

MINIMAL ADVANCEMENT – EFFORTS MADE BUT CONTINUED PRACTICE THAT DELAYED ADVANCEMENT

In 2021, Pakistan made minimal advancement because it continued to implement practices that delay advancement to eliminate the worst forms of child labor. During the reporting period, the Pakistani federal government and some provincial governments enacted legislation to address the worst forms of child labor, including bills prohibiting hazardous work for children under 14 years in Balochistan; banning corporal punishment of children, including in domestic work; and establishing special courts dedicated to child protection. Additionally, the Federal Investigative Authority provided training for Pakistani police, social welfare and labor departments, and child protection bureaus at the central and provincial levels. The Child Protection and Welfare Bureau rescued over 1,000 children from begging in Punjab and referred 1,500 to 2,000 children for psychological counseling. However, despite new initiatives to address child labor, Pakistan is assessed as having made only minimal advancement because it continued to implement practices that delays advancement to eliminate child labor. Pakistan continued to support the Taliban in Afghanistan, and reports indicate that the Taliban recruited and used child soldiers during the reporting period. Children in Pakistan are subjected to the worst forms of child labor, including forced domestic work and forced labor in brick manufacturing and agriculture. Additionally, provincial labor inspectorates do not have sufficient resources to adequately enforce laws prohibiting child labor, and the federal and provincial governments did not publicly release information on their labor and criminal law enforcement efforts. Furthermore, police corruption, particularly the taking of bribes from suspected perpetrators to ignore child labor crimes and a lack of willingness to conduct criminal investigations, hindered Pakistan's ability to address child labor throughout the country.



I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Pakistan are subjected to the worst forms of child labor, including forced domestic work. Children also engage in forced labor in brick manufacturing, and agriculture. (1,2) 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.

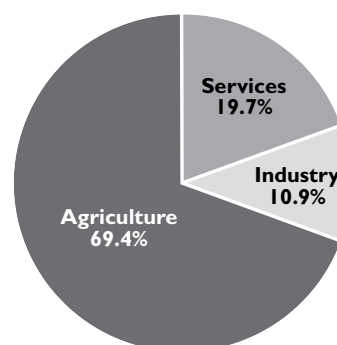
Table I. Statistics on Children's Work and Education

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		72.9
	Punjab Province		Unavailable
	Sindh Province		Unavailable

Source for primary completion rate: Data from 2019, published by the UNESCO Institute for Statistics, 2022. (3)

Source for all other data: International Labor Organization's analysis of statistics from Labour Force Survey (LFS), 2017–2018 and from the Multiple Indicator Cluster Survey 5, 2014. (4)

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, sugarcane, and wheat (1,5)
	Fishing, including deep sea fishing† (6,7)
	Poultry farming (8)
Industry	Manufacturing glass bangles,† surgical instruments,† and jewelry (1,6,9-15)
	Weaving carpets,† producing garments, and tanning leather† (6,9,12,13,16-19)
	Producing bricks (1,9,10,13,17-22)
	Mining coal† and gemstones, and crushing stone† (6,17,20,23,24)
	Construction (8)
Services	Domestic work (1,10,25,26)
	Working in hotels, restaurants, gas stations, and automobile repair (1,9,10,17,19,27,28)
	Scavenging† and sorting garbage and recyclables, begging, and street vending (2,19,27,29,30)
Categorical Worst Forms of Child Labor‡	Forced labor in agriculture, brickmaking, carpet weaving, and coal mining (1,9,31)
	Forced domestic work (9,25,31)
	Commercial sexual exploitation, including use in the production of pornography, sometimes as a result of human trafficking (1,9,10,13,31-35)
	Forced begging (9,31)
	Recruitment of children by non-state armed groups for use in armed conflict (2,31)
	Use in illicit activities, including the trafficking and production of drugs (2,19,36)

† 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, and 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. (37,38) When available, data and information are included for the federal and provincial governments in this report. Pakistan's federal and provincial governments, with technical assistance provided by UNICEF, continued conducting nationwide child labor surveys through 2021. (2) 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. (2,25) The COVID-19 pandemic has delayed the completion of the survey until 2022. (2)

Child laborers in Pakistan are sometimes subjected to sexual abuse at their places of employment, including in factories, workshops, or while scavenging on the streets. (39) They are also sometimes subjected to sexual exploitation to obtain or keep their jobs or accommodations. (39,40) According to reports, 35 percent of reported child abuse cases across Pakistan occurs in the workplace. (41) Traffickers promise Pakistani boys admittance to Afghan religious schools but then sell them to members of the Afghan security forces for *bacha bazi*, a practice in which boys are forced to provide social and sexual entertainment for older men. (31)

While there is limited data collection and underreporting to assess the extent of commercial sexual exploitation of children in Pakistan, research has found there were almost 3,000 cases of child right abuses in the reporting year of which 1,800 were related to sexual abuse. Child domestic workers sometimes work under conditions of forced labor, including debt bondage, sexual assault, and extreme physical abuse. (9,25,26,31) Poor rural families sometimes sell their children into domestic servitude or other types of work, or pay agents to arrange for such work, often believing their child would work under decent conditions. Some children are also kidnapped or sold into organized begging rings, domestic servitude, gangs, and child sex trafficking. (37,31) Children in domestic servitude are vulnerable to violence because they work in private residences outside the purview of labor inspectors. (2) Reports estimate that around 70 percent of bonded laborers in Pakistan are children, and they

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make up one-third of the 4 million people working in brick kilns. (2,22) Some children work with their families as bonded laborers in the production of bricks. (9,10,22,31) In Sindh Province, almost 700,000 children work as bonded laborers in the agricultural sector. (2)

Begging ringmasters sometimes maim children to earn more money or force children to steal. (31) Organized criminal groups reportedly force Afghan, Iranian, and Pakistani children, particularly from Dalbadin and Quetta in Balochistan into drug trafficking in Sindh and Balochistan Provinces, and in parts of Karachi. (9,31,37) Children are also used in smuggling operations along the Afghan border with Khyber Pakhtunkhwa. (2,8) In Karachi, an estimated 20,000 children, the majority of them from Afghan origin, are found engaged in scavenging. (2) Various factors can compound vulnerability to child labor, including religious minority and caste status. Marginalized minority communities, such as Christian and Hindu Dalits, are likely to be less educated, to lack land or other assets, and to be discriminated against by their surrounding communities, police, and judicial systems. (31,8)

Children in Pakistan face several barriers to education. In line with global trends, the pandemic exacerbated lack of access to education during the reporting period. Some schools were intermittently closed, offering only online classes. (2,42) There was insufficient internet coverage in many rural areas, especially in Khyber Pakhtunkhwa Province, which hampered children's access to meaningful learning. (2,42) A recent survey found that 3.7 million children ages 5 to 16 in Khyber Pakhtunkhwa did not attend school during the reporting period, an increase from 2.1 million in 2018. Similarly, studies reported that 7.7 million children in Punjab and 6.4 million children in Sindh did not attend schools. (2) 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. (2,11,43)

Sexual abuse of children in Pakistan's *madrassas*—Islamic religious schools that provide free education and meals to Pakistan's poorest children—is also of significant concern. (44-47) Pakistan currently has around 36,000 registered and unregistered *madrassas*; sexual abuse in *madrassas* significantly hinders the ability of a large number of Pakistani children to attend school and receive an education. (44,45,47) A report on a school-based sexual abuse prevention program from 2018 found that there were approximately 18,000 children who were victims of child sexual abuse in Pakistan in the past five years. (2,48)

Non-state armed militant groups reportedly kidnap children as young as age 12, coerce parents with threats, and recruit children forcibly from *madrassas* to spy, fight, and carry out suicide attacks. (31,49,50) Schools in Pakistan may still be vulnerable to attacks by unknown armed groups, disrupting children's access to education. (2,9,11,13,37,51) The government operated a center in Swat, Khyber Pakhtunkhwa, to rehabilitate, educate, and reintegrate former child soldiers. (52)

According to reports, the Taliban in Afghanistan recruited at least 34 children for various roles with its organization in the first half of 2021, including for use in combat, making and transporting improvised explosive devices, and acting as bodyguards. (53) Information on the Taliban's recruitment and use of children during the second half of the year could not be documented due to the departure of UN organizations and other monitoring entities from the country. (53)

As the Taliban took over Afghanistan, the Pakistani military provided new fighters to the Taliban from inside Pakistani sanctuaries. Pakistan government provided the Taliban with services, including safe havens, medical assistance, and real estate deals. (54,55) In June 2021, the U.S. Department of State released its annual list mandated by the Child Soldiers Prevention Act that included Pakistan as a government that recruited and used child soldiers or supported armed groups that do so. (56)




II. LEGAL FRAMEWORK FOR CHILD LABOR

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

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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 at federal and provincial level 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	15	Section 50 of the Factories Act; Section 20 of the West Pakistan Shops and Establishments Ordinance; Section 26 of the Mines Act; Section 3 of the Road Transport Workers Ordinance; Section 3 and 7 of the Pakistan Employment of Children Act- 1991 (57-61)
	Balochistan	Yes	15	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 (57-60)
	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; Section 7 of the Khyber Pakhtunkhwa Home Based Workers (Welfare and Protection) Bill, 2021 (62-65)
	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 2019. (66-68)
	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 (69-71)
Minimum Age for Hazardous Work	Federal	No	14	Sections 2 and 3 of the Employment of Children Act (61)
	Balochistan	No	14	Sections 2 and 3 of the Employment of Children Act (61)
	Khyber Pakhtunkhwa	Yes	18	Sections 2(1)(a) and 3(2) of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (62)
	Punjab	Yes	18	Section 3(2) of the Punjab Restriction on Employment of Children Ordinance (67)
	Sindh	Yes	18	Section 3(2) of the Sindh Prohibition of Employment of Children Act (71)
Identification of Hazardous Occupations or Activities Prohibited for Children	Federal	Yes		Parts 1 and 2 of the Schedule of the Employment of Children Act (61)
	Balochistan	Yes		Parts 1 and 2 of the Schedule of the Employment of Children Act (61)
	Khyber Pakhtunkhwa	Yes		Parts 1 and 2 of the Schedule of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (62)
	Punjab	Yes		Schedule of Hazardous Work of the Punjab Restriction on Employment of Children Ordinance (67)
	Sindh	Yes		Schedule of Hazardous Work of the Sindh Prohibition of Employment of Children Act (71)

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

Standard	Related Entity	Meets International Standards	Age	Legislation
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 (72-74)
	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 (72-74)
	Khyber Pakhtunkhwa	Yes		Sections 2(j) and 3 of the Khyber Pakhtunkhwa Bonded Labor System (Abolition) Act (75)
	Punjab	Yes		Section 11(3) of the Punjab Restriction on Employment of Children Ordinance; Section 4 of the Punjab Bonded Labor System (Abolition) Act (67,76)
	Sindh	Yes		Section 4 of the Sindh Bonded Labor System (Abolition) Act (77)
Prohibition of Child Trafficking	Federal	Yes		Sections 3, 4 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A, 366B, 370, and 371 of the Penal Code; Sections 2 and 3 of the Prevention and Control of Human Trafficking Ordinance (73,74,78)
	Balochistan	Yes		Sections 1, 3, 4 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A, 366B, 370, and 371 of the Penal Code; Sections 2 and 3 of the Prevention and Control of Human Trafficking Ordinance (73,74,78)
	Khyber Pakhtunkhwa	Yes		Sections 2 and 52 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (83); Sections 1, 3, 4 and 7 of the Prevention of Trafficking in Persons Act (74,79)
	Punjab	Yes		Sections 1, 3, 4 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A, 366B, 370, and 371 of the Penal Code; Sections 2 and 3 of the Prevention and Control of Human Trafficking Ordinance (73,74,78)
	Sindh	Yes		Sections 1, 3, 4 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A, 366B, 370, and 371 of the Penal Code; Sections 2 and 3 of the Prevention and Control of Human Trafficking Ordinance (73,74,78)
Prohibition of Commercial Sexual Exploitation of Children	Federal	Yes		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; Sections 377A and 292B of the Second Amendment to the Criminal Code (2016) (73,74,80)
	Balochistan	Yes		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, Sections 377A and 292B (2016) (73,74,80)
	Khyber Pakhtunkhwa	Yes		Sections 2, 48, and 53 of the Khyber Pakhtunkhwa Child Protection and Welfare Act; Second Amendment to the Criminal Code, Section 377A, 292(B) (2016) (79,80)
	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 (67,81)
	Sindh	Yes		Section 14.1(b) of the Sindh Prohibition of Employment of Children Act (71)
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 (79)
	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 (67,81)
	Sindh	Yes		Section 14.1(c) of the Prohibition of Employment of Children Act (71)
Minimum Age for Voluntary State Military Recruitment	Federal	Yes	18	Section 3 of the National Service Ordinance (82)

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

Standard	Related Entity	Meets International Standards	Age	Legislation
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 (67)
	Sindh	Yes		Section 14.1(c) of the Prohibition of Employment of Children Act (71)
Compulsory Education Age	Federal	Yes	16	Section 3 of the Right to Free and Compulsory Education Act (83)
	Balochistan	Yes	16	Section 3 of the Balochistan Compulsory Education Act (84)
	Khyber Pakhtunkhwa	Yes	16	Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (85)
	Punjab	Yes	16	The Punjab Free and Compulsory Education Ordinance (86)
	Sindh	Yes	16	Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (87)
Free Public Education	Federal	Yes		Section 3 of the Right to Free and Compulsory Education Act (83)
	Balochistan	Yes		Section 2(f) of the Balochistan Compulsory Education Act (84)
	Khyber Pakhtunkhwa	Yes		Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (85)
	Punjab	Yes		The Punjab Free and Compulsory Education Act (86)
	Sindh	Yes		Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (87)

* Country has no conscription (82)

† 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. (57,59)

‡ The minimum age for work in brick kilns is 14 years old. The minimum age for work in domestic work is 15 years old. (66,68)

The Eighteenth Amendment to the Pakistani Constitution permits provinces to pass laws that govern labor law and children's welfare. (88,89) Federal law applies only until the province passes a law on the same subject. (88) The ICT administration banned child domestic labor in the capital territory in 2020 in response to an employer's fatal beating of an 8-year-old girl who was being illegally employed as a domestic worker. The government also added child domestic labor to the list of occupations defined as hazardous work prohibited for children under the Employment of Children Act 1991. (2,90,91) In 2021, the Khyber Pakhtunkhwa provincial assembly approved the Khyber Pakhtunkhwa Home Based Workers (Welfare and Protection) Bill, 2021, which bans domestic work and forced labor of children under age 14 years in the province. (2,92) In addition, the Punjab Domestic Workers Act instituted a ban on child domestic work for any child under age 15. (93)

In 2021, the Pakistan National Assembly passed the National Commission on the Rights of the Child (Amendment Bill), 2021 and the Islamabad Capital Territory Child Protection (Amendment Bill), 2021. The amendments allow appropriate government ministries to administer relevant issues related to child rights and protection instead of the federal cabinet. (94) This legislation would ensure that child rights issues are addressed in a timely and effective manner. (94) However, the bills are pending passage in the Senate. (2) Additionally, in February and September 2021, the government enacted a law that prohibits corporal punishment of children in all workplaces and education institutions in the ICT, providing a new way to address the physical abuse of child domestic workers under the law. (2,95) In Sindh, the government passed the Sindh Child Protection Authority (Amendment) Bill, 2021, which requires law enforcement to file the first information report regarding a missing or abducted child within 4 hours. A section of the bill entitled Establishment of Special Courts requires the

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creation of special courts for child protection in each district in Sindh that would try cases under the Sindh Child Protection Authority Act within 120 days. (96) However, the implementation of the law has not yet begun. (2) In April, the Balochistan Assembly passed the Balochistan Forced and Bonded Labor System (Abolition) Act 2021 and the Balochistan Employment of Children (Prohibition and Regulation) Act 2021. The Bonded Labor Act banned hazardous work for children under age 14 and established a Committee on the Rights of the Child. (2) Furthermore, the act made it punishable for employers to pay wages to children and adolescents that are not equal to adults. (2)

Some of Pakistan’s federal and provincial laws are not in compliance with international standards on child labor. The federal minimum age for work provisions and 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. (57-62,64-71) The federal government’s minimum age for hazardous work is age 14, which does not comply with international standards. (61) The federal minimum age for hazardous work still applies in Balochistan Province, as Balochistan has not established a minimum age for hazardous work. (61,97)

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. (17,98,99) Additionally, hazardous work prohibitions for the federal and provincial governments do not cover child domestic work, for which there is evidence that children are exposed to physical abuse. (2,100) However, the federal government, at the request of the Ministry of Human Rights expanded the hazardous occupation list to include child domestic labor in the ICT. (2) 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. (23,59,62,66,71,97,101)

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. (67,71,79) 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. (7,62,67) 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. (62,83-87)

III. ENFORCEMENT OF LAWS ON CHILD LABOR

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

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 (BLSA). Refer children taken into custody to Child Protection Officers. (7,90)
Provincial Labor Inspectors	Inspect industrial areas and markets to identify child labor violations, enforce provincial labor laws, and pursue legal action against employers. (7)
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 survivors, and publishes information on anti-trafficking efforts on its website. (9-11,40) Operates under the Ministry of Interior. (10) The Ministry and FIA, along with other civil society groups, have published the National Action Plan to Combat Human Trafficking and Migrant Smuggling 2021-2025. (31)
Labor Courts	Assess penalties for labor violations. Located in each province and the Islamabad Capital Territory (ICT). (9,37,102-103)

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Table 5. Agencies Responsible for Child Labor Law Enforcement (Cont.)

Organization/Agency	Role
District Vigilance Committees	Implement the BLSA and assist in rehabilitating bonded laborers via monitoring bodies. Consist of members of the public, civil society groups, lawyers, members of the media, and local government officials and report to the District Magistrate. (7,40,37,72) Exist in Punjab, Sindh, and the ICT, but not in Balochistan and Khyber Pakhtunkhwa Provinces. (37)
Child Protection Units (CPUs)	Take into custody at-risk children, including those rescued from exploitative labor situations and provide case management services. Established in Punjab, Khyber Pakhtunkhwa, and Sindh Provinces. (79,81,104-107) Despite passing the legislation in 2016, Balochistan only has one CPU in Quetta. The remaining 33 CPUs are yet to be established. (94)

District Vigilance Committees (DVCs) are functioning in all of Punjab Province's 36 districts (conducting 367 meetings during the reporting period), and in 29 districts in Sindh Province (only 14 DVCs convened once each during the reporting period). (2,31,37,94,104) On December 31, 2021, the Khyber Pakhtunkhwa government issued orders to establish DVCs in all of Khyber Pakhtunkhwa's districts to monitor and implement laws related to child and bonded labor. (94)

However, research has found that though the Bonded Labor System (Abolition) Act (BLSA) mandated the creation of DVCs in each province to ensure implementation of the BLSA, including reporting and filing cases, the government relied on bonded labor victims to have knowledge of the BLSA, proactively leave their landowners, and file their own cases in the court. Even when bonded laborers did so, the courts either did not act on such claims or handled them administratively, and, as a result, human trafficking survivors who came forward often faced retaliation from their exploitative employers. (31,40)

Labor Law Enforcement

In 2021, labor law enforcement agencies in Pakistan took actions to address child labor (Table 6). However, gaps exist within the operations of the provincial labor departments that may hinder adequate labor law enforcement, including lack of research on the number of labor inspections conducted and child labor violations found.

Table 6. Labor Law Enforcement Efforts Related to Child Labor

Overview of Labor Law Enforcement	Related Entity	2020	2021
Labor Inspectorate Funding		Unknown (1)	Unknown (2)
Number of Labor Inspectors	Federal	Unknown (1)	Unknown (2)
	Balochistan	59 (1)	59(2)
	Khyber Pakhtunkhwa	Unknown (1)	Unknown (2)
	Punjab	102 (108)	Unknown (2)
	Sindh	120 (1)	120(2)
Mechanism to Assess Civil Penalties	Federal	Yes (61)	Yes (61)
	Balochistan	Yes (109)	Yes (109)
	Khyber Pakhtunkhwa	Yes(62)	Yes (62)
	Punjab	Yes (67)	Yes (67)
	Sindh	Yes (71)	Yes(71)
Initial Training for New Labor Inspectors	Federal	Unknown	Yes (2)
	Balochistan	Yes (1)	Yes (2)
	Khyber Pakhtunkhwa	Yes (1)	Yes (2)
	Punjab	Yes (1)	Yes (2)
	Sindh	Yes (1)	Yes (2)
Training on New Laws Related to Child Labor	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Unknown (2)
	Khyber Pakhtunkhwa	Unknown (1)	Unknown (2)
	Punjab	Unknown (1)	Yes (2)
	Sindh	Unknown (1)	Unknown (2)

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

Overview of Labor Law Enforcement	Related Entity	2020	2021
Refresher Courses Provided	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Yes (2)
	Khyber Pakhtunkhwa	Unknown (1)	Yes (2)
	Punjab	Unknown (1)	Yes (2)
	Sindh	Unknown (1)	Yes (2)
Number of Labor Inspections Conducted	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Unknown (2)
	Khyber Pakhtunkhwa	Unknown (1)	Unknown (2)
	Punjab	29,289 (1)	49,363(2)
	Sindh	Unknown (1)	Unknown (2)
Number Conducted at Worksites	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Unknown (2)
	Khyber Pakhtunkhwa	Unknown (1)	Unknown (2)
	Punjab	Unknown (1)	Unknown (2)
	Sindh	Unknown(1)	Unknown (2)
Number of Child Labor Violations Found	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown(1)	Unknown (2)
	Khyber Pakhtunkhwa	Unknown (1)	Unknown (2)
	Punjab	1,771 (1)	1,029(2)
	Sindh	Unknown (1)	Unknown (2)
Number of Child Labor Violations for Which Penalties Were Imposed	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Unknown (2)
	Khyber Pakhtunkhwa	Unknown (1)	Unknown (2)
	Punjab	Unknown (1)	Unknown (2)
	Sindh	Unknown (1)	Unknown (2)
Number of Child Labor Penalties Imposed that Were Collected	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Unknown (2)
	Khyber Pakhtunkhwa	Unknown (1)	Unknown (2)
	Punjab	Unknown (1)	Unknown (2)
	Sindh	Unknown (1)	Unknown (2)
Routine Inspections Conducted	Federal	Unknown (1)	Yes (2)
	Balochistan	Yes (1)	Yes (2)
	Khyber Pakhtunkhwa	Yes (1)	Yes (2)
	Punjab	Yes (1)	Yes (2)
	Sindh	Yes (1)	Yes (2)
Routine Inspections Targeted	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Unknown (2)
	Khyber Pakhtunkhwa	Unknown (1)	Unknown (2)
	Punjab	Yes (1)	Yes (2)
	Sindh	Unknown (1)	Unknown (2)
Unannounced Inspections Permitted	Federal	Yes (1)	Yes (2)
	Balochistan	Yes (1)	Yes (2)
	Khyber Pakhtunkhwa	Yes (1)	Yes (2)
	Punjab	Yes (1)	Yes (2)
	Sindh	Yes (1)	Yes (2)
Unannounced Inspections Conducted	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Yes (2)
	Khyber Pakhtunkhwa	Unknown (1)	Yes (2)
	Punjab	Yes (1)	Yes (2)
	Sindh	Unknown (1)	Yes (2)

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

Overview of Labor Law Enforcement	Related Entity	2020	2021
Complaint Mechanism Exists	Federal	Unknown(1)	Yes (2)
	Balochistan	Yes (1)	Yes (2)
	Khyber Pakhtunkhwa	Yes (1)	Yes (2)
	Punjab	Yes (1)	Yes (2)
	Sindh	Yes (1)	Yes (2)
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Federal	Unknown (1)	Unknown (2)
	Balochistan	Unknown (1)	Unknown (2)
	Khyber Pakhtunkhwa	No (1)	Unknown (2)
	Punjab	No (1)	Unknown (2)
	Sindh	Unknown (1)	Unknown (2)

Pakistan's provinces are responsible for enforcing labor laws, including those relevant to child labor law. (7) 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 them to the federal government; therefore, limited labor inspection data were available for inclusion in this report. (2,11) Although the number of labor inspectors is unknown, according to the ILO's technical advice of a ratio approaching 1 inspector for every 15,000 workers in developing economies, Pakistan would need to employ roughly 4,135 labor inspectors as its workforce consists of more than 62 million workers. (110)

Current labor laws do not apply to domestic workers, even though the ICT recently recognized domestic labor as a hazardous occupation, and despite reports of more than 264,000 child domestic workers in Pakistan. (2,31) Reports of physical abuse, sexual abuse, and forced labor by employers are commonplace; however, provincial labor laws and protections do not extend to adult or child domestic workers. (31) Provincial labor inspectorates do not receive sufficient resources, a shortfall that 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. (9,11) In Sindh, labor inspectors do not receive funding to travel outside Karachi and Hyderabad to conduct labor inspections, which is only a small portion of the whole province. Labor inspectors use their personal resources to carry out inspections. (2)

While labor inspectors 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. (9,17,90,111) In addition, labor inspectorates sometimes failed to conduct inspections at worksites owned by influential citizens. For instance, coal mines in Balochistan that are owned by influential politicians who oversee mine regulations operated with impunity, increasing risks of child labor. (24) Labor inspectors in Punjab reportedly do not inspect private farms owned by influential landlords for child or bonded labor. (2,36) In the Sindh region, labor inspectors frequently announce labor inspections, unless a complaint has been filed. (2) Moreover, due to the pandemic, labor inspectors have faced restrictions to conducting inspections. (2) Research found that in the Provinces of Sindh, Punjab, and Balochistan, the industries of agriculture, brick kiln, fisheries, poultry, mining, construction, domestic labor, and carpet making often failed to follow labor laws with no or little government oversight. Small- and medium-size businesses—particularly those operated in private homes and not subject to inspections, such as shops, garages, and jewelry manufacturers—employed child labor. (8) Department of Labor officials sometimes reportedly received monthly bribes to avoid factory inspections. Additionally, research supports that labor inspectors do not have the authority to remove children from exploitation situations. (31)

In 2021, a judicial decree ordered freedom for 1,451 bonded laborers between January and September 2021. In April and July 2021, a court order in Sindh ordered law enforcement to free 33 bonded laborers from different family units working in farms across the Sindh Province. (112) The Labor Department also signed an MOU with the Sindh government to ensure all the 29 DVCs in Sindh accurately followed the Sindh Bonded Labor Abolition Act of 2015. Similarly, the Balochistan Provincial Assembly passed the Balochistan Forced and Bonded Labor System Act on May 4, 2021. The law states that “the bonded labor system shall stand abolished and every bonded laborer shall stand freed and discharged from any obligation to render any bonded labor.” (112)

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A majority of the estimated 18,000 brick kilns in Pakistan continued to operate without registration and required benefits for workers, particularly those ages 14 to 18. (40) Additionally, in most cases, survivors of bonded labor settled for financial arrangement rather than criminal prosecution because there is a lack of guidance on a mechanism to pursue a formal civil or criminal case. (31)

In January 2021, the Islamabad High Court established a commission to examine the enforcement of labor laws related to the operation of brick kilns in the capital territory. The commission was mandated to inspect all brick kilns in the ICT, conduct a survey of brick kiln workers, and submit a report on its findings. (113) The commission's report, which was submitted in February 2021, found that the practice of debt bondage was widespread throughout the sector; no brick kilns or their laborers possessed the registrations required under the law, workers were not paid beyond a meager subsistence allowance and most lacked identity documents, and few children of brick workers were receiving an education. (114) The Islamabad High Court has ordered all bonded labor be eradicated from the ICT region, but research was unable to determine whether the ICT government took any action to carry out the order. Additionally, the ICT government has not taken action on the report's recommendations to register all brick kilns, ensure the execution of employment contracts for all workers, and issue national identity cards to all workers and their children. (115)

Criminal Law Enforcement

In 2021, criminal law enforcement agencies in Pakistan took actions to address 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	2020	2021
Initial Training for New Criminal Investigators	Unknown (1)	Unknown (2)
Training on New Laws Related to the Worst Forms of Child Labor	Unknown (1)	Unknown (2)
Refresher Courses Provided	Unknown (1)	Unknown (2)
Number of Investigations	Unknown (1)	Unknown (2)
Number of Violations Found	Unknown (1)	Unknown (2)
Number of Prosecutions Initiated	Unknown (1)	Unknown (2)
Number of Convictions	Unknown (1)	Unknown (2)
Imposed Penalties for Violations Related to the Worst Forms of Child Labor	Unknown (1)	Unknown (2)
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	No (1)	Unknown (2)

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 how many investigations, penalties imposed and collected, initial refresher training, or convictions were undertaken for child labor crimes in 2021. (1,2) However, some reports have shown that the Cyber Crime Circle of the Federal Investigation Agency (FIA) apprehended 13 people in 4 raids in Faisalabad and Punjab. (2) The alleged perpetrators were charged with child pornography. In October 2021, the FIA also arrested two people in Faisalabad for involvement in child pornography. (2,116) Additionally, in January 2021, police in Lahore arrested employers for torturing a 12-year old maid to death. (117) Similarly in October 2021, two minor domestic workers were tortured by employers in Lahore. The children were subsequently rescued. (2,118)

During the reporting period, the FIA provided in-person and online training on human anti-trafficking standards procedures with Pakistani police and social welfare departments, labor departments, and child protection bureaus at the central and provincial levels. The FIA also worked with the IOM to deliver trainings on identifying, screening, and referring human trafficking victims, which included child labor survivors. (2) While training is provided to new criminal investigators, the training is inconsistent across Pakistan, and may not include information on child labor, child trafficking, or sexual exploitation of children. (2) The government did not publish data on criminal labor law enforcement in the reporting period. (2) In 2021, the Khyber Pakhtunkhwa region

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opened four additional child protection courts, bringing the total number of child protection courts in the province to eight. However, the courts have not prosecuted any child labor cases. (2) Additionally, there is no reciprocal mechanism between law enforcement and social services. (2)

Police corruption—particularly the taking of bribes from suspected perpetrators to ignore alleged crimes or police refusing to open investigations without bribes—continued to hamper Pakistan’s ability to address child sex trafficking and child labor. (8,31) Some police and other local officials, for instance, colluded with farm and brick kiln owners to create falsified criminal cases against individuals who attempted to escape from situations of bonded labor. (8) In Sindh, local officials perpetrated bonded labor in brick kilns with impunity. (31)

The government did not credibly act against reports of official complicity with human trafficking crimes. (31) Reports indicated that police sometimes refused to file cases of child sexual exploitation, including sex trafficking, unless the victims paid a bribe. (31) Moreover, children, parents, or family members who report child labor incidents often doubt that police will act in pursuit of justice. (22,24,39-44,45,119)

Research has 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. (9,37,31) Police sometimes acted indifferently to reports of child labor or sexual exploitation, pointing to cultural differences as a rationale for abuse. (22,45,119)

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
National Commission on the Rights of the Child*	Coordinates efforts relating to child rights, including reviewing proposed legislation, liaising with provincial commissions, recommending policy, reviewing programs, and promoting awareness of child rights, among other functions. (120)
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 24 FIA anti-trafficking units that work with provincial and district police officers to monitor and address domestic and transnational human trafficking. (31) Maintains an Integrated Border Management System to track entries and exits. (104)
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 the provinces’ proposed interventions on child and forced labor at the federal level. (121) While the Punjab commission met during the reporting period, there was no substantive progress besides agreement that enhanced coordination was necessary. (2)

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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. (107)</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. (79) Led by the province's Social Welfare and Women Development Department. (79) The Khyber Pakhtunkhwa Child Protection and Welfare Commission did not hold its quarterly meetings in 2021 and has been without a commissioner for 4 years. (1,2)</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 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. (81)</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. (106) 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. (106) The Sindh Child Protection Authority has been active in preventing underage marriages throughout Sindh. It has a helpline 1121 that receives complaints on child protection-related issues and refers the cases to relevant departments and officers. (122) The helpline has been used to track and reunite missing children with their families, in many cases at inter-provincial levels. It has also dealt with complaints about child beggary and corporal punishment. (122) The Sindh Child Protection Agency now has the authority to act on cases of rape, abduction, murder, or assault of children. (2)</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. (7) Coordinate and initiate interventions against child labor at the provincial level. (121) Each CPU is led by a Child Protection Officer and supported by social workers and psychologists; operates under the District Administrator. (37) Provincial CPUs were active in Punjab, Sindh, Balochistan, and Khyber Pakhtunkhwa, and identified and referred children in exploitative or vulnerable labor situations to NGO and government care. (31)</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. (9,123) In 2021, the board began a child begging awareness campaign. (2)</p>

* Mechanism to coordinate efforts to address child labor was created during the reporting period.

A parliamentary task force on "Uplift and Mainstreaming of Street Children and Bonded Labor" was created in 2020. However, the task force did not take significant actions in 2021. (2) Additionally, CPUs were unstaffed and non-functioning caused due to lack of funding and hiring delays in the Khyber Pakhtunkhwa Province because the Chief Child Protection Officer position has remained vacant for 4 years. (2)

The Child Protection Welfare Bureau in Punjab declared plans to establish five new CPUs at every district in the province. (2) The bureau rescued 1,054 children from begging in Punjab. (2) The Child Protection Welfare Bureau also referred 1,500 to 2,000 children for psychological counseling lasting around 15 days. It signed an MOU with Punjab Vocational Training Center to provide children with phone repair, tailoring, and cooking skills as well as electrician-related, beautician, and nursing courses. (2)

Balochistan has not instituted the remaining 33 CPUs despite passing legislation in 2016 to establish units in each district. (37,40)

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 lack of implementation of key national 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. (124) In 2021, as part of its implementation of the Khyber Pakhtunkhwa Child Labor Policy, 2018, the provincial government drafted the Khyber Pakhtunkhwa Prohibition of Employment of Children Rules, 2021. The provincial government also established a Coordination Committee on Child Labor to implement the rules of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015. (125) As directed by and authorized by the act, the Khyber Pakhtunkhwa Labor Department in 2021 conducted 9,189 inspections, carried out 48 prosecutions, and had 43 cases decided by the court, resulting in \$544 (109,500 Rupees) in fines. (125) In December 2021, the Khyber Pakhtunkhwa Home Department issued a notification regarding the establishment of District Vigilance Committees in each district of the province. In 2021, the provincial Labor Department created seven Child & Bonded Labor Units for the purpose of both conducting inspections and building awareness among workers and employers regarding child labor issues. (125)
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. (126) During the reporting period, the Punjab Labor Policy incorporated previously independent working and monitoring groups under the policy program. The monitoring and working groups consists of members of government, policy, and civil society and are responsible for carrying out inspections, victim identification, and treatment of survivors under the new guidance. (122) The working groups are also mandated to detect child labor, bonded labor at brick kilns, domestic violence, and related matters in their respective districts. The working groups have so far helped provide temporary shelter and legal services, when necessary, to the victims, and helped prosecutors register cases. (122)
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. (127) The Sindh Province Labor Department is undertaking a child labor survey to determine the number child laborers in Sindh province. The survey is part of Sindh Provincial efforts to address the child labor problem and implement relevant laws, including laws on the prohibition of children in hazardous work. (122)

Both the federal and provincial governments have education policies and sector plans. Although the Pakistan Education Policy 2017 (draft) and National Education Policy Framework 2018 (draft) recognize the role of child labor in limiting student enrollment and present strategies to reach out of school children and disadvantaged groups, including children who have dropped out of school to work, they do not offer child labor elimination and prevention strategies. (122)

The former Pakistan Tehreek-e-Insaf-led Punjab government announced a 5-year education policy, “The New Deal 2018-2023,” to transform school education and focus on improving learning, access, retention, equity, and government; the policy does not mention explicitly the elimination or prevention of child labor. (122) There are no education policies in Sindh and Balochistan that target specifically the elimination or prevention of child labor. (122)

VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2021, 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 inadequacy 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. (128,129) As of 2021, there were 159 Pakistan Bait-ul-Mal School for Rehabilitation of Child Labour centers in Pakistan and around 17,000 students are enrolled in primary education. (130) During the reporting period, the Punjab Bait-ul-Mal program, along with the Al-Khidmat Foundation, distributed 50 sewing machines, 30 wheelchairs, 20 white canes and rickshaws. (94)

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

Program	Description
Hotlines and Institutes†	The Ministry of Human Rights (MHR) operates a helpline for reporting human rights violations, including child labor violations, and for providing referrals to legal aid and a network of NGOs to survivors of human rights abuses. (8,104) FIA also operates a 24/7 hotline to address human trafficking, including child trafficking, in Pakistan at the headquarters, ICT, and district levels. (10,104) In 2021, MHR helped establish a Child Protection Institute in ICT under the Islamabad Territory Child Protection Act 2018, which would provide services to at-risk and vulnerable children. The program would provide rehabilitation, rescue, shelter, counseling, and help with family tracing services for children who are survivors of trafficking and forced labor. (2,131) Similarly in October 2021, the Chief Minister of Punjab inaugurated a new Child Protection Institute in Punjab. Child Protection Institutes (CPI) were working in Lahore, Gujranwala, Multan, Rawalpindi, Faisalabad, Rahim Yar Khan, Bahawalpur, and Sialkot, with two referring units in Sahiwal and Kasur. The Punjab minister also recently inaugurated a new CPI in Faisalabad. (2) During the reporting period, MHR established the Zainab Alert Response and Recovery Agency under the Zainab Alert, Response and Recovery Act in March 2020. In October 2020, MHR reported that the Zainab app‡, which is integrated with the district police stations across the country, helps track and trace missing children as well as streamline efforts to address child abuse cases, including child labor cases in Pakistan. (132) To date, it had received 1,093 reports of child abuse and exploitation. (2)
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 broaden the knowledge base on these issues. (133) During the reporting period, the Punjab Labor Department established the Chief Minister Citizen Portal, which allowed people to file a complaint against government or local officials, including child labor complaints. (2)
ILO-Funded Projects	<p>ILO projects in Pakistan that aims to eliminate child labor by improving the capacities of the federal and provincial governments to develop strong monitoring mechanisms and strengthen data collection strategies. (134)</p> <p>The Asia Regional Child Labor Program (2019–2023), funded by the UK's Foreign Commonwealth and Development Office, aims to assist stakeholders to eliminate child labor to achieve Sustainable Development Goal 8.7 by 2025. Identified three priority sectors for conducting qualitative research and creating advocacy tools: automobiles, domestic work, and brick kilns. (135)</p> <p>The Eliminating Child Labor and Forced Labor in the Cotton, Textile and Garment Value Chains (Clear Cotton) project (2018–2022) is co-funded by EU and ILO. Focuses on the cotton production hubs of Sindh and Punjab, seeks to promote enhanced federal and provincial legislation and policies, and seeks to address the basic needs and rights of children engaged or at risk of child labor or forced labor. Focuses on the cotton growing, ginning, and spinning sectors of the cotton supply chain. (136)</p> <p>The Promoting Fundamental Principles and Rights at Work in the Cotton Supply Chain project (2017–2021) was a public-private partnership with Inditex aimed at promoting Fundamental Principles and Rights at Work (FPRW) for a sustainable cotton supply chain in Pakistan. During the reporting period, the program supported in-country seminars that sensitize the community on fundamental principles and rights at work. (137)</p> <p>The Promotion of Decent Work Opportunities for the Economic Empowerment of Vulnerable Segments of Society project (2019–2021) was funded by the Italian Ministry of Foreign Affairs and International Cooperation. During the reporting period, the project organized awareness programs and workshops with stakeholders to address child labor. (138)</p>
Saboon 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. (11) During the reporting period, the program operated in the Khyber Pakhtunkhwa Province, where deradicalizing and rehabilitation was underway for youth involved in violent extremism. (94)
Loans (supported by the World Bank) to Zig-Zag Technology in Brick Kilns	Zig-zag technology reduces coal consumption and pollution from the kilns. (8) It will reduce the need for labor at each kiln, cutting incentives for bonded and child labor. (8) The Punjab government has pushed brick kilns in the province to adopt zig-zag technology. (8) By May of this reporting year, all of Punjab's brick kilns had adopted this technology, with 99 percent completion in the previous year. (122,139) The Punjab government offered subsidized loans, supported by the World Bank, to encourage adoption, and enforced its December 31 deadline for all kilns to convert to the technology or be shut down. (8) By December 2021, 20 out of 64 brick kilns in ICT had switched to the zig-zag technology. (140)

† Program is funded by the Government of Pakistan.

‡ Program launched during the reporting period.

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In 2021, the Sindh Social Welfare Department established two rehabilitation centers for street workers, vulnerable children, and those highly at risk of human trafficking. The shelter has the capacity to house 400 street children. (2) The Sindh government has allocated \$250,000 for the project, which includes providing access to education to youth who are vulnerable to child trafficking. (2) One shelter was completed in February 2021, and the other is expected to open in 2022. (2)

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. (37,104) The Khyber Pakhtunkhwa labor department began conducting its child labor survey in 2019. (37,104) Child labor surveys are also being carried out in Sindh and the ICT, and Balochistan. Gilgit- Baltistan completed its survey in 2021, and Punjab is in the final stages of the report, whereas Khyber Pakhtunkhwa is expected to reveal its finding in early 2022. (2,141) Surveys are expected to be completed in 2022 due to pandemic-related delays. (1)

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 do not provide sufficient protection and rehabilitation services for bonded child laborers and child survivors of human trafficking. (40,142) Government initiatives do not specifically target child labor in the informal sector, including child labor and forced child labor in domestic work. (2) In addition, there is no significant social program to address sexual abuse of child workers or children attending *madrassas* in Pakistan. Social Welfare Departments in all provinces are responsible for providing shelter and rehabilitation to distressed children. (122)

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 – 2021
	Establish a minimum age for work of at least age 14 in federal and provincial laws extending to all sectors and informal employment, regardless of the number of employees.	2011 – 2021
	Ensure that the law prohibits the employment of children under age 18 in hazardous work such as brickmaking, mining, and domestic service, including in federal law and Balochistan Province.	2009 – 2021
	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 – 2021
	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 Khyber Pakhtunkhwa Province.	2015 – 2021
	Raise the minimum age for work to the age up to which education is compulsory.	2019 – 2021
Enforcement	Ensure that the number of labor inspectors in Pakistan meets the ILO's technical advice and that there are a sufficient number of inspectors trained and responsible for providing enforcement of child labor laws in all provinces.	2016 – 2021
	Provide the funding necessary to adequately hire, consistently train, equip, and cover the cost of transportation for inspectors to enforce child labor laws across Pakistan, especially in Khyber Pakhtunkhwa, Punjab, and Sindh Provinces.	2010 – 2021
	Ensure that District Vigilance Committees are operating effectively in all provinces, including through public outreach and in the reporting and filing of cases.	2013 – 2021
	Ensure that all allegations of trafficking into <i>bacha bazi</i> are thoroughly investigated and, when appropriate, prosecuted.	2019 – 2021
Enforcement	Ensure that farms and brick kilns do not employ child labor; fully compensate all workers, and labor laws are adequately enforced.	2020 – 2021
	Ensure that the recommendation by the Islamabad Capital Territory brick kilns commission is implemented, including execution of employment contracts for all workers, and issuing national identity cards to all workers and their children.	2021

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

Area	Suggested Action	Year(s) Suggested
Enforcement	Ensure that the order by the Islamabad High Court to eradicate bonded labor from all brick kiln in the Islamabad Capital Territory is enforced.	2021
	Ensure the government has the proper oversight to remove children from exploitative situations.	2021
	Ensure that inspectors are fully executing Sindh Province's Labor Policy, including by providing sufficient resources and unimpeded access to brick kilns to conduct inspections.	2021
	Create a centralized repository of labor law enforcement data and a regular mechanism for reporting them to the federal government, and make the data publicly available.	2018 – 2021
	Publish enforcement data on labor inspectorate funding, the number of labor inspectors, mechanisms to assess civil penalties, training for new labor inspectors, refresher courses provided, labor inspections conducted, child labor law violations, penalties imposed and collected, whether routine inspections were targeted, whether unannounced inspections are conducted, and whether reciprocal referral mechanisms exist between labor authorities and social services for all provinces.	2010 – 2021
	Establish sufficient laws to end police corruption, particularly the taking of bribes from suspected perpetrators to ignore alleged crimes.	2019 – 2021
	Establish a referral mechanism between labor authorities and social services in all provinces.	2017 – 2021
	Establish a referral mechanism between law enforcement agencies and social services in all provinces.	2018 – 2021
	Publish information about criminal law investigations, violations found, prosecutions initiated, and the number of convictions, as well as about initial training, training on the worst forms of child labor, refresher courses, and penalties imposed and collected in all provinces.	2016 – 2021
Coordination	Publish information on the activities undertaken to enhance coordination efforts by the Provincial and Federal Tripartite Consultative Committees.	2017 – 2021
	Establish the remaining 33 Child Protection Units in Balochistan, as required by law.	2019 – 2021
	Ensure that all coordinating bodies are able to carry out their intended mandates.	2020 – 2021
Government Policies	Ensure that steps are taken to effectively implement policies to address child labor.	2020 – 2021
	Integrate child labor elimination and prevention strategies in the education policies of the provincial governments.	2014 – 2021
	Publish activities undertaken to implement key policies related to child labor during the reporting period.	2020 – 2021
Social Programs	Ensure that children are protected from sexual abuse in schools, including <i>madrassas</i> , workplaces, and while scavenging on the streets.	2021
	Complete and publish child labor surveys at the federal and provincial levels.	2009 – 2021
	Improve existing programs to address the prevalence and scope of Pakistan's child labor problem, including providing enough protection and rehabilitation services for child domestic workers, bonded child laborers, child survivors of human trafficking, and other children working in the informal sector and in the worst forms of child labor.	2009 – 2021
	Implement programs to address high rates of teacher absenteeism, inadequate facilities, school fees, lack of transportation, and use of corporal punishment to ensure that all children have access to free and compulsory education, as required by law.	2011 – 2021

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