-sex couple on the citation of her belief. She was a registrar to register births, deaths and marriages. European Court of Human Rights held that the employer’s aim was legitimate to provide services without discrimination to public, hence the dismissal was upheld. This case goes on to somewhat establish secularism of the executive branch in the government, as well as the court’s deference to secular ideals, when it comes to public services.

Thus, the above cases highlight that the right to freedom of religion is a qualified right in the UK statutory framework, meaning thereby that its scope is limited to ensure safety and security of others and

their freedoms simultaneously. This is also noteworthy that the right to freedom of religion is incorporated in article 9 of the European Convention on Human Rights.

Socio-Religious Framework in the UK

A. Faith-Based Schools

Apart from Established Churches of England and Scotland and their constitutional integration and nexus with other constitutional institutions, there is a large number of faith-based schools across the UK which specialize in religious education. Moreover, the non-faith-based school or secular school are also required to incorporate religious studies in their curriculum albeit not of a particular faith or religion (Education Act, 2002). The faith-based schools are also allowed discretion based on their specific religion and sectarian orientation. For example, the anti-discrimination law (Equality Act, 2010) which protects its citizens from discrimination in education and employment on the basis of creed, however, provides exemption to the state-funded faith-based schools to employ the staff belonging to specific creed and also to admit those students who share common creed with the admitting school.

B. Compulsory Religious Education

Around one-third of all the state-funded schools in England and Wales are faith-based school (<https://humanists.uk/campaigns/schools-and-education/faith-schools/>). In addition, all the state-owned schools whether faith-based or secular, are legally required to hold a daily collective worship (School Standards and Framework Act, 1998). However, there is a parental right to withdraw their children from the daily collective prayer under 16. If such a request is made by the parents the school is bound to arrange an alternative assembly of the same standard. Similarly, pupils above 16 can also obtain withdrawal from such daily collective worship (School Standards and Framework Act, 1998).

C. Freedom of Religion

Although the religious institutions can employ affirmative action regarding admission of the students and employment of the staff on the basis of their creed yet freedom of religion, thought and conscience is protected for all individuals under the British Human Rights law (Human Rights Act, 1998). Here the point to underscore is that article 9 of the 'European Convention on Human Rights' has been incorporated into 'Human Rights Act, 1998'. This implies that the State cannot interfere with its citizens' right to profess beliefs or non-beliefs. It also establishes that citizens are free to practice religion and/or sect of their choice, without any interference from the government.

National Secular Society and Humanists UK

There are organizations that work against such distinct religious characteristics of the UK constitution and educational framework as discussed above. Among them, the most prominent are National Secular Society and Humanists UK. National Secular Society (NSS) campaigns for disestablishment of Church of England and abolition of compulsory religious education in schools. They are closely associated with the atheist groups and struggle for absolute separation of religion from the state (https://religion.fandom.com/wiki/National_Secular_Society). They attempt to influence the public minds and opinion. However, majority of the public opinion still subscribe to the constitutional-monarchical-religious framework of the UK though with certain minority thinking otherwise.

If their objectives are achieved such as 'Disestablishment of Church of England' then it will mean that the British monarch will no longer be Supreme Governor of Church of England nor will he be entitled to appoint one hundred eleven Bishops in England nor will he be crowned by the archbishop of Canterbury on his coronation. Furthermore, he will not take an oath to defend the faith and the Established Church of England as well as the Established Church Scotland nor will he appoint a Lord High Commissioner, a Scottish figure, to represent him personally in the Assembly of the Church of Scotland in its annual meetings. Similarly, the monarch will no longer be required to be protestant.

Furthermore, the Lords Spiritual will be disentitled from their memberships in the House of Lords who are altogether twenty-six in number. Similarly, chaplains' services (There are Muslim as well as other religious chaplains in the British Royal Army) in the British forces, for spiritual support, orientation as

well as overall well-being of the military personnel, will be abolished. In addition, multi-faith religious teams working in prisons across England and Wales for spiritual well-being of the prisoners, from diverse religious backgrounds, will be no longer and so on.

As of now the National Secular Society could not gain a considerable public support as the people of England still have historical and emotional attachment with the monarch being religious and secular head at the same time. An 'overall support' for the monarch was recorded statistically as 51% in 2024 (British Social Attitudes (BSA) conducted this survey in 2024), though this being the lowest record since 1983 when the data collection was first made on the subject. Whereas, in poll for 'Monarchy vs Republic' the recorded number was 58% who voted for monarchy over republic/an elected head of the state. That being said, it may be noted that the support for monarchy does not mean a direct support for the religion, since the monarchy in the United Kingdom encapsulates much wider authority, and the support of general public for the monarchs is for other reasons also.

Similarly, Humanism UK is another organization working on promoting non-religious people to develop a secular state. However, it focuses and plays major role in charity projects for human development (<https://humanists.uk/about/>).

Conclusion

Islamic Republic of Pakistan, which derives its constitutional and legal source from her colonial master, the United Kingdom, stands significantly devoid of the features found in her parental State's constitutional and legal settings. More importantly, there is a constantly held belief in Pakistan, that the constitutional foundations of United Kingdom are manifestly secular. However, the foregoing detailed analysis of the British constitutional historical evolution reveals how the religious institutions and the state institutions merged under single constitutional head who still plays a significant religious role in the British constitutional framework from monarchy to House of Lords and two established churches in addition to the legal framework for religious educational institutions, armed forces, prisons and health organizations.

A question arises as to why Pakistan's constitutional framework, which has its theoretical and ideological basis in English legal system, does not accommodate its head of the state to assume a religious role similar to that of the UK monarch as the latter assumes both secular and religious roles being the Supreme Governor of the Church of England and King of the United Kingdom, i.e. head of the state. This is despite the fact that state-religion of Pakistan is Islam and its overwhelming majority is Muslims. On the contrary, in the constitution of Pakistan, the President who substitutes the king in the UK with all similar and ceremonial functions does not hold this particular religious feature, despite being constitutionally required to be a Muslim to become head of the Islamic State. Perhaps the answer lies in the fact that Pakistan is a democratic republic, while the United Kingdom is a constitutional monarchy, and according to the constitution of Pakistan as well as being the very basic of Islam, sovereignty/supremacy belongs to Allah alone. Moreover, the preamble of the Constitution of Pakistan 1973 provides that the 'authority' to be exercised by the representatives of the people is a "sacred trust". It further provides that, "principles of democracy, freedom, equality, tolerance, and social justice, as enunciated by Islam, shall be fully observed". Thus, this further goes on to establish the point made herein.

Similarly, state funded faith-based schools run across England and Wales and constitute one-third of the entire state schools operating across the region. In England, around 37% of all the government primary schools and 19% of all the government secondary schools are faith-based school according to a data released in 2017 (<https://humanists.uk/campaigns/schools-and-education/faith-schools/>). On the contrary, the state funded schooling system in Pakistan does not operate on similar parameters. Even though Islamic education is mandatory for all school going children, religious seminaries are not purely state funded.

Similarly, all the UK prisons enjoy a robust multi-faith chaplaincy system (faith-based teams) to nurture faith among the prisoners so as to groom them for rehabilitation and reintegration in the society through faith-based behavioral orientations. The faith-based programs aim at spiritual and overall well-being of the prisoners to become capable of being civilized citizen of the country. On the other hand,

Pakistan lacks such a nuanced faith-based system in prisons. Focus is more on punitive measures than on the comprehensive well-being and rehabilitation of the prisoners.

In addition, there is a general impression in the Pakistani State and society that the United Kingdom is constitutionally a secular country which has little to do or nothing to do with religion. However, the above detailed analysis of the British constitutional framework reveals that there is substantial involvement of religion in the UK in state institutional levels, such as the Crown, Parliament, General Synod (Church Parliament), military, education and other institutions including public health sector. However, this is also to be acknowledged that there is a freedom of religion in the UK yet simultaneously there is also institutional representation of religion.

Furthermore, it is interesting to note that a similar system of constitutional integration of the religion and the state under a single ceremonial head can be witnessed in the Kingdom of Saudi Arabia where the King is also a custodian of the Two Holy Mosques (*Masjid al-Haram* and *Masjid al-Nabi*), called in Arabic '*Khadim-ul-Haramain*' which is a historical constitutional position first assumed by the great conqueror *Salahuddin Ayubi* in twelfth century followed by the Ottoman Emperor, Sultan Salim I who was the first to assume this title in the Ottoman dynasty in 1517.

Therefore, Pakistan, if it refers back to its colonial master to copy a "State System" it finds a lesson of the constitutional nexus between the state and religion. Likewise, if it refers back to its own constitutional Muslim history it again finds the long-established precedents of such integration. And finally, if it refers back to its own Holy Scripture again it finds a greater lesson for the nexus between religion and the state under the precedent of the Holy Prophet (Peace be Upon him) as he was the Head of the State of Medina and subsequently of all Arabian Peninsula simultaneously being the Prophet of Islam, a unique feature whereupon the famous historian Michael H. Hart ranked the Prophet of Islam 1st in his book, "*The 100: A Ranking of the Most Influential Persons in History*" for the reason that Prophet's supreme success combined both spiritual and temporal domains. Needless to say, that Pakistan is an Islamic Republic, and its constitution and laws adequately reflect its unique historical origins and religious inclinations of its people.

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Appendix

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