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ESTABLISHING A PATRON OF A LOCAL GOVERNMENT UNIT IN POLAND IN LIGHT OF THE PRINCIPLE OF EQUALITY BEFORE THE LAW AND THE PRINCIPLE OF EQUALITY OF CHURCHES AND OTHER RELIGIOUS ASSOCIATIONS

Abstract. The subject of the article is the analysis of the legal basis and practice of establishing patrons of local government units in Poland. The text presents the importance of the principle of equality before the law and the equality of churches and religious associations as a guarantee of pluralism of worldview. The presented proposals for changes in the law take into account the normative content of the above principles.

Keywords: patron, local government, principle of equality, churches, religious associations.

1. General remarks

In the activities of municipalities, districts and voivodeships in Poland, one can see the efforts made to establish a patron of the local government community. Analyzing this phenomenon, it should be noted that it is not easy to even make a determination of who the patron of the community is at all and what its function is in modern public life. The Constitution of the Republic of Poland of April 2, 1997 (Journal of Laws of 1997, No. 78, item 483, as amended, hereinafter: Constitution) and acts of a lower order in no way explicitly regulate the establishment of patrons. In the past, the main purpose of choosing a patron in the European countries was for the

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population to seek protection when faced with the experience of a plague or other misfortune (Mark 2020). This was combined with the particularly high importance of religion in public life and the connection of the Polish state with the Roman Catholic Church. The presence of patron saints in local and regional traditions in the Polish lands is therefore deeply rooted. At the same time, it should be noted that currently the patronage in the public space of local communities is changing its functions and meaning, because in addition to the sacred function, the function of promoting the local community is becoming more and more pronounced. This is related to the development of new forms of spirituality, the detachment of beliefs from traditional ecclesiological approaches, as well as the politicization of the institution of patronage (see e.g., Bartnicki 2025; Kasińska 2025).

In the most general terms, one can point to the occurrence of four ways of establishing a patron of a local government community in Polish administrative practice. Adoption of a resolution on the selection of a patron (I way), determination of the patron in the statute of the local government unit (II way), any mention of the established patron in other resolutions, such as those concerning the construction of a monument commemorating the patron (III way), appearance of the patron in the coat of arms of the local government unit (IV way) (Maroń 2021: 30).

The aim of the article is to reflect on the administrative practice of establishing a patron of a self-governing community in the light of Articles 25 and 32 of the Constitution. Legal conditions resulting from these constitutional provisions for potential detailed regulation in legislation have been indicated. The perspective of these principles will also be referred to the determination of a catalog of good practices recommended for use in the resolution procedure for the establishment of a patron. This seems particularly desirable in view of the currently limited scope of regulation of the establishment of patrons. Undertaking such a reflection seems reasonable, given the demands made in the doctrine to regulate the issue of establishing patrons, mainly in order to eliminate the controversy over the legal basis for resolutions on patronage (see e.g., Leszczyński 2019; Ożóg 2024: 202). The decision to regulate this matter in detail or to express a direct legal prohibition on establishing patrons of self-government communities should take into account the normative content resulting from the constitutional norms in question.

Of course, the aforementioned constitutional principles can also be applied to other forms of establishing a patron, but it was decided to narrow the scope of analysis to the form that seems to be the most controversial. The cases of determining a patron in a statute are also much less frequent.

In the form of a resolution (I way), by far the most common patrons of Polish local government units are established saints and blessed persons of the Catholic Church (see Maroń 2021). This seems to be mainly due to tradition. However, it should be borne in mind that there should be no legal obstacles to the patronage of a municipality, district, province being a person from another religious community, a non-believer, an agnostic, a clergyman or a lay person (Ożóg 2017: 49). Already at this point, it should be pointed out that this follows from the principle of equality before the law (Article 32 of the Constitution) in conjunction with the protection of freedom of conscience and religion (Article 53 of the Constitution) and the principle of equality of churches and other religious associations (Article 25(1) of the Constitution), which will be discussed in more detail.

The starting point of the research remains the statement that the above-mentioned legal norms should provide a legal guarantee for all legal entities concerned, including minority religious communities in ensuring the possibility of establishing a patron of the local government community they co-create. Considerations are focused on the reference of the principle of equality and equality of churches and other religious associations in the perspective of establishing patrons of local government communities. The adopted research perspective will make it possible not only to assess the current state of the law, the adopted administrative practice, but also to formulate appropriate conclusions *de lege ferenda*.

2. The principle of equality before the law and the establishment of a patron of a local government unit

According to Article 32(1) of the Constitution, "All are equal before the law. Everyone has the right to equal treatment by public authorities". From the principle expressed, the main implication is that two or more entities distinguished by a certain relevant characteristic are to be subject to identical treatment (Sadurski 1978: 52). Equality does not mean that everyone is to be treated the same, it does not represent extreme egalitarianism. It is worth bearing in mind that the principle of equality, with certain exceptions, is not applied independently, in the sense that each time it must be linked to a particular constitutional right or freedom (decision of the Constitutional Court of 24.10.2001, ref. SK 10/01, OTK 2001, No. 7, item 225). Undoubtedly, the principle from Article 32 of the Constitution can be referred to the legal norms concerning the establishment of a patron of a local government unit, given that in this type of public

administration matters, there is the realization of freedom of conscience and religion (Article 53 of the Constitution), as well as freedom of belief (Article 54 of the Constitution) of the subject requesting the establishment of a patron. Usually, applying for a resolution to establish a given person as the patron of a self-governing community is an expression of the applicant's support for certain values that the given person has embodied. In this sense, it can be considered that such behavior manifests the freedom of Article 53 of the Constitution or Article 54 of the Constitution. The diversity of definitions of religion and, in the face of new forms of spirituality, the issue of the legal qualification of ideologically motivated behaviours may lead to a blurring of the differences between freedom of conscience and religion and freedom of belief. From a practical point of view, in every case of applying for the establishment of a patron of a self-governing community, there is a phenomenon of expressing beliefs in public life, which is expressly recognized as permissible in Article 25, paragraph 2 in fine of the Constitution. This provision is placed in Chapter I of the Constitution, which emphasizes its rank and has a special meaning in the relationship between an individual and public authorities (Ożóg 2015). The possibility of submitting an application to establish a patron of a self-governing community with respect for the principle of equality before the law will also mean the implementation of respect for the right of everyone to express religious, ideological and philosophical beliefs in public life.

In this context, the legal norms indicated in the legal basis for establishing patronage of local government units and other legal norms applied in the resolution procedure are subject to evaluation from the point of view of the benchmark contained in Article 32 of the Constitution.

Referring in detail to the principle of Article 32 of the Constitution to matters of establishing patrons, it is first necessary to make general findings as to whether the legal provisions governing the establishment of patrons of local communities may possibly differentiate the status of applicants and participants in the proceedings. This is because it should be remembered that the principle of equality before the law is not an absolute principle. The essence of the above question boils down to determining whether there may be grounds for differentiating the subjective scope and content of the rights of subjects in the area of establishing a patron of a local government unit. In doing so, each case of deviation from the principle of equality requires the indication of appropriate constitutional reasoning (Borysiak and Bosek 2016: 840). First of all, it is necessary to briefly present the current legal provisions on the establishment of patrons of local government units

by a separate resolution, and then assess whether a possible deviation from the principle of equality could be justified by the protection of constitutional values.

It should be noted that there are no legal provisions explicitly providing for the authority to choose a patron for a local government community. There is no such provision of substantive law. This is because usually the resolutions on the selection of a particular patron indicate the general provisions from the so-called local government statutes on the implementation of promotional tasks from the so-called local government statutes. These are, respectively: article 7 paragraph 1 item 18 of the Act of March 8, 1990 on municipal self-government (Consolidated Text 2024 item 1465), article 4 paragraph 1 item 21 of the Act of June 5, 1998 on county self-government (Consolidated Text 2024 item 107), article 11 paragraph 1 item 1 of the Act of June 5, 1998 on province self-government (Consolidated Text 2025 item 581). With regard to the municipality, an additional reference is made to the general provision of Article 18 of the municipal government Act, referred to as the so-called presumption of competence in favor of the municipality. However, none of the above-mentioned legal provisions explicitly constitute the competence to establish a patron, so the recognition of the permissibility of this practice was derived from the normative content of the legal provisions in question. The main objection to the issuance of resolutions on the choice of a patron of a local community concerns the violation by such a resolution of Article 7 of the Constitution of the Republic of Poland of April 2, 1997. Already in the supervisory decision of the Lower Silesian Voivode of 2010, a flagrant violation of Article 7 of the Constitution was found by issuing a resolution of the Council of the Municipality of Duszniki Zdrój on the establishment of St. Peter as patron of the municipality, recognizing that the issuance of this act had no legal basis (Supervisory decision of the Lower Silesian Voivode, NK.II.AL4.0911-5/10), http://www.bip.umdusznikizdroj.dolnyslask.pl/dokument,iddok,527,idmp,5).

In the basis of the law adopted that this type of decision on patronage constitutes the basis for the application by persons who apply, in the principles arising from the state with communities for a good man and a good connection, in accordance with art. 25 sec. 3 of the Constitution of physiology, the fact that confessional legal entities also participate in the resolution-making procedure (Świderski 2022: 47). The dispute, therefore, concerns the determination of whether, in order to issue a resolution on the election of a patron is necessary a legal provision *expressis verbis* conferring the power to adopt such a normative act, or whether it is possible to derive such a norm from existing legal provisions through interpretation of the legal text.

Without going into the dispute about the legal basis for patronage resolutions, it is possible to share the position that if such resolutions do not impose obligations on the addressees, it is possible to pass them. In court-administrative jurisprudence, as an aside, in the context of consideration of complaints under Article 101 of the Act of March 8, 1990 on municipal self-government (Consolidated Text 2024 item 1465), it has been recognized that such resolutions fall within the implementation of tasks of municipal promotion (Judgment of the Provincial Administrative Court in Warsaw dated November 26, 2014, ref. no. IV SA/Wa 1391/14, Lex no. Lex nr 1758852; Judgment of the Provincial Administrative Court in Gorzow Wielkopolski dated June, 30, 2011 (ref. no. II SA/Go 83/11, Lex no. 1613717).

It is therefore necessary to refer to the linguistic and customary understanding of patronage. These findings are relevant to the title considerations. Thus, according to the definition of the Polish language dictionary, "patron" means (term "patron in polish language", https://sjp.pl/patron):

1. "a distinguished and usually deceased person whose name is given to an institution or some place";
2. "a holy person or tutelary deity to whom some country, object, person or group is given for protection";
3. "a saint whose name is given at baptism";
4. "a person or institution caring for someone or something".

Taking into account the circumstance of the absence of provisions directly indicating the entities entitled to apply for the establishment of a patron, it should be considered that there are no grounds for differentiating the scope of entities entitled to apply for the establishment of a patron of a municipality, county, voivodeship in the decisions of the bodies of local government units. Any individual should remain entitled to apply for the establishment of a patron of a municipality, district, or province. The key should be only the fact of residing in the territory, and thus having the status of a member of the local government community, which, according to Article 15 of the Constitution, is acquired by operation of law. It is unacceptable to introduce criteria in state and local laws that narrow this entitlement to persons distinguished on the basis of religion, citizenship, sexual orientation, political and other beliefs. It is worth noting that an application for the establishment of a patron of a local government unit can be submitted by a person with a theistic worldview, as well as an atheistic one. There is no obstacle for a foreigner to submit an application for the establishment of a patron as well. The principle of equality also applies to non-citizens, as already stated by the Constitutional Tribunal in its judgment of Febru-

ary 24, 1999 (Judgment of the Constitutional Tribunal ref. SK 4/98, OTK 1999, No. 2, item 24).

Thus, it should also be borne in mind that the source of everyone's constitutional rights and freedoms remains human dignity according to Article 30 of the Constitution (see more e.g. Lewaszkiewicz-Petrykowska 1998). Freedom of conscience and religion and freedom of belief are enjoyed by everyone, so denying a foreigner the opportunity to apply for a patron would be a flagrant violation of the above constitutional provisions. The prerequisites for triggering the resolution procedure for the selection of a patron should be of a general nature provided for in the statute. There is no legal basis for differentiating the procedure for the establishment of a patron from other proceedings.

Nor does it seem justified to limit the right to file a request for the establishment of a patron based on any other differentiating criteria. First of all, it should be mentioned that, from the point of view of Polish law, the religion of the subject requesting the establishment of a particular patron is irrelevant, so it is possible for a person to request the selection of a patron with a religion other than the applicant's worldview. From the point of view of the norm of Article 53(7) of the Constitution, it is forbidden for local government bodies to ask questions about worldview or religion when applying for the establishment of a patron (Ożóg 2021). In a state with the accepted separation of the state and religious communities, the question of worldview remains legally irrelevant.

It is impermissible to restrict the right to nominate a candidate for patronage to selected categories of people, such as those associated only with a particular religious community. It would be a constitutional violation to restrict patronage candidates to people who meet a set profile within a particular religious community. In other words, public authorities may not evaluate attitudes occurring within the teachings of a particular religious community, as this would be inconsistent with the principle of worldview impartiality of public authorities from Article 25(2) of the Constitution. It is also impermissible to restrict the right to request the establishment of a patron to selected religious communities in acts of internal management, such as instructions, circular letters, guidelines, or regulations.

It is also particularly important that local laws do not differentiate the prerequisites for triggering the procedure for the establishment of a patron saint on the basis of a worldview option (Ożóg 2025: 49–50). It would be a violation of the principle of equality under Article 25(1) of the Constitution to adopt a differentiated minimum number of people to initiate the resolution procedure for different religions, to apply different deadlines for

processing applications. It would also be a violation of the principle of equality to refuse to establish a patron from a particular religious community because of the choice of a patron already made in the past. For example, adopting the maximum number of established patrons would not justify restricting the right to request the establishment of a patron. Adopting numerical criteria in the implementation of human rights should be considered unacceptable.

The question of the status of the religious community to which the applicant belongs is irrelevant to the possibility of requesting the selection of a patron. On a free basis, it is possible to request a patron by members of churches and religious associations with a regulated legal situation, as well as an unregulated legal situation. Individual entitlement does not depend on the degree of formalization and institutionalization of the religious community in question. More extensively about the above issue will be in the part of the article on the impact of the principle of equality of churches and other religious associations in the area of establishing patrons of local government units.

Constitutional rights and freedoms refer to living persons, hence it is not possible to speak of their application directly to candidates for patrons, who are usually non-living persons, but it seems that the principle from Article 32 of the Constitution should also apply to the dimension of promoting persons in public space in accordance with equality. This is particularly important given the not uncommon political and worldview disputes over the choice of a patron. Providing an equal opportunity to nominate candidates with different worldviews seems fundamental to the subsequent acceptance of the practice of establishing patrons. Providing an equal opportunity to nominate candidates with different worldviews seems fundamental to the subsequent acceptance of the practice of establishing patrons. Moreover, the creation of equal opportunities for the selection of patrons with different worldviews remains consistent with the worldview impartiality of public authorities from Article 25(2) of the Constitution. It is impermissible to exclude a priori candidates for patrons on the basis of their worldview. However, the freedom of choice of candidates for a patron is not absolute, as it would be unacceptable to establish as a patron a person representing nazism, fascism, communism. This is already a result of the axiology of the Polish political system, as Article 13 of the Constitution explicitly qualified this type of doctrine as inadmissible within the functioning of political parties. Therefore, such candidacies should be rejected, taking into account the need to preserve the axiological consistency of the legal order.

It is worth bearing in mind that the norm of Article 32 of the Constitution does not provide a claim for the establishment of a preferred patron in accordance with the application submitted. Equality before the law should be understood as an order to create equal opportunities in the possibility of submitting an application for the establishment of a patron of a given municipality, district, province. The decision on the selection of a given candidacy is made by the decision-making bodies of local government units based on the institution of voting, in accordance with the majority rule. In the event of failure to obtain adequate support for a given candidacy in a vote that met all the formal and substantive requirements, no allegation of unequal treatment can be raised. In this regard, it is important to emphasize the great importance of those who make up the collegiate body, considering complex resolution initiatives, to maintain professionalism and objectivity, respecting the principle of worldview impartiality of public authorities and non-discrimination.

3. The principle of equality of churches and other religious associations and the establishment of a patron of a local government unit

The principle of equality of churches and other religious associations is an exemplification of the principle of equality in Article 32 of the Constitution. It is noteworthy that it was indicated first within Article 25 of the Constitution, which emphasizes its special importance among the principles of relations between the Polish state and churches and other religious associations. Significantly, Article 25(1) of the Constitution indicates "equality" rather than "equality" to define the legal position of religious communities. In the literature, the view has been expressed that the legislature's use of a different expression than equality should prompt different interpretive conclusions in accordance with the presumption of rationality of the legislator (Garlicki 2007: 10). According to some, this may have been sought to eliminate the "primitive identification of equality with sameness" (Krukowski, 88). From a practical point of view, it remains important to point out that in order to assess the fulfillment of the equality requirement of Article 25 of the Constitution, it is necessary to refer to the body of jurisprudence of the Constitutional Court in the field of Article 32 of the Constitution, taking into account the constructions developed on the grounds of this legal provision (Abramowicz 2018).

As emphasized in the literature, the provision of Article 25(1) of the Constitution concerns the relationship between the Polish state and religious communities, that is, the institutional dimension (Garlicki 2007: 9). It is worth noting the evolution of this principle in the perspective of Article 114 of the Constitution of the Republic of March 17, 1921, which provided for the principle of equality of religions and the supreme position of the Catholic Church. Thus, the accent is now mainly on the institutional dimension, but there is no doubt that equality and equal rights should be protected under the Constitution refers to both the individual and institutional aspects of freedom of conscience and religion.

It follows from the principle of equal rights of churches and religious associations that no religious community can gain a privileged position in the Polish state (Winczorek 2008: 65), so legislation should be shaped in such a way that the differentiation of the legal situation of individual religious subjects always has adequate justification. There is no official religion in the Republic of Poland (Skrzydło 2009: 37). Thus, from the norm of Article 25(1) of the Constitution, one can derive a conclusion about the prohibition of legal regulations allowing only selected churches and religious associations to submit an application for the establishment of a patron of a local government unit. This would lead to the appropriation of public space by a particular confessional denomination, which would also strike at the principle of worldview impartiality of public authorities. In the current state of the law, the legislation does not address the status of churches and religious associations in the sphere of proceedings concerning the establishment of a patron of the local community.

The equal rights of each religious community to establish a patron of a local government community means the ability to request the selection of a patron of a local government unit at the initiative of a religious community. The ability to request the establishment of a patron will be provided for religious communities with a legally relevant feature. The key issue is to answer the question of whether the issue of determining the legal position of a religious community affects the scope of authority in the sphere of establishing a patron of a local government unit?

First, it is necessary to present the legal terminology used to designate religious communities in Polish law. In the Constitution and in Polish legislation there is a formula "churches and other religious associations" to designate religious communities, which take different names. Observing the relationship of the terms "religious association" and "church" leads to the conclusion that a church is a type of religious association distinguished from other religious associations only by name, not constituting a separate legal

category (Cupriak 2014: 588). From the point of view of logical division, the formula of religious association is broader in scope. In legal terms, a religious association is "a religious community established for the purpose of professing and spreading religious faith."

Freedom of conscience and religion of institutionalized entities, which are referred to as "churches and other religious associations" in the Polish legal system, does not derive *expressis verbis* from the Constitution. The Constitutional Court, even before the enactment of the Constitution, recognized that the provisions of the protection of the rights and freedoms of citizens have in mind not only natural persons, but also legal entities that unite their activities, such as: cooperatives, companies, associations, as well as churches and other religious associations, when they implement the rights and freedoms of individuals to meet their needs (see the resolution of the Constitutional Tribunal of 24 June 1992, ref. no. W 11/91, LEX No. 25348). Polish constitutional jurisprudence has developed freedom of religion in the institutional dimension, which did not follow directly from the norms of the Basic Law at the time.

Thus, within the framework of the realization of freedom of religion, it is fully permissible for a group with a religious profile to function only as a collective, an association of a sociological nature. The Constitutional Court accepts that "freedom of religion is included in the constitutional norm very broadly, encompassing all religions and membership in all religious associations, and therefore it is not limited to participation in religious communities that form a formal, separate organizational structure and registered in the relevant registers kept by the public authority".

Nevertheless, from the fact that the legal status of a religious community is regulated, there are a number of rights provided only for such groups. This is the case, for example, with the permissibility of organizing religious lessons in a public school (Article 53(4) of the Constitution), taking part in charitable and social activities of a church, religious association in penitentiaries and detention centers (Article 106 § 2 in conjunction with Article 242 § 12 of the Law of June 6, 1997, Executive Penal Code, Consolidated Text Journal of Laws 2024 item 706). In turn, in light of Article 1 § 3 of the Act of February 25, 1964. – Family and Guardianship Code (Consolidated text 2023 item 2809), the simultaneous conclusion of a marriage governed by Polish law at the time of the declaration of intent before a clergyman is permissible if a ratified international agreement or a law regulating relations between the state and a church or other religious association provides for the possibility for a marriage governed by the internal law of that church or other religious association to produce such effects as are

produced by the conclusion of a marriage before the head of a civil registry office. In the Polish legal system, the legal position of a religious community may be regulated by an international agreement, a law or an administrative decision.

From the perspective of Article 25(1) of the Constitution, it is important that churches and religious associations have a legally significant feature not to be treated differently. In Polish law, religious communities with a formed legal status can be divided into two groups. The first includes those that have a formed legal status by an international agreement, a law, a decree of the President of the Republic. The second group includes religious communities listed in the register of churches and other religious associations. The absence of a provision authorizing the filing of an application for the establishment of a patron of a local community makes it possible to adopt the view that any religious community is allowed to file such an application, and its legal status remains irrelevant. At the same time, it should not be forgotten that every community is made up of people, which is why it is so important to respect the individual freedom of those requesting the establishment of a patron. Indeed, the equality of rights under Article 25(1) of the Constitution is closely linked to the externalization of the freedom of conscience and religion of those involved (Boć 1999: 62).

Taking into account the above findings, it seems that any religious community has the right to file an application for the establishment of a patron of a local government unit, which is already supported by the framework of freedom of conscience and religion of the people who make up the religious community. *De lega lata*, the legal provision does not explicitly define the status of religious communities in the sphere of establishing a patron of a local government unit, so there is no requirement for a religious community seeking to file an application for the establishment of a patron of a local government community to have a regulated legal status.

It is worth considering whether the introduction of such a condition would be justified by the protection of certain constitutional values. There seems to be no basis for differentiating the status of religious communities on the establishment of a patron of a local government unit. The premise of regulated legal status does not seem relevant in this regard. In the case at hand, the participation of religious communities can amount to requesting the establishment of a patron, as well as participation in a case already pending. The lack of differentiation in the scope of authority is also due to the fact that the key is the evaluation of the proposed candidate for a patron, his connection to the local government community, and the formal status of the religious community does not seem to be relevant. Indeed, it should

be emphasized that regulating the legal status of a religious community is a power, not an obligation (Olszówka 2016: 660).

Even assuming the adoption of the admissibility of requesting the establishment of a patron only by churches and religious associations with a regulated legal situation, we would have a potentially possible situation of circumvention of the law, through the submission of requests by individuals or other structures, such as associations. For these reasons, the adoption of the criterion of formal regulation of the legal status of a religious community in the establishment of a patron should be rejected, recognizing that any church and religious association, including those existing only de facto, can apply for the establishment of a patron.

Possible changes in state law in the direction of allowing explicitly the possibility of establishing a patron of a local government unit could be combined with changes in the area of religious law. The literature on the subject postulated the addition of appropriate legal regulation in individual laws shaping the legal position of individual religious communities in the Polish state (Ożóg 2019). However, when deciding on such a legislative technique, it would also be necessary to ensure consistency so that appropriate legal provisions are included in each law. It would then also be necessary to add a corresponding legal provision in the Law of May 17, 1989 on Guarantees of Freedom of Conscience and Religion. This is because the regulations from this act are of particular importance for religious communities listed in the register of churches and other religious associations, and there are more than 95% of them in the group of those with a certain legal position.

On the other hand, if the proposed amendment to the law on the prohibition of the establishment of patrons is adopted, it would then have to be assumed consistently that no religious community can request the establishment of a patron (Leszczynski 2019). One could imagine attempts to argue in favor of preserving this right for religious communities with the greatest influence on the history of local and regional communities, but such interpretive efforts would be difficult to defend and would generate public controversy.

Conclusions

The practice of establishing patrons of local government units finds its support in the freedom of conscience and religion and the freedom of beliefs of members of the local government community, who have the right to expect and request that a preferred person become a patron of the municipality,

county, province. Equality of rights derives primarily from human dignity, which is the source of human rights in Polish law. The initiative in this regard can come from any church and religious association. The current legal provisions indicated as the basis for patronage resolutions largely have the valence of task norms, so that they do not apply to strictly profiled legal subjects. Their content can be taken into account for all those interested in choosing a patron. In this sense, these provisions can be considered to meet the standard from the provisions of Article 25(1) of the Constitution and Article 32 of the Constitution. The current legal provisions indicated as the basis for patronage resolutions largely have the valence of task norms, so that they do not apply to strictly profiled legal subjects. Their content can be taken into account for all those interested in choosing a patron. In this sense, these provisions can be considered to meet the standard from the provisions of Article 25(1) of the Constitution and Article 32 of the Constitution. Efforts should be made to create space for minority religious communities to request the establishment of a patron saint. It is particularly important to strive to preserve equal opportunities for the establishment of a patron for all members of the local government community. Identical rights for all religious associations should be pursued.

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