

In 2019, Pakistan made a moderate advancement in efforts to eliminate the worst forms of child labor. Punjab Province adopted the Punjab Domestic Workers Act of 2019, which prohibits children under age 15 from working in any domestic service capacity. The Pakistan National Assembly also passed the Islamabad Capital Territory Prohibition of Employment of Children Act. In addition, the Islamabad Capital Territory established its Child Protection Advisory Board, and the Khyber Pakhtunkhwa and Balochistan provincial labor departments earmarked specific funds from their budgets to conduct child labor surveys. Khyber Pakhtunkhwa Province also established a dedicated child labor unit. Children in Pakistan are engaged in the worst forms of child labor, including in commercial sexual exploitation and domestic work, each sometimes as a result of human trafficking. Children also engage in forced labor in brick kilns and agriculture. The federal government and Balochistan Province have not established a minimum age for work or hazardous work in compliance with international standards. In addition, provincial labor inspectorates do not receive sufficient resources to adequately enforce laws prohibiting child labor, and the federal and provincial governments failed to publish data on their efforts to enforce criminal or labor laws related to child labor. Further, police corruption, particularly the taking of bribes from suspected perpetrators to ignore child labor crimes and lack of willingness to conduct investigations, hindered Pakistan's ability to address the problem throughout the country.



I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Pakistan are engaged in the worst forms of child labor, including in commercial sexual exploitation and domestic work, each sometimes as a result of human trafficking. Children also engage in forced labor in brick kilns and agriculture. (I-4) Table I provides key indicators on children's work and education in Pakistan. Data on some of these indicators are not available from the sources used in this report.

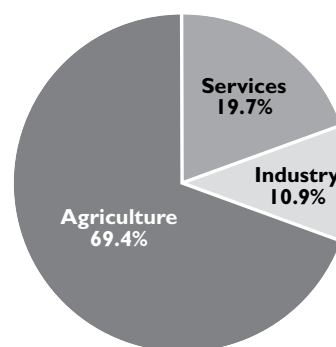
Table I. Statistics on Children's Work and Education

Children	Related Entity	Age	Percent
Working (% and population)	All Pakistan	10 to 14	9.8 (2,261,704)
	Punjab Province	5 to 14	12.4
	Sindh Province	5 to 14	21.5
Attending School (%)	All Pakistan	10 to 14	78.0
	Punjab Province	5 to 14	77.1
	Sindh Province	5 to 14	60.6
Combining Work and School (%)	All Pakistan	10 to 14	0.8
	Punjab Province	7 to 14	8.2
	Sindh Province	7 to 14	11.6
Primary Completion Rate (%)	All Pakistan		71.1
	Punjab Province		Unavailable
	Sindh Province		Unavailable

Source for primary completion rate: Data from 2018, published by the UNESCO Institute for Statistics, 2020. (5)

Source for all other data: International Labor Organization's analysis of statistics from Labour Force Study (LFS), 2017–2018; and Multiple Indicator Cluster Survey 5 (MICS 5), 2014. (6)

Figure I. Working Children by Sector, Ages 10-14



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Based on a review of available information, Table 2 provides an overview of children’s work by sector and activity.

Table 2. Overview of Children’s Work by Sector and Activity

Sector/Industry	Activity
Agriculture	Farming, including harvesting cotton, wheat, and sugarcane (3,7-11)
	Fishing, including deep sea fishing (12,13)
Industry	Manufacturing glass bangles,† surgical instruments,† and jewelry (3,4,10,12,14-19)
	Weaving carpets,† producing garments, and tanning leather,† (3,12,17,19-22)
	Producing bricks (1,3,4,19,21-26)
	Mining coal† and gemstones, and crushing stone† (12,21,24,27,28)
Services	Domestic work (2,4,29-31)
	Working in hotels, restaurants, gas stations, and automobile repair (3,4,8,21,32-35)
	Scavenging† and sorting garbage and recyclables, begging, and street vending (3,7,32,36-38)
Categorical Worst Forms of Child Labor‡	Forced labor in agriculture, brickmaking, carpet weaving, and coal mining (1,3,39-41)
	Forced domestic work, sometimes as a result of human trafficking (2,3,29,41)
	Commercial sexual exploitation, including use in the production of pornography, sometimes as a result of human trafficking (3,4,19,41-45)
	Forced begging, sometimes as a result of human trafficking (3,8,41)
	Forced recruitment of children by non-state armed groups for use in armed conflict (41)
	Use in illicit activities, including trafficking and producing drugs (3,38)

† Determined by national law or regulation as hazardous and, as such, relevant to Article 3(d) of ILO C. 182.

‡ Child labor understood as the worst forms of child labor *per se* under Article 3(a)–(c) of ILO C. 182.

Pakistan consists of the Islamabad Capital Territory (ICT), which is governed by federal law, as well as four provinces—Balochistan, Khyber Pakhtunkhwa, Punjab, and Sindh—each of which is responsible for all social services, including those related to labor, within their areas. Law enforcement responsibilities are shared between the federal and provincial governments. (46) When available, data and information are included for the federal and provincial governments in this report. In 2019, Pakistan’s federal and provincial governments, with technical assistance provided by UNICEF, continued conducting nationwide child labor surveys. These surveys—the first conducted since 1996—are expected to address the lack of available child labor data that has hampered the federal and provincial governments’ ability to accurately assess the scope and prevalence of child labor. (3,29)

Many child domestic workers work under conditions of forced labor, including debt bondage, sexual assault, and extreme physical abuse. (2,3,29,31) Indeed, reports estimate that 70 percent of bonded laborers in Pakistan are children. (46,47) Poor rural families sometimes sold their children into domestic servitude or other types of work, or paid agents to arrange for such work, often believing their child would work under decent conditions. Children were also kidnapped or sold into organized begging rings, domestic servitude, gangs, and child sex trafficking. (46,48) Some children work with their families as bonded laborers in the production of bricks. (3,4,8,26,41,49)

Begging ringmasters sometimes maim children to earn more money and sometimes force children to steal, and organized criminal groups force children into drug trafficking in Sindh and Balochistan. Research found that due to the consistent lack of law enforcement efforts against those who exploited street children, including in forced labor and sex trafficking, traffickers operated openly and with impunity. (3,46,50)




Child laborers in Pakistan, particularly boys, are frequently subjected to sexual exploitation at their places of employment, including in factories, workshops, mines, or while scavenging on the streets. (51) They are also sometimes subjected to sexual exploitation in order to obtain or keep a job or for accommodations. Research indicates that in Kasur, a city in the Punjab Province where sexual exploitation of children is considered to be among the highest in the country, 90 percent of working children under age 14 have been sexually harassed or exploited. (3,41,52,51) The practice of *bacha bazi*, or boy play, in which boys are forced to provide social and sexual entertainment for older men, is common within Pakistan. Traffickers in Pakistan also promise Pakistani boys admission to Afghani religious schools only to instead sell them to Afghan security forces for the purpose of sexual exploitation. (41,53)

Children in Pakistan face several barriers to education. Of significant concern is the sexual abuse of children in Pakistan's *madrassas*—Islamic religious schools that provide free education and meals to Pakistan's poorest children. (52,54,55) There are more than 22,000 registered *madrassas* in the country, in addition to an estimated 2,000-3,000 unregistered *madrassas*; sexual abuse in *madrassas* significantly hinders the ability of a large number of Pakistani children to attend school and receive an education. (52,54) In addition, non-state armed militant groups—Tehreek-e-Taliban Pakistan, its splinter groups, and ISIL-KP—forcibly recruited and used children in terrorist activities, including suicide attacks. Further, while research found that the total number of terrorist attacks against schools have continued to decrease since 2009, schools in Pakistan may still be vulnerable to attacks by unknown armed groups, disrupting children's access to education. (3,10,19,46,56-61) Many other children face barriers to accessing education including high rates of teacher absenteeism, inadequate facilities, lack of transportation, school fees, and corporal punishment, which may deter children from attending school. (3,10,57,60,62-64) Lastly, while children are not legally required to have a birth certificate to enroll in public or private school, research indicates that some private schools may still require children's birth certificate in order to enroll. (3,46) Research also found only 31 percent of births are officially registered. Children without a birth certificate who cannot enroll in school are at much higher risk of becoming victims of exploitative labor conditions. (65)

II. LEGAL FRAMEWORK FOR CHILD LABOR

Pakistan has ratified most key international conventions concerning child labor (Table 3).

Table 3. Ratification of International Conventions on Child Labor

Convention	Ratification
 ILO C. 138, Minimum Age	✓
ILO C. 182, Worst Forms of Child Labor	✓
 UN CRC	✓
UN CRC Optional Protocol on Armed Conflict	✓
UN CRC Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography	✓
 Palermo Protocol on Trafficking in Persons	

The government has established laws and regulations related to child labor (Table 4). However, gaps exist in Pakistan's legal framework to adequately protect children from the worst forms of child labor, including the minimum age for work and for hazardous work.

Table 4. Laws and Regulations on Child Labor

Standard	Related Entity	Meets International Standards	Age	Legislation
Minimum Age for Work	Federal	No†	14	Section 50 of the Factories Act; Section 20 of the Shops and Establishments Ordinance; Section 26 of the Mines Act; Section 3 of the Road Transport Workers Ordinance (66-69)
	Balochistan	No		Section 50 of the Factories Act; Section 20 of the Shops and Establishments Ordinance; Section 26 of the Mines Act; Section 3 of the Road Transport Workers Ordinance (66-69)
	Khyber Pakhtunkhwa	No	14	Sections 2(1)(b) and 3(1) of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act; Section 21 of the Khyber Pakhtunkhwa Shops and Establishments Act; Section 49 of the Khyber Pakhtunkhwa Factories Act (70-72)

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Table 4. Laws and Regulations on Child Labor (Cont.)

Standard	Related Entity	Meets International Standards	Age	Legislation
Minimum Age for Work	Punjab	Yes†	14	Section 3(1) of the Punjab Restriction on Employment of Children Ordinance; Section 5 of the Punjab Prohibition of Child Labor at Brick Kilns Act; Section 3 of the Punjab Domestic Workers Act (73,74,154)
	Sindh	No	14	Section 3(1) of the Sindh Prohibition of Employment of Children Act; Section 81 of the Sindh Factories Act; Section 20 of the Sindh Shops and Commercial Establishment Act (75-77)
Minimum Age for Hazardous Work	Federal	No	14	Sections 2–3 of the Employment of Children Act (78)
	Balochistan	No	14	Sections 2–3 of the Employment of Children Act (78)
	Khyber Pakhtunkhwa	Yes	18	Sections 2(1)(a) and 3(2) of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (70)
	Punjab	Yes	18	Section 3(2) of the Punjab Restriction on Employment of Children Ordinance (74)
	Sindh	Yes	18	Section 3(2) of the Sindh Prohibition of Employment of Children Act (77)
Identification of Hazardous Occupations or Activities Prohibited for Children	Federal	Yes		Parts 1–2 of the Schedule of the Employment of Children Act (78)
	Balochistan	Yes		Parts 1-2 of the Schedule of the Employment of Children Act (78)
	Khyber Pakhtunkhwa	Yes		Parts 1–2 of the Schedule of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (70)
	Punjab	Yes		Schedule of Hazardous Work of the Punjab Restriction on Employment of Children Ordinance (76)
	Sindh	Yes		Schedule of Hazardous Work of the Sindh Prohibition of Employment of Children Act (77)
Prohibition of Forced Labor	Federal	Yes		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Section 4 of the Bonded Labor System (Abolition) Act; Sections 367, 370, 371A–371B, and 374 of the Penal Code (79-81)
	Balochistan	Yes		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Section 4 of the Bonded Labor System (Abolition) Act; Sections 367, 370, 371A–371B, and 374 of the Penal Code (79-81)
	Khyber Pakhtunkhwa	Yes		Sections 2(j) and 3 of the Khyber Pakhtunkhwa Bonded Labor System (Abolition) Act; Sections 367, 370, 371A–371B, and 374 of the Penal Code (80,82)
	Punjab	Yes		Section 11(3) of the Punjab Restriction on Employment of Children Ordinance; Section 4 of the Punjab Bonded Labor System (Abolition) Act (74,83)
	Sindh	Yes		Section 4 of the Sindh Bonded Labor System (Abolition) Act; Section 14.1(a) of the Sindh Prohibition of Children Act (77,84)
Prohibition of Child Trafficking	Federal	No		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A–366B of the Penal Code; Sections 2(g), 3 of the Prevention and Control of Human Trafficking Ordinance (80,81,85)
	Balochistan	No		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 369A of the Penal Code; Sections 2(g), 3 of the Prevention and Control of Human Trafficking Ordinance (80,81,85)

Table 4. Laws and Regulations on Child Labor (Cont.)

Standard	Related Entity	Meets International Standards	Age	Legislation
Prohibition of Child Trafficking	Khyber Pakhtunkhwa	No		Sections 2 and 52 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (86)
	Punjab	No		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A–366B of the Penal Code; Sections 2(g), 3 of the Prevention and Control of Human Trafficking Ordinance (80,81,85)
	Sindh	No		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A–366B of the Penal Code; Sections 2(g), 3 of the Prevention and Control of Human Trafficking Ordinance (80,81,85)
Prohibition of Commercial Sexual Exploitation of Children	Federal	No		Sections 292(B)–292(C), 366A–366B, and 371A–371B of the Penal Code; Sections 2, 3, and 7 of the Prevention of Trafficking in Persons Act; Second Amendment to the Criminal Code, Section 377A, 292B (2016) (80,81,87)
	Balochistan	No		Sections 292(B)–292(C), 366A–366B, and 371A–371B of the Penal Code; Sections 2, 3, and 7 of the Prevention of Trafficking in Persons Act; Second Amendment to the Criminal Code, Section 377A, 292B (2016) (80,81,87)
	Khyber Pakhtunkhwa	No		Sections 2, 48, and 53 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (86)
	Punjab	Yes		Section 11(3)(b) of the Punjab Restriction on Employment of Children Ordinance; Section 40 of the Punjab Destitute and Neglected Children Act (74,88)
	Sindh	Yes		Section 14.1(b) of the Prohibition of Employment of Children Act (77)
Prohibition of Using Children in Illicit Activities	Federal	No		
	Balochistan	No		
	Khyber Pakhtunkhwa	No		Sections 35, 38, and 45 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (86)
	Punjab	Yes		Section 11(3)(c) of the Punjab Restriction on Employment of Children Ordinance; Section 36 and 36A of the Punjab Destitute and Neglected Children Act (74,88)
	Sindh	Yes		Section 14.1(c) of the Prohibition of Employment of Children Act (77)
Minimum Age for Voluntary State Military Recruitment	Federal	Yes	18	Section 3 of the National Service Ordinance (89)
Prohibition of Compulsory Recruitment of Children by (State) Military	Federal	N/A*		
Prohibition of Military Recruitment by Non-state Armed Groups	Federal	No		
	Balochistan	No		
	Khyber Pakhtunkhwa	No		
	Punjab	Yes		Section 11(3)(a) of the Punjab Restriction on Employment of Children Ordinance (74)
	Sindh	Yes		Section 14.1(c) of the Sindh Prohibition of Employment of Children Act (77)
Compulsory Education Age	Federal	Yes	16	Section 3 of the Right to Free and Compulsory Education Act (90)
	Balochistan	Yes	16	Section 3 of the Balochistan Compulsory Education Act (91)
	Khyber Pakhtunkhwa	Yes	16	Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (70)

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Table 4. Laws and Regulations on Child Labor (Cont.)

Standard	Related Entity	Meets International Standards	Age	Legislation
Compulsory Education Age	Punjab	Yes	16	The Punjab Free and Compulsory Education Ordinance (92)
	Sindh	Yes	16	Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (93)
Free Public Education	Federal	Yes		Section 3 of the Right to Free and Compulsory Education Act (90)
	Balochistan	Yes		Section 2(f) of the Balochistan Compulsory Education Act (91)
	Khyber Pakhtunkhwa	Yes		Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (70)
	Punjab	Yes		The Punjab Free and Compulsory Education Act (92)
	Sindh	Yes		Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (93)

* No conscription (89)

† The minimum age for work in shops and establishments is 14 years old. The minimum age for work in factories and mines is 15 years old (66-68)

‡ The minimum age for work in brick kilns is 14 years old. The minimum age for work in domestic work is 15 years old (73,75)

The Eighteenth Amendment to the Pakistani Constitution permits provinces to pass laws that govern labor law and children's welfare. (94,153) Federal law applies only until the province passes a law on the same subject. (26,96)

In 2019, the Pakistan National Assembly passed the Islamabad Capital Territory Prohibition of Employment of Children Act, which would prohibit the employment of children age 14 and younger in any establishment, including agricultural and household establishments; would prohibit the employment of children ages 15 to 18 in hazardous work; and would establish a hazardous work list prohibited for children. However, the Senate had not approved the bill at the close of the reporting period. (3,96) The Balochistan Employment of Children (Prohibition and Regulation) Bill, which would include an updated list of hazardous work prohibited for children; prohibit hazardous work for children under 18 years of age; and establish a minimum age of 14 years of age was sent to the cabinet for consideration. (21)

Pakistan's federal and provincial laws are not completely in compliance with international standards on child labor. The federal minimum age for work provisions, as well as the minimum age for work laws in Balochistan, Khyber Pakhtunkhwa, and Sindh Provinces are not in compliance with international standards because they do not extend to informal employment, such as household work. (66-77,154)

The federal government's minimum age for hazardous work is currently 14 years old, which does not comply with international standards. (78) The federal minimum age for hazardous work still applies in Balochistan Province, as Balochistan has not established a minimum age for hazardous work. (29,78,98)

Hazardous work prohibitions for the federal government and the four provinces do not cover brickmaking, for which there is evidence that children are exposed to environmental health hazards. Hazardous work prohibitions for the federal government and every province except Punjab do not cover domestic work, for which there is evidence that children are exposed to physical abuse. (8,23,78) In 2019, Punjab Province adopted the Punjab Domestic Workers Act of 2019, which bans children under age 15 from working in any domestic service capacity, and permits only children under age 18 to perform light work that does not harm the child's health and safety or affect their education. (3,4,97,154) Although laws in Khyber Pakhtunkhwa, Punjab, and Sindh Provinces prohibit children under age 18 from working in underground mines or above-ground quarries, federal law—which also still applies in Balochistan—does not prohibit children ages 15 to 18 from working in mines. There is evidence that children in Balochistan are engaged in coal mining, which involves exposure to hazardous substances, work underground, and lethal accidents. (27,28,68,70,74,77,78,98)

Federal law, which also applies in all the provinces except Khyber Pakhtunkhwa, does not comply with international standards on child trafficking, as it does not omit the requirement of force, fraud, or coercion as elements of the crime. (80,81,85) Khyber Pakhtunkhwa Province's human trafficking law also requires the additional element of kidnapping, coercion, or receipt or giving of a benefit. (86)

Federal law, which also applies in Balochistan, does not prohibit the use of children for prostitution or the procuring and offering of children in commercial sexual exploitation, nor does Khyber Pakhtunkhwa's law. (80,81,86,87)

Federal and provincial laws, with the exception of Punjab and Sindh provinces, do not prohibit the use of children in drug production and drug trafficking. (74,77,86)

The federal and provincial governments, with the exception of Punjab and Sindh Provinces, have not enacted laws that prohibit the recruitment and use of children by non-state groups for armed conflict. (13,70,73)

As the minimum age for work is lower than the compulsory education age, children may be encouraged to leave school before the completion of compulsory education. (70,90-93)

III. ENFORCEMENT OF LAWS ON CHILD LABOR

The government has established institutional mechanisms for the enforcement of laws and regulations on child labor (Table 5). However, gaps exist within the operations of provincial labor inspectorates that may hinder adequate labor law enforcement.

Table 5. Agencies Responsible for Child Labor Law Enforcement

Organization/Agency	Role
Provincial and Regional Police	Enforce violations of federal and provincial laws concerning the worst forms of child labor, including the Pakistan Penal Code, Prevention of Trafficking in Persons Act, and the Bonded Labor System (Abolition) Act. Refer children taken into custody to Child Protection Officers. (13,97)
Provincial Labor Inspectors	Inspect industrial areas and markets to identify child labor violations, enforce provincial labor laws, and pursue legal action against employers. (13)
Federal Investigation Agency (FIA), Anti-Trafficking Unit	Enforces transnational human trafficking-related laws, particularly the Prevention of Trafficking in Persons Act. Cooperates with other governments on human trafficking cases, operates a hotline for victims, and publishes information on anti-trafficking efforts on its website. (3,4,10,41) Operates under the Ministry of the Interior. (4) In 2019, the FIA—in collaboration with UNODC—conducted a Regional Conference on Trafficking in Persons that enhanced regional cooperation and information sharing related to combating trafficking in persons. (102)
Labor Courts	Assesses penalties for labor violations. Located in each province and the Islamabad Capital Territory. (3,46,103-105)
District Vigilance Committees	Implement the Bonded Labor System (Abolition) Act and assist in rehabilitating bonded laborers via monitoring bodies. Consists of members of the public, civil society groups, lawyers, members of the media, and local government officials. Report to the District Magistrate. (13,41,46,79) Exists in all provinces except Balochistan and Khyber Pakhtunkhwa. (46)
Child Protection Units (CPU)	Take into custody at-risk children, including those rescued from exploitative labor situations. Present cases of children taken into custody to the Child Protection Court or the appropriate authority. Established in Punjab, Khyber Pakhtunkhwa, and Sindh Provinces. (86,88,102,106-108)

In 2019, the Punjab Provincial court ordered the provincial government to pay school fees for children working at brick kilns. (109) In addition, District Vigilance Committees (DVCs) are functioning in all of Punjab Province's 36 districts, as well in 29 districts in Sindh Province. (41,46,102) The ICT DVCs have begun taking legal efforts against brick kilns using child labor by imposing heavy fines issued under the supervision of the District Magistrate. (19)

Labor Law Enforcement

In 2019, labor law enforcement agencies in Pakistan took actions to combat child labor (Table 6). However, gaps exist within the operations of provincial labor inspectorates that may hinder adequate labor law enforcement, including limited financial and human resource allocation.

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Table 6. Labor Law Enforcement Efforts Related to Child Labor

Overview of Labor Law Enforcement	Related Entity	2018	2019
Labor Inspectorate Funding		Unknown (10)	Unknown (3)
Number of Labor Inspectors	National Total	Unknown (10)	Unknown (3)
	Balochistan	Unknown (10)	Unknown (3)
	Khyber Pakhtunkhwa	Unknown (10)	Unknown (3)
	Punjab	Unknown (10)	80 (3)
	Sindh	152(10)	120 (3)
Inspectorate Authorized to Assess Penalties	Balochistan	Unknown	No (3)
	Khyber Pakhtunkhwa	No (10)	No (3)
	Punjab	No (10)	No (3)
	Sindh	No (10)	No (3)
Initial Training for New Labor Inspectors	National	Yes (10)	Unknown (3)
	Balochistan	N/A	No (3)
	Khyber Pakhtunkhwa	Unknown	No (3)
	Punjab	Yes (10)	Yes (3)
	Sindh	N/A	Yes (3)
Training on New Laws Related to Child Labor	National	Yes (10)	Yes (3)
Training on New Laws Related to Child Labor	Khyber Pakhtunkhwa	Unknown	Unknown
Training on New Laws Related to Child Labor	Punjab	Unknown	Yes (3)
Refresher Courses Provided	National	Yes (10)	Yes (3)
Refresher Courses Provided	Khyber Pakhtunkhwa	Unknown	Unknown
Refresher Courses Provided	Punjab	Yes (10)	Yes (46)
Number of Labor Inspections Conducted	National Total	11,910 (110)	Unknown (3)
	Balochistan	Unknown (10)	Unknown (3)
	Khyber Pakhtunkhwa	Unknown (10)	Unknown (3)
	Punjab	51,798† (111)	Unknown (3)
	Sindh	Unknown (10)	Unknown (3)
Number Conducted at Worksite	Khyber Pakhtunkhwa	Unknown (10)	Unknown (3)
Number Conducted at Worksite	Punjab	Unknown (10)	Unknown (3)
Number of Child Labor Violations Found	National Total	Unknown (10)	Unknown (3)
	Punjab	98† (111)	940 (46)
	Khyber Pakhtunkhwa	Unknown (10)	Unknown (3)
	Sindh	Unknown (10)	Unknown (3)
Number of Child Labor Violations for Which Penalties Were Imposed	National Total	Unknown (10)	Unknown (3)
Number of Child Labor Violations for Which Penalties Were Imposed	Khyber Pakhtunkhwa	Unknown (10)	Unknown (3)
Number of Child Labor Violations for Which Penalties Were Imposed	Punjab	Unknown (10)	Unknown (3)
Number of Child Labor Penalties Imposed that Were Collected	Khyber Pakhtunkhwa	Unknown (10)	Unknown (3)
Number of Child Labor Penalties Imposed that Were Collected	Punjab	Unknown (10)	Unknown (3)
Routine Inspections Conducted	Federal	N/A	Unknown
	Balochistan	N/A	Yes (3)
	Khyber Pakhtunkhwa	Yes (10)	Yes (3)
	Punjab	Yes (10)	Yes (3)
	Sindh	N/A	Yes (3)
Routine Inspections Targeted	Khyber Pakhtunkhwa	Unknown (10)	Unknown
Routine Inspections Targeted	Punjab	Unknown (10)	Unknown
Unannounced Inspections Permitted	Federal	Yes (112)	Yes (112)
	Balochistan	N/A	Yes (113)
	Khyber Pakhtunkhwa	Yes (114)	Yes (114)
	Punjab	Yes (115)	Yes (115)
	Sindh	Yes (116)	Yes (116)

Table 6. Labor Law Enforcement Efforts Related to Child Labor (Cont.)

Overview of Labor Law Enforcement	Related Entity	2018	2019
Unannounced Inspections Conducted	Khyber Pakhtunkhwa	Unknown (10)	Unknown
Unannounced Inspections Conducted	Punjab	Unknown (10)	Unknown
Unannounced Inspections Conducted	Sindh	Unknown (10)	Unknown
Complaint Mechanism Exists	Balochistan	N/A	Yes (3)
	Khyber Pakhtunkhwa	Yes (10)	Yes (3)
	Punjab	Yes (10)	Yes (3)
	Sindh	N/A	Yes (3)
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Khyber Pakhtunkhwa	No (10)	No (3)
	Punjab	No (10)	No (3)

† Data are from January–September 5, 2018 (111)

Pakistan's provinces are responsible for enforcing labor laws, including those relevant to child labor law. (13) Provincial labor departments collect comprehensive data on labor law enforcement at the district level. However, there is neither a centralized federal repository for the data nor any regular mechanism for reporting it to the federal government; therefore, limited labor inspection data were available for inclusion in this report. (10)

Based on 2017 data, the number of labor inspectors is likely insufficient for the size of Pakistan's workforce, which includes approximately 64 million workers. According to the ILO's technical advice of a ratio approaching 1 inspector for every 15,000 workers in developing economies, Pakistan should employ about 4,259 labor inspectors. (118,119) Provincial labor inspectorates do not receive sufficient resources, which may hamper labor inspectors' ability to inspect workplaces. For example, labor departments in Khyber Pakhtunkhwa, Punjab, and Sindh Provinces did not provide funds to cover the cost of transportation to conduct inspections. (3,10) Furthermore, while labor inspectors do receive some initial training depending on their assigned province, this training is insufficient, as there is very little information provided that is specific to child labor issues and laws. (3,21,97,120,121)

The Punjab labor inspectorate conducted 10 training sessions for 185 labor inspectors at the Industrial Relations Institute. Further, the Punjab Labor Welfare Department registered 1,441 first investigative reports (FIRs), which are prepared by the police upon receiving information on violations of Punjab's child employment restrictions, and 616 FIRs for violations prohibiting child labor in brick kilns. (3,102) In Sindh Province, research found that inspectors stopped conducting unannounced inspections due to complaints of harassment filed against inspectors by employers. (124) Only labor courts can assess penalties for labor law violations; labor inspectors can only note the labor violation. (3,21)

Criminal Law Enforcement

In 2019, criminal law enforcement agencies in Pakistan took actions to combat child labor (Table 7). However, gaps exist within the operations of the criminal enforcement agencies that may hinder adequate criminal law enforcement, including reports of corruption and indifference on the part of investigative officials.

Table 7. Criminal Law Enforcement Efforts Related to Child Labor

Overview of Criminal Law Enforcement	2018	2019
Initial Training for New Criminal Investigators	Unknown (10)	Yes (3)
Training on New Laws Related to the Worst Forms of Child Labor	Unknown (10)	Unknown (3)
Refresher Courses Provided	Yes (110)	Unknown (3)
Number of Investigations	Unknown (10)	Unknown (3)
Number of Violations Found	Unknown (10)	Unknown (3)
Number of Prosecutions Initiated	Unknown (10)	Unknown (3)
Number of Convictions	Unknown (10)	Unknown (3)
Imposed Penalties for Violations Related to The Worst Forms of Child Labor	Unknown	Unknown (3)
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	Unknown (10)	No (3)

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In 2019, Pakistan’s Prime Minister directed the government to launch a new mobile application, “Mera Bacha Alert,” to improve reporting and reduce the number of abductions and sexual exploitation cases perpetrated against children. (125) The federal and provincial governments do not publish data on efforts to enforce criminal laws prohibiting the worst forms of child labor; it is unknown whether investigations, prosecutions, or convictions were undertaken or achieved for child labor crimes in 2019. (3) While training is provided to new criminal investigators, the training is inconsistent across Pakistan, and the training might not include information on child labor, child trafficking, or sexual exploitation of children. (3)

Research indicates that police corruption, particularly the taking of bribes from suspected perpetrators to ignore alleged crimes, continues to hamper Pakistan’s ability to eliminate child labor, especially in the brick kiln industry, factories, street scavenging, and the sexual abuse of children in *madrassas*. In addition, children, parents, or family members who report child labor incidents often lack faith that police will act in pursuit of justice. (26,54,52-51) Research also found that police sometimes act indifferently to reports of child labor or sexual exploitation, pointing to cultural differences as a rationale for abuse. Further, some police are reportedly afraid of being accused of blasphemy by religious clerics if they take action against the sexual abuse of children in *madrassas*. (26,54,126)

Of particular concern, in July 2019, a 14-year-old domestic worker reported substantial indicators of trafficking by her employer; a parliamentarian in Punjab, including sexual abuse and torture. While police registered the charges, they did not arrest the parliamentarian, allegedly because the provincial government did not allow them to do so. (46,127) The parliamentarian continued to pressure the victim to drop the charges. In January 2020, the Supreme Court set aside the extended three-year sentence imposed on a judge and his wife for cruelty to a child for subjecting a 10-year-old girl to torture and domestic servitude—the government’s first reported conviction of an official complicit in trafficking-related offenses in 10 years—and reinstated the initial sentence of one year’s imprisonment. (46,127)

IV. COORDINATION OF GOVERNMENT EFFORTS ON CHILD LABOR

The government has established mechanisms to coordinate its efforts to address child labor (Table 8). However, gaps exist that hinder the effective coordination of efforts to address child labor, including fulfilling mandates to establish coordinating mechanisms.

Table 8. Key Mechanisms to Coordinate Government Efforts on Child Labor

Coordinating Body	Role & Description
Provincial and Federal Tripartite Consultative Committees	Advise on the enforcement of labor laws, including child labor laws, and monitor the functioning of labor departments at the provincial level. Monitor the implementation of provinces’ proposed interventions on child and forced labor at the federal level. (128) Research was unable to determine whether these coordinating bodies were active during the reporting period.
Inter-Agency Task Force	Coordinates the anti-human trafficking efforts of the Ministry of the Interior, intelligence and law enforcement agencies, the Ministry of Law and Justice, and the Ministry of Foreign Affairs. Supports 27 FIA anti-trafficking units that work with provincial and district police officers to monitor and combat domestic and transnational human trafficking. (129,130) Maintains an Integrated Border Management System. In 2019, the Inter-agency Task Force logged a total of 1,539 human trafficking border interceptions. (3,102)

Table 8. Key Mechanisms to Coordinate Government Efforts on Child Labor (Cont.)

Coordinating Body	Role & Description
Child Protection Bodies	<p>Balochistan Child Protection Commission: Coordinates efforts related to child protection at the provincial and district levels, advises on relevant policies and legislation, and supports the implementation of child protection referral mechanisms. Led by the Balochistan Social Welfare Department, various government departments, including the Education, Health and Labor departments, and law enforcement agencies. (108) In 2019, the Balochistan Provincial Government launched the first CPU in Quetta in partnership with UNICEF (3)</p> <p>Khyber Pakhtunkhwa Child Protection and Welfare Commission: Coordinates efforts to enhance the safety, welfare, and well-being of children at the provincial and local levels. Reviews and monitors implementation of provincial laws and regulations related to child labor and those that affect the rights of children. (86) Led by the Province's Social Welfare, Special Education and Women Empowerment Department. (131) In 2019, the Khyber Pakhtunkhwa Government operated 10 welfare homes for exploited children. (46)</p> <p>Punjab Child Protection and Welfare Bureau: Coordinates the protection of destitute and neglected children by appointing child protection officers, supervising CPUs, and establishing child protection institutions and child protection courts. Chaired by an elected member of the board, which consists of three department secretaries, three members of the provincial assembly, and representatives from NGOs and academia. (88) In 2019, the Punjab Provincial Government collaborated with a mobile application developer to publish a mobile application that allows information sharing when children run away from home. It also established eight CPUs. (3,102) In 2019, the Punjab CPWB operated open reception centers to identify and register children living on the street and identified and assisted 8,114 children, a decrease from 10,203 in the previous reporting period. It also filed 616 First Information Reports (FIRs) under the Punjab Prohibition of Child Labour from Brick Kilns Act. (127)</p> <p>Sindh Child Protection Authority: Coordinates efforts to ensure the rights of children in need of special protection, including child laborers, by establishing CPUs and appointing child protection officers. Reviews and proposes amendments to existing laws and monitors the implementation of laws relevant to the protection of children. Headed by the provincial minister; members include two parliamentarians, lawyers, social activists, and representatives from departments that deal with children's issues. (107) In 2019, was in the process of launching a database that tracks child abuse cases, including the worst forms of child labor, in all 29 districts. It also established 12 CPUs and operated a 24-hour child protection hotline. (3,102)</p> <p>Provincial CPUs: Take into custody at-risk children, including those rescued from exploitative labor situations. Present cases of children taken into custody to the Child Protection Court or the appropriate authority. Established in Punjab, Khyber Pakhtunkhwa, and Sindh Provinces. (86,88,102,106-108) Coordinate and initiate interventions against child labor at the provincial level. (128) Each CPU is led by a Child Protection Officer and supported by social workers and psychologists. Operates under the District Administrator. (46) Established in Punjab, Khyber Pakhtunkhwa, and Sindh Provinces. (46) In 2019, the Government of Khyber Pakhtunkhwa established a specialized Child and Bonded Labor Unit; the rules and regulations by which this unit will operate have not yet been established. (102) Balochistan and Sindh Provinces and the Islamabad Capital Territory (ICT) made efforts to establish specialized Child and Bonded Labor Units. (132) Research was unable to determine whether the Punjab Provincial Child Labor Unit was active during the reporting period.</p>
Child Protection Advisory Board*	<p>Coordinates ICT's implementation of the Child Protection System Act of 2018, including advising the government on implementing laws and policies, maintaining a case management system, and ensuring that a child protection mechanism is functioning. Chaired by the Secretary of the Division of Child Protection and comprises high-level government officials, plus an NGO representative, a social science expert, an Islamabad High Court Bar Association representative, and one person representing minorities. (3,133) In 2019, 12 Child Protection Committees were established at the ICT level and began receiving orientation training on child trafficking laws. Further, the board met for the first time, chaired by the Minister for Human Rights, and agreed to form a subcommittee to plan long- and short-term policies to improve child protection issues in the ICT. (3,102,134)</p>

* Coordinating body responsible for coordinating government efforts on child labor was created during the reporting period.

The federal government had not established the National Commission on the Rights of the Child as mandated by law at the end of the reporting period. (3,46) Khyber Pakhtunkhwa has 12 CPUs, however, none were active during the reporting period due to a lack of finances. Balochistan established one CPU in Quetta, however, they have not yet instituted the remaining 33 CPUs despite passing legislation in 2016 to establish units in each district. (41,46)

V. GOVERNMENT POLICIES ON CHILD LABOR

The government has established policies related to child labor (Table 9). However, policy gaps exist that hinder efforts to address child labor, including mainstreaming child labor issues into relevant policies.

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Table 9. Key Policies Related to Child Labor

Policy	Description
Khyber Pakhtunkhwa Labor Policy	Seeks to gradually eradicate child labor; collect child labor statistics, enforce the compulsory education law, assist children through referral mechanisms, educate families and key stakeholders about the negative effects of child labor, and collaborate with organizations to research and develop solutions to eliminate child labor. (136) In 2019, an exclusive child labor unit was established under the Directorate of Labor. (21)
Punjab Labor Policy	Seeks to improve working conditions, eradicate child and bonded labor, and establish social safety for workers and their families. Includes the goal of ending all child labor in brick kilns, in addition to the construction of schools, hospitals, and residences for workers. (137) This policy led to the implementation of the Punjab Domestic Workers Act 2019 during the reporting period. (46)
Sindh Labor Policy	Seeks to protect vulnerable workers, including children. Includes goals to enforce laws dealing with hazardous child labor, extend the minimum age for employment in domestic and home-based work, ensure minimum wages for working children, and increase access to education and training. (138) While this policy was being instituted through labor inspector trainings during the reporting period, research found that labor inspectors were not provided funding to travel outside of major cities to conduct inspections and were repeatedly denied access to inspect factories by owners. (3)

‡ The government had other policies that may have addressed child labor issues or had an impact on child labor. (140-144)

Research was unable to determine whether the provincial or federal governments have educational policies and, if so, whether such policies include child labor elimination and prevention strategies. (140-143)

VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2019, the government funded and participated in programs that include the goal of eliminating or preventing child labor (Table 10). However, gaps exist in these social programs, including the adequacy of programs to address the full scope of the problem.

Table 10. Key Social Programs to Address Child Labor

Program	Description
Bait-ul-Mal Programs‡	Government-funded programs that aim to remove children from child labor, including its worst forms, and to increase vulnerable children's access to education. Programs include the National Centers for Rehabilitation of Child Labor and the Child Support Program. (145, 146) These programs were active in 2019. (3)
Hotlines	FIA operates a 24/7 hotline to combat human trafficking, including child trafficking, in Pakistan at the headquarters, ICT, and district levels. (4, 102) The Ministry of Human Rights (MOHR) also operates a hotline for reporting human rights violations, including child labor violations. In 2019, the MOHR hotline received between 4,000–15,500 calls per month. (4) The Punjab Child Protection and Welfare Bureau and Sindh Social Welfare Department also operate hotlines in their respective provinces to combat child exploitation. Both hotlines were operational in 2019. (4) Other provinces maintain functioning hotlines to report human trafficking incidents, including the commercial sexual exploitation of children. (102)
Elimination of Child Labor and Bonded Labor Project (Integrated Project for Promotion of “Decent Work for Vulnerable Workers” in Punjab Province)‡	Punjab Province-funded programs that aim to provide education to vulnerable children, rehabilitate bonded laborers working in brick kilns, promote integration and coordination of government responses, strengthen legislation, increase the capacity of law enforcement and service providers, and increase the knowledge base on these issues. (49, 147, 148) In 2019, this project provided children working in brick kilns with free education. (46)
ILO-Funded Projects	ILO projects in Pakistan that aim to eliminate child labor by improving the capacity of the national government to develop strong monitoring mechanisms and strengthen data collection strategies. The Sustaining Strengthened National Capacities to Improve ILS Compliance and Reporting in Relevant EU Trading Partners (2018–2020) works with provincial labor departments, with a focus on Balochistan, to use analytical and evidence-based initiatives to guide child labor elimination programs. (149) The Clear Cotton Project (2018–2022) works with local governments to eliminate child labor in cotton-growing districts and in the textile and garment sectors. (150) Research was unable to determine whether activities were undertaken to implement these projects during the reporting period.
Khdmat ATM Cards‡	Government-funded program to increase enrollment in schools that focuses on low income families. Provides approximately \$12.50 to a family whose child enrolls in school and then approximately \$6.25 per month to each child enrolled after verifying school attendance records. (132) This program was active in 2019.

Table 10. Key Social Programs to Address Child Labor (Cont.)

Program	Description
Sabaoon Rehabilitation Center†	NGO-run, federal government-funded center that rehabilitates children who were recruited and ideologically influenced by terrorist organizations and militant groups. Reintegrates youth into society by providing psychological treatment, education, and vocational training. (10,130,151) Research was unable to determine whether activities were undertaken to implement this program during the reporting period.

† Program is funded by the Government of Pakistan.

In 2019, the Provincial labor departments of Khyber Pakhtunkhwa and Balochistan dedicated approximately \$1.53 million and \$1.37 million of their budgets, respectively, to conduct surveys on child labor. The Khyber Pakhtunkhwa labor department began conducting its child labor survey Child labor survey during the reporting period. (46,102) Child labor surveys are also being carried out in Sindh and the ICT, while the child labor survey project in Balochistan is still being planned. (21) In addition, Khyber Pakhtunkhwa, Punjab, and Sindh Provinces established rehabilitation service centers for street children in 2019. These centers provided street children with education, health, career, and psychological counseling services. (46,132)

The social programs of the federal and provincial governments are insufficient to address the prevalence and scope of Pakistan's child labor problem. Existing programs also do not provide enough protection and rehabilitation services for bonded child laborers and victims of human trafficking. (110,129) Government initiatives are needed to specifically target child labor in the informal sector, including child labor and forced child labor in domestic work. (121) Furthermore, additional social programs are necessary to raise awareness and provide assistance to children used by non-state militant groups to engage in armed conflict. (152) In addition, there is no significant social program to address sexual abuse of child workers or children learning in *madrassas* in Pakistan.

VII. SUGGESTED GOVERNMENT ACTIONS TO ELIMINATE CHILD LABOR

Based on the reporting above, suggested actions are identified that would advance the elimination of child labor in Pakistan (Table 11).

Table 11. Suggested Government Actions to Eliminate Child Labor

Area	Suggested Action	Year(s) Suggested
Legal Framework	Accede to the Palermo Protocol on Trafficking in Persons.	2013 – 2019
	Establish a minimum age for work of at least 14 in all sectors and informal employment, regardless of the number of employees, including in federal law and the provinces.	2011-2019
	Ensure that the law prohibits the employment of children under age 18 in hazardous work, including in federal law and Balochistan Province.	2009 – 2019
	Ensure that the federal and provincial lists of hazardous work prohibited for children are comprehensive, including brickmaking, domestic work, and mining.	2009 – 2019
	Ensure that federal and provincial law criminally prohibits child trafficking without requiring an element of force, fraud, or coercion.	2019
	Ensure that the law prohibits the use of children in illicit activities, including in the production and trafficking of drugs, including in federal law and Balochistan and Khyber Pakhtunkhwa Provinces.	2011 – 2019
	Ensure that the law criminalizes the use, procurement, and offering of children in prostitution, pornography, and pornographic performances, including in federal law and Balochistan and Khyber Pakhtunkhwa Provinces.	2011 – 2019
	Ensure that the law criminally prohibits the recruitment and use of children under age 18 by non-state groups for armed conflict, including in federal law and Balochistan and Khyber Pakhtunkhwa Provinces.	2015 – 2019
	Raise the minimum age for work to the age up to which education is compulsory.	2019

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Table 11. Suggested Government Actions to Eliminate Child Labor (Cont.)

Area	Suggested Action	Year(s) Suggested
Enforcement	Ensure there are a sufficient number of inspectors trained and responsible for providing enforcement of child labor laws to meet international standards in Punjab Province.	2019
	Provide the funding necessary to adequately hire, train, equip, and cover the cost of transportation for inspectors to enforce child labor laws, especially in Khyber Pakhtunkhwa, Punjab and Sindh provinces.	2010-2019
	Ensure labor inspectors are permitted to conduct unannounced inspections in Sindh Province without harassment, as mandated by Sindh's labor code.	2019
	Ensure that District Vigilance Committees that seek to ensure enforcement and implementation of bonded labor prohibitions are established in Khyber Pakhtunkhwa and Balochistan Provinces.	2013-2019
	Ensure all allegations of sexual abuse, including allegations of <i>bacha bazi</i> and trafficking of boys into Afghanistan, are thoroughly investigated and, where appropriate, prosecuted.	2019
	Allow labor inspectors to assess penalties.	2011 – 2019
	Create a centralized repository of labor law enforcement data and a regular mechanism for reporting it to the federal government, and make the data publicly available.	2018 – 2019
	Increase the number of labor inspectors to meet the ILO's technical advice.	2016 – 2019
	Publish enforcement data for child labor law violations, penalties imposed, and penalties collected for all provinces. In addition, publish information about labor inspectorate funding, the number of labor inspectors, the number of labor inspections conducted at the worksite, whether routine inspections were targeted, and whether unannounced inspections were conducted for all provinces.	2010 – 2019
	Establish sufficient laws to end police corruption, particularly the taking of bribes from suspected perpetrators to ignore alleged crimes.	2019
	Establish a referral mechanism between criminal law enforcement agencies and social services in all provinces.	2018 – 2019
	Publish information about criminal law investigations, violations found, prosecutions initiated, and the number of convictions, as well as initial training, training on the worst forms of child labor, refresher courses, and penalties imposed and collected in all provinces.	2016 – 2019
	Establish a referral mechanism between labor authorities and social services in all provinces.	2017 – 2019
	Coordination	Establish a National Commission on the Rights of the Child Act, as mandated by federal law.
Publish information on the activities undertaken by the Provincial and Federal Tripartite Consultative Committees.		2017 – 2019
Establish the remaining 32 CPUs in Balochistan as required by law.		2019
Government Policies	Ensure inspectors are provided with sufficient resources and are not stymied from executing Sindh Province's Labor Policy by factory owners.	2019
	Integrate child labor elimination and prevention strategies in the education policies of the provincial governments.	2014 – 2019
Social Programs	Complete and publish child labor surveys at the federal and provincial levels.	2009 – 2019
	Publish information on activities undertaken during the reporting period to implement the ILO-funded programs Sustaining Strengthened National Capacities to Improve ILS Compliance and Reporting in Relevant EU Trading Partners (2018–2020) and The Clear Cotton Project (2018-2022).	2019
	Publish information on activities undertaken by Sabaoon Rehabilitation Center during the reporting period.	2019
	Implement programs to address and eliminate the sexual abuse of children, especially in <i>madrassas</i> , workplaces, and on the street.	2019
	Improve existing programs and increase the size and scope of government programs to reach children working in the informal sector and in the worst forms of child labor, including domestic workers, bonded child laborers, and other victims of human trafficking.	2009 – 2019
	Implement programs to address high rates of teacher absenteeism, inadequate facilities, lack of transportation, and use of corporal punishment to ensure that all children have access to free and compulsory education, as required by law. Increase security for schools to protect children and teachers from attacks by non-state armed and extremist groups.	2011 – 2019
	Implement programs to raise awareness of and provide assistance to children used by non-state militant groups to engage in armed conflict.	2011 – 2019

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