

In 2020, Pakistan made moderate advancement in efforts to eliminate the worst forms of child labor. In February, the government formally constituted and appointed members to the National Commission on the Rights of the Child, which includes two representatives who are children. Additionally, in response to the fatal beating of an 8-year-old domestic worker by her employer, the Islamabad Capital Territory cabinet banned child domestic labor under age 14 in the capital territory. The Pakistani government also added domestic labor to the list of occupations defined as hazardous work prohibited for children under the Employment of Children Act 1991. Children in Pakistan are subjected to the worst forms of child labor, including in commercial sexual exploitation and forced 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 did not publicly release information on their labor and criminal law enforcement efforts. Further, police corruption, particularly the taking of bribes from suspected perpetrators to ignore child labor crimes and lack of willingness to conduct criminal investigations, hindered Pakistan's ability to address the problem throughout the country.



I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Pakistan are subjected to the worst forms of child labor, including in commercial sexual exploitation and forced domestic work, each sometimes as a result of human trafficking. Children also engage in forced labor in brick kilns and agriculture. (1-5) 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.

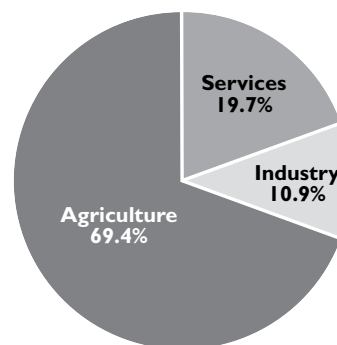
Table I. Statistics on Children's Work and Education

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		73.3
	Punjab Province		Unavailable
	Sindh Province		Unavailable

Source for primary completion rate: Data from 2019, published by the UNESCO Institute for Statistics, 2021. (6)

Source for all other data: International Labor Organization's analysis of statistics from Labour Force Survey (LFS), 2017–2018; and Multiple Indicator Cluster Survey 5 (MICS 5), 2014. (7)

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 (3,5,8,9)
	Fishing, including deep sea fishing (10,11)
Industry	Manufacturing glass bangles,† surgical instruments,† and jewelry (3-5,9,10,12-15)
	Weaving carpets,† producing garments, and tanning leather† (3,10,13,15,18-21)
	Producing bricks (1,3-5,15,19-24)
	Mining coal† and gemstones, and crushing stone† (10,19,22,25-27)
Services	Domestic work (2,4,5,28,29)
	Working in hotels, restaurants, gas stations, and automobile repair (3-5,19,21,30-33)
	Scavenging† and sorting garbage and recyclables, begging, and street vending (3,5,21,30,34-36)
Categorical Worst Forms of Child Labor‡	Forced labor in agriculture, brickmaking, carpet weaving, and coal mining (1,3,5,37-39)
	Forced domestic work, sometimes as a result of human trafficking (2,3,28,39)
	Commercial sexual exploitation, including use in the production of pornography, sometimes as a result of human trafficking (3-5,15,39-43)
	Forced begging, sometimes as a result of human trafficking (3,39)
	Recruitment of children by non-state armed groups for use in armed conflict (39)
	Use in illicit activities, including the trafficking and production of drugs (3,5,21,36)

† 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. (44) When available, data and information are included for the federal and provincial governments in this report. In 2020, 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. (5,28) Due to delays related to the COVID-19 pandemic, these surveys are not expected to be completed before 2022. (5)

Many child domestic workers work under conditions of forced labor, including debt bondage, sexual assault, and extreme physical abuse. (2,3,28,29) 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. Children are also kidnapped or sold into organized begging rings, domestic servitude, gangs, and child sex trafficking. (44,45) Reports estimate that around 70 percent of bonded laborers in Pakistan are children. (44,46) Some children work with their families as bonded laborers in the production of bricks. (3,4,24,38,39) Begging ringmasters sometimes maim children to earn more money or force children to steal, and organized criminal groups force children into drug trafficking in Sindh and Balochistan. 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. (3,39,44)

Research found that in Sindh, Punjab, and Balochistan, agriculture, brick kiln, fisheries, poultry, mining, construction, domestic labor, and carpet making industries oftentimes 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. (47) Afghan, Iranian, and Pakistani children, particularly from Dalbadin and Quetta in Balochistan, are used in drug trafficking operations across the Iranian and Afghan borders with Balochistan, and in parts of Karachi. Children are also used in smuggling operations along the Afghan border with Khyber Pakhtunkhwa. (47)

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); and gender (women, including transgender women, are particularly vulnerable to sex trafficking). (47)




Child laborers in Pakistan, particularly boys, are frequently subjected to commercial sexual exploitation at their places of employment, including in factories, workshops, mines, or while scavenging on the streets. (48) They are also sometimes subjected to sexual exploitation in order to obtain or keep their jobs or accommodations. (39,48) Research indicates that in Kasur, a city in 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. (3,48,49) The practice of *bacha bazi*, in which boys are forced to provide social and sexual entertainment for older men, is a form of commercial sexual exploitation. Traffickers in Pakistan also promise Pakistani boys admission to Afghan religious schools only to sell them to Afghan security forces for the purpose of sexual exploitation. (39,50)

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. (49,51,52) There are more than 22,000 registered *madrassas* in the country, and 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. (49,51) In addition, non-state armed militant groups—Tehreek-e-Taliban Pakistan, its splinter groups, and ISIL-KP (ISIL Khorasan Province)—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. (3,9,15,39,44,45,53-58) The government operated a center in Swat, Khyber Pakhtunkhwa, to rehabilitate, educate, and reintegrate former child soldiers. (45) 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. (3,9,54,57,59,60) 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 to present their birth certificate to enroll. (3,44) Only 31 percent of births in Pakistan 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. (61)

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.

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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 (62-65)
	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 (62-65)
	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 (66-68)
	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 (69-71)
	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 (72-74)
Minimum Age for Hazardous Work	Federal	No	14	Sections 2–3 of the Employment of Children Act (75)
	Balochistan	No	14	Sections 2–3 of the Employment of Children Act (75)
	Khyber Pakhtunkhwa	Yes	18	Sections 2(1)(a) and 3(2) of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (66)
	Punjab	Yes	18	Section 3(2) of the Punjab Restriction on Employment of Children Ordinance (70)
	Sindh	Yes	18	Section 3(2) of the Sindh Prohibition of Employment of Children Act (74)
Identification of Hazardous Occupations or Activities Prohibited for Children	Federal	Yes		Parts 1–2 of the Schedule of the Employment of Children Act (75)
	Balochistan	Yes		Parts 1–2 of the Schedule of the Employment of Children Act (75)
	Khyber Pakhtunkhwa	Yes		Parts 1–2 of the Schedule of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (66)
	Punjab	Yes		Schedule of Hazardous Work of the Punjab Restriction on Employment of Children Ordinance (70)
	Sindh	Yes		Schedule of Hazardous Work of the Sindh Prohibition of Employment of Children Act (74)
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 (76-78)
	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 (76-78)
	Khyber Pakhtunkhwa	Yes		Sections 2(j) and 3 of the Khyber Pakhtunkhwa Bonded Labor System (Abolition) Act (79)
	Punjab	Yes		Section 11(3) of the Punjab Restriction on Employment of Children Ordinance; Section 4 of the Punjab Bonded Labor System (Abolition) Act (70,80)
	Sindh	Yes		Section 4 of the Sindh Bonded Labor System (Abolition) Act (81)
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) and 3 of the Prevention and Control of Human Trafficking Ordinance (77,78,82)
	Balochistan	No		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A–366B of the Penal Code; Sections 2(g) and 3 of the Prevention and Control of Human Trafficking Ordinance (77,78,82)
	Khyber Pakhtunkhwa	No		Sections 2 and 52 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (83)
	Punjab	No		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A–366B of the Penal Code; Sections 2(g) and 3 of the Prevention and Control of Human Trafficking Ordinance (77,78,82)
	Sindh	No		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A–366B of the Penal Code; Sections 2(g) and 3 of the Prevention and Control of Human Trafficking Ordinance (77,78,82)

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

Standard	Related Entity	Meets International Standards	Age	Legislation
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; Sections 377A and 292B of the Second Amendment to the Criminal Code (2016) (77,78,84)
	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) (77,78,84)
	Khyber Pakhtunkhwa	No		Sections 2, 48, and 53 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (83)
	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 (70,85)
	Sindh	Yes		Section 14.1(b) of the Sindh Prohibition of Employment of Children Act (74)
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 (83)
	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 (70,85)
	Sindh	Yes		Section 14.1(c) of the Prohibition of Employment of Children Act (74)
Minimum Age for Voluntary State Military Recruitment	Federal	Yes	18	Section 3 of the National Service Ordinance (86)
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 (70)
	Sindh	Yes		Section 14.1(c) of the Prohibition of Employment of Children Act (74)
Compulsory Education Age	Federal	Yes	16	Section 3 of the Right to Free and Compulsory Education Act (87)
	Balochistan	Yes	16	Section 3 of the Balochistan Compulsory Education Act (88)
	Khyber Pakhtunkhwa	Yes	16	Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (89)
	Punjab	Yes	16	The Punjab Free and Compulsory Education Ordinance (90)
	Sindh	Yes	16	Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (91)
Free Public Education	Federal	Yes		Section 3 of the Right to Free and Compulsory Education Act (87)
	Balochistan	Yes		Section 2(f) of the Balochistan Compulsory Education Act (88)
	Khyber Pakhtunkhwa	Yes		Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (89)
	Punjab	Yes		The Punjab Free and Compulsory Education Act (90)
	Sindh	Yes		Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (91)

* No conscription (86)

† 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. (62-64)

‡ The minimum age for work in brick kilns is 14 years old. The minimum age for work in domestic work is 15 years old. (69,71)

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The Eighteenth Amendment to the Pakistani Constitution permits provinces to pass laws that govern labor law and children's welfare. (92,93) Federal law applies only until the province passes a law on the same subject. (28,92)

In response to an employer's fatal beating of an 8-year-old girl she was illegally employing as a domestic worker, the ICT cabinet banned child domestic labor in the capital territory – the government added child domestic labor to the list of occupations defined as hazardous work prohibited for children under the Employment of Children Act 1991. (5,47,94,95, 145) In 2019, the Pakistan National Assembly passed the ICT 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 yet approved the bill at the close of the reporting period. (3,96)

In 2020, the Balochistan provincial cabinet approved legislation aimed at protecting laborers, particularly children, through the Elimination of Bonded Labor and Rehabilitation of Victims of Bonded Labor Bill 2020. (5) In addition, in September 2020, Balochistan's cabinet approved the Balochistan Employment of Children Prohibition and Regulation Bill 2021, which would set the minimum age for hazardous work at age 18, would allow for light work for children ages 12 to 14, and also would prohibit the work of children under the age of 18 in mines. (97-99) However, this bill does not list the activities in which light work may be permitted, nor does it specify the conditions in which light work may be undertaken or limit the number of hours for light work. Neither of these bills had been enacted as law at the close of the reporting period.

On January 12, 2021, the Pakistani Government approved implementation rules for the Prevention of Trafficking in Persons Act and the Prevention of Smuggling of Migrants Act, which were signed into law in 2018. Among other things, the statutes do not require proof of force, fraud, or coercion in the case of sex trafficking for minors. (47,78)

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. (62-66,68-74) The federal government's minimum age for hazardous work is currently age 14, which does not comply with international standards. (75) The federal minimum age for hazardous work still applies in Balochistan Province, as Balochistan has not established a minimum age for hazardous work. (28,75,100)

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. (19,54,94,101) 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. (25,26,64,66,69,74,96,100)

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. (77,78,82) Khyber Pakhtunkhwa Province's human trafficking law also requires the additional element of kidnapping, coercion, or receipt or giving of a benefit. (83)

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. (77,78,83,84) 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. (70,74,83) 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. (11,66,70)

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. (66,87-91)

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. (11,102)
Provincial Labor Inspectors	Inspect industrial areas and markets to identify child labor violations, enforce provincial labor laws, and pursue legal action against employers. (11)
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. (3,4,9,39) Operates under the Ministry of Interior. (4) In 2020, the FIA transitioned from a paper-based system to a computerized case management system, allowing efficiencies in data collection and information sharing. (47)
Labor Courts	Assess penalties for labor violations. Located in each province and the Islamabad Capital Territory (ICT). (3,44,103-105)
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. (11,39,44,76) Exist in Punjab, Sindh, and the ICT, but not in Balochistan and Khyber Pakhtunkhwa Provinces. (44)
Child Protection Units (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. (83,85,106-109)

District Vigilance Committees (DVCs) are functioning in all of Punjab Province's 36 districts (conducting 259 meetings during the reporting period), and in 29 districts in Sindh Province (only 9 DVCs convened and none met regularly). (39,44,106) 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 victims who came forward often faced retaliation from their exploitative employers. (39)

In August 2020, Khyber Pakhtunkhwa opened the first child protection court of the newly merged districts of the former Federally Administered Tribal Area, bringing the province's total to four. These courts specifically address crimes against children, including abuse, neglect, and exploitation. (47)

Labor Law Enforcement

In 2020, labor law enforcement agencies in Pakistan took actions to combat child labor (Table 6). However, gaps exist within the operations of the provincial labor departments that may hinder adequate labor law enforcement, including authority to assess penalties.

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Table 6. Labor Law Enforcement Efforts Related to Child Labor

Overview of Labor Law Enforcement	Related Entity	2019	2020
Labor Inspectorate Funding		Unknown (3)	Unknown (5)
Number of Labor Inspectors	Federal	Unknown (3)	Unknown (5)
	Balochistan	Unknown (3)	59 (5)
	Khyber Pakhtunkhwa	Unknown (3)	Unknown (5)
	Punjab	80 (3)	102 (110)
	Sindh	120 (3)	120 (5)
Inspectorate Authorized to Assess Penalties	Federal	Unknown	Unknown
	Balochistan	Yes (3)	Yes (5)
	Khyber Pakhtunkhwa	Yes (3)	Yes (5)
	Punjab	Yes (3)	Yes (5)
	Sindh	Yes (3)	Yes (5)
Initial Training for New Labor Inspectors	Federal	Unknown (3)	Yes (5)
	Balochistan	No (3)	Yes (5)
	Khyber Pakhtunkhwa	No (3)	Yes (5)
	Punjab	Yes (3)	Yes (5)
	Sindh	Yes (3)	Yes (5)
Training on New Laws Related to Child Labor	Federal	Yes (3)	N/A
Training on New Laws Related to Child Labor	Balochistan	Unknown	Unknown
Training on New Laws Related to Child Labor	Khyber Pakhtunkhwa	Unknown	N/A
Training on New Laws Related to Child Labor	Punjab	Yes (3)	N/A
Training on New Laws Related to Child Labor	Sindh	Unknown	Unknown
Refresher Courses Provided	Federal	Yes (3)	Unknown (5)
Refresher Courses Provided	Balochistan	Unknown	Unknown
Refresher Courses Provided	Khyber Pakhtunkhwa	Unknown	Unknown (5)
Refresher Courses Provided	Punjab	Yes (44)	Unknown (5)
Refresher Courses Provided	Sindh	Unknown	Unknown
Number of Labor Inspections Conducted	Federal	Unknown (3)	Unknown (5)
	Balochistan	Unknown (3)	Unknown (5)
	Khyber Pakhtunkhwa	Unknown (3)	Unknown (5)
	Punjab	Unknown (3)	29,289 (5)
	Sindh	Unknown (3)	Unknown (5)
Number Conducted at Worksites	Federal	Unknown	Unknown
Number Conducted at Worksites	Balochistan	Unknown	Unknown
Number Conducted at Worksites	Khyber Pakhtunkhwa	Unknown (3)	Unknown (5)
Number Conducted at Worksites	Punjab	Unknown (3)	Unknown (5)
Number Conducted at Worksites	Sindh	Unknown	Unknown
Number of Child Labor Violations Found	Federal	Unknown (3)	Unknown (5)
	Balochistan	Unknown	Unknown
	Khyber Pakhtunkhwa	Unknown (3)	Unknown (5)
	Punjab	940 (44)	1,771 (5)
	Sindh	Unknown (3)	Unknown (5)
Number of Child Labor Violations for Which Penalties Were Imposed	Federal	Unknown (3)	Unknown (5)
Number of Child Labor Violations for Which Penalties Were Imposed	Balochistan	Unknown	Unknown
Number of Child Labor Violations for Which Penalties Were Imposed	Khyber Pakhtunkhwa	Unknown (3)	Unknown (5)
Number of Child Labor Violations for Which Penalties Were Imposed	Punjab	Unknown (3)	Unknown (5)
Number of Child Labor Violations for Which Penalties Were Imposed	Sindh	Unknown	Unknown
Number of Child Labor Penalties Imposed that Were Collected	Federal	Unknown	Unknown
Number of Child Labor Penalties Imposed that Were Collected	Balochistan	Unknown	Unknown
Number of Child Labor Penalties Imposed that Were Collected	Khyber Pakhtunkhwa	Unknown (3)	Unknown (5)
Number of Child Labor Penalties Imposed that Were Collected	Punjab	Unknown (3)	Unknown (5)
Number of Child Labor Penalties Imposed that Were Collected	Sindh	Unknown	Unknown

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

Overview of Labor Law Enforcement	Related Entity	2019	2020
Routine Inspections Conducted	Federal	Unknown	Unknown (5)
	Balochistan	Yes (3)	Yes (5)
	Khyber Pakhtunkhwa	Yes (3)	Yes (5)
	Punjab	Yes (3)	Yes (5)
	Sindh	Yes (3)	Yes (5)
Routine Inspections Targeted	Federal	Unknown	Unknown
Routine Inspections Targeted	Balochistan	Unknown	Unknown
Routine Inspections Targeted	Khyber Pakhtunkhwa	Unknown	Unknown (5)
Routine Inspections Targeted	Punjab	Unknown	Yes (5)
Routine Inspections Targeted	Sindh	Unknown	Unknown
Unannounced Inspections Permitted	Federal	Yes (3)	Yes (5)
	Balochistan	Yes (3)	Yes (5)
	Khyber Pakhtunkhwa	Yes (3)	Yes (5)
	Punjab	Yes (3)	Yes (5)
	Sindh	Yes (3)	Yes (5)
Unannounced Inspections Conducted	Federal	Unknown	Unknown
Unannounced Inspections Conducted	Balochistan	Unknown	Unknown
Unannounced Inspections Conducted	Khyber Pakhtunkhwa	Unknown	Unknown (5)
Unannounced Inspections Conducted	Punjab	Unknown	Yes (5)
Unannounced Inspections Conducted	Sindh	Unknown	Unknown (5)
Complaint Mechanism Exists	Federal	Unknown	Unknown
	Balochistan	Yes (3)	Yes (5)
	Khyber Pakhtunkhwa	Yes (3)	Yes (5)
	Punjab	Yes (3)	Yes (5)
	Sindh	Yes (3)	Yes (5)
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Federal	Unknown	Unknown
	Balochistan	Unknown	Unknown
	Khyber Pakhtunkhwa	No (3)	No (5)
	Punjab	No (3)	No (5)
	Sindh	Unknown	Unknown

Pakistan's provinces are responsible for enforcing labor laws, including those relevant to child labor law. (11) 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. (9) While 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 4,259 labor inspectors as its workforce consists of over 64 million workers. (116-118)

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. (3,9) 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. (3,19,102,119,120) In addition, labor inspectorates sometimes failed to conduct inspections of 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. (27) Also, labor inspectors in Punjab reportedly do not inspect private farms owned by influential landlords for child or bonded labor. (47)

In February 2020, the Lahore High Court directed the Punjab Labor Department to ensure within 6 months registration of all brick kilns under the Factories Act (1934), and thereby increase government visibility over brick kilns to curb bonded and child labor—specifically, the court ordered the labor department to ensure that

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no kilns had child workers under the age of 14, every worker had a written contract, employers kept detailed registers of advances, and regularly paid into workers' social security funds, as federally mandated. (39,47) In response, the Punjab Labor Department conducted a census of brick kilns in the province and the results are publicly available through an online portal. (47) Research has found that a series of surprise brick kiln inspections conducted by Punjabi labor authorities in 2020 resulted in prosecutions of 3,953 brick kilns for bonded labor violations, with Punjab labor inspectors filing First Information Reports (FIRs) against 23 employers for child labor and minimum wage violations (indicators of bonded labor). (39,47) Research has also found that many violators received fines, and their kilns were permitted to re-open following payment of the fines. Some kiln owners allegedly avoided prosecution by bribing the inspectors; other cases remain pending in the court system. (121)

However, a majority of the estimated 18,000 kilns in Pakistan continued to operate without registration and required benefits for workers, particularly those ages 14 to 18. (39)

Criminal Law Enforcement

In 2020, 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	2019	2020
Initial Training for New Criminal Investigators	Yes (3)	Unknown (5)
Training on New Laws Related to the Worst Forms of Child Labor	Unknown (3)	Unknown (5)
Refresher Courses Provided	Unknown (3)	Unknown (5)
Number of Investigations	Unknown (3)	Unknown (5)
Number of Violations Found	Unknown (3)	Unknown (5)
Number of Prosecutions Initiated	Unknown (3)	Unknown (5)
Number of Convictions	Unknown (3)	Unknown (5)
Imposed Penalties for Violations Related to the Worst Forms of Child Labor	Unknown (3)	Unknown (5)
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	No (3)	No (5)

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 2020. (5) 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)

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 eliminate child labor, especially in the brick kiln industry, coal mining, factories, street scavenging, and cases related to the sexual abuse of children in *madrassas*. 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. (47) In addition, children, parents, or family members who report child labor incidents often lack faith that police will act in pursuit of justice. (24,27,39,48,49,51,122) Police sometimes acted indifferently to reports of child labor or sexual exploitation, pointing to cultural differences as a rationale for abuse. Further, some police reportedly fear being accused of blasphemy by religious clerics if they take action against the sexual abuse of children in *madrassas*. (24,51,122)

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 (NCRC)*	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. (123) In February 2020, the NCRC was formally constituted and its members appointed. (5) In addition to representatives from the provinces, includes two children as members. (123)
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. (124) Maintains an Integrated Border Management System to track entries and exits. (3,106) Research has found that the Inter-Agency Task Force members' interceptions of suspected migrants and trafficked persons decreased during the reporting period. (47)
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. (125) While the Punjab commission met during the reporting period, research was unable to determine whether any substantive progress was made towards enhancing coordination. (5)
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. (109)</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. (83) Led by the province's Social Welfare, Special Education and Women Empowerment Department. (126) The Khyber Pakhtunkhwa Child Protection and Welfare Commission did not hold its quarterly meetings in 2020 and has been without a commissioner for 3 years. (5)</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. (85) During the reporting period, the Punjab Child Protection and Welfare Bureau operated open reception centers to identify and register children living on the street, and identified and assisted 8,114 children. (39)</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. (108) 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. (121) 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. (121) The Sindh Child Protection Authority also conducted online trainings for child counselors. Other sessions and trainings have been conducted on raising awareness on child rights related laws across Sindh. (121)</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. Coordinate and initiate interventions against child labor at the provincial level. (125) Each CPU is led by a Child Protection Officer and supported by social workers and psychologists; operates under the District Administrator. (44) 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. (39) Khyber Pakhtunkhwa established 2 new CPUs during the reporting period, for a total of 14. With an international organization, Balochistan established its first CPU during the reporting period. (39)</p>
Child Protection Advisory Board	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. (3,127) In 2020, the Child Protection Advisory board launched an awareness campaign on child begging and held a meeting in September. (5,128,129)

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

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In 2020, the National Assembly constituted the Uplift and Mainstreaming of Street Children and Bonded Labor Task Force, which will discuss ways to remove children from street work and bonded labor and provide them with education and health services. (5) Khyber Pakhtunkhwa has 12 Child Protection Units (CPUs); however, none was active during the reporting period due to a lack of finances and child protection officers. Balochistan established 1 CPU in Quetta; however, they have not yet instituted the remaining 33 CPUs despite passing legislation in 2016 to establish units in each district. (39,44,47)

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 implementation.

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. (130) Research was unable to determine whether activities were undertaken to implement the Khyber Pakhtunkhwa Labor Policy during the reporting period.
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. (131) Research was unable to determine whether activities were undertaken to implement the Punjab Labor Policy during the reporting period.
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. (132) In the past, 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) Research was unable to determine whether activities were undertaken to implement the Sindh Labor Policy during the reporting period.

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. (133-136)

VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2020, 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. (137,138) In October 2020, Pakistan Bait-ul-Mal signed a Memorandum of Understanding with United Bank Limited to start making digital payments to project participants through an electronic biometric verification system. (139)
Hotlines	FIA operates a 24/7 hotline to combat human trafficking, including child trafficking, in Pakistan at the headquarters, ICT, and district levels. (4,106) The Ministry of Human Rights also 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 victims of human rights abuses. (47,106) In 2020, the Ministry of Human Rights launched a helpline smartphone app, and actively promoted it on social media and traditional media. (47) The Punjab Child Protection and Welfare Bureau and Sindh Social Welfare Department operate helplines for children subjected to exploitation, violence, abuse, and neglect. The Sindh Social Welfare Department operates a 24-hour helpline for child protection. (47)

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

Program	Description
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. (140-142) Research has found that no progress was made during the reporting period to implement this project. (121)
ILO-Funded Projects	<p>ILO projects in Pakistan that aim to eliminate child labor by improving the capacities of the federal and provincial governments to develop strong monitoring mechanisms and strengthen data collection strategies.</p> <p>The Asia Regional Child Labor (ARCL) 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 (SDG) 8.7 by 2025. Identified three priority sectors for conducting qualitative research and creating advocacy tools: automobiles, domestic work, and brick kilns. During the reporting period, the ARCL Program was in its inception phase, conducting planning activities and consultative sessions with relevant stakeholders. (99)</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 the EU. It focuses on the cotton production hubs of Sindh and Punjab, seeks to promote enhanced federal and provincial legislation and policies, and 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. In 2020, the project conducted a rapid assessment of the ginning and spinning sectors. (99) In addition, it developed a toolkit and awareness and training materials regarding childhood exposure to pesticides and occupational safety and health issues. The project also developed training materials for inspectors at the district level and conducted community-based monitoring and remediation initiatives through video conference. (99)</p> <p>The Promoting Fundamental Principles and Rights at Work in the Cotton Supply Chain project (2017–2021) is a public-private partnership with Inditex aimed at promoting Fundamental Principles and Rights at Work (FPRW) for a sustainable cotton supply chain in Pakistan. In 2020, the project drafted a mapping study of the cotton supply chain in selected communities. It also developed and distributed informational and communication materials to relevant stakeholders and farming communities. (99) Since its inception, the project has reached an estimated 1,860 direct project participants and about 5,000 indirect project participants. (99)</p> <p>The Promotion of Decent Work Opportunities for the Economic Empowerment of Vulnerable Segments of Society project (2019–2021) is funded by the Italian Ministry of Foreign Affairs and International Cooperation, and is focused on the brick kiln industry. During the reporting period, the project conducted awareness-raising activities on the COVID-19 pandemic with brick kiln owners and workers, undertook a rapid assessment on the impact of the pandemic on Pakistan's brick kiln sector, and conducted a study of the brick kiln sector to identify deficits on FPRW with respect to child labor and bonded labor. (99)</p>
Khidmat ATM Cards†	Government-funded program to increase enrollment in schools that focuses on low income families in Punjab. (121) Provides approximately \$12.50 to families for every child enrolled in school and thereafter approximately \$6.25 per month for every child whose school attendance has been verified. (101) Active in 2020. (5)
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. (9) In 2020, the Khyber Pakhtunkhwa provincial government approved funding for a second Sabaoon Center called Sabaoon-II. (143)
Loans (supported by the World Bank) to Zig-Zag Technology in Brick Kilns	The Punjab government has pushed brick kilns in the province to adopt "zig-zag" technology, which, in addition to reducing coal consumption and pollution from the kilns, will reduce the need for labor at each kiln, cutting incentives for bonded and child labor. (47) Approximately 99 percent of Punjab's kilns have adopted this technology, with many doing so during this reporting period. (121) 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. (47)

† 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 in 2019. (44,106) 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. (101) Surveys are expected to be completed in 2022 due to pandemic-related delays. (5)

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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 child victims of human trafficking. (39,144) Government initiatives are needed to specifically target child labor in the informal sector, including child labor and forced child labor in domestic work. (120) In addition, there is no significant social program to address sexual abuse of child workers or children attending *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 – 2020
	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 – 2020
	Ensure that the law prohibits the employment of children under age 18 in hazardous work, including in federal law and Balochistan Province.	2009 – 2020
	Ensure that the federal and provincial lists of hazardous work prohibited for children are comprehensive, and include brickmaking, domestic work, and mining.	2009 – 2020
	Ensure that federal and provincial laws criminally prohibit child trafficking without requiring an element of force, fraud, or coercion.	2019 – 2020
	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 – 2020
	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 – 2020
	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 – 2020
	Raise the minimum age for work to the age up to which education is compulsory.	2019 – 2020
	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.
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 – 2020
Ensure that District Vigilance Committees that seek to ensure enforcement and implementation of bonded labor prohibitions are operating effectively in all provinces, and are established in Khyber Pakhtunkhwa and Balochistan Provinces.		2013 – 2020
Ensure that all allegations of sexual abuse, including allegations of <i>bacha bazi</i> and trafficking of boys into Afghanistan, are thoroughly investigated and, when appropriate, prosecuted.		2019 – 2020
Ensure that all brick kilns are registered, do not employ child labor, and fully compensate all workers.		2020
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 – 2020
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, whether unannounced inspections were conducted, whether training on new laws related to child labor were conducted, whether refresher training courses were provided, whether complaint mechanisms exist, whether reciprocal referral mechanisms exist between labor authorities and social services for all provinces.		2010 – 2020
Establish sufficient laws to end police corruption, particularly the taking of bribes from suspected perpetrators to ignore alleged crimes.		2019 – 2020

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

Area	Suggested Action	Year(s) Suggested
Enforcement	Establish a referral mechanism between labor authorities and social services in all provinces.	2017 – 2020
	Establish a referral mechanism between criminal law enforcement agencies and social services in all provinces.	2018 – 2020
	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 – 2020
Coordination	Publish information on the activities undertaken by the Provincial and Federal Tripartite Consultative Committees.	2017 – 2020
	Establish the remaining 33 Child Protection Units in Balochistan, as required by law.	2019 – 2020
	Ensure that the Khyber Pakhtunkhwa Child Welfare and Protection Commission meets regularly and appoints a commissioner.	2020
	Ensure all coordinating bodies are able to carry out their intended mandates.	2020
Government Policies	Ensure that steps are taken to implement policies to address child labor.	2020
	Ensure that inspectors are provided with sufficient resources and are not stymied from executing Sindh Province's Labor Policy by factory owners.	2019 – 2020
	Integrate child labor elimination and prevention strategies in the education policies of the provincial governments.	2014 – 2020
	Publish activities undertaken to implement key policies related to child labor during the reporting period.	2020
Social Programs	Complete and publish child labor surveys at the federal and provincial levels.	2009 – 2020
	Implement programs to address and eliminate the sexual abuse of children, especially in <i>madrassas</i> , workplaces, and on the street.	2019 – 2020
	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 – 2020
	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. Increase security for schools to protect children and teachers from attacks by non-state armed groups.	2011 – 2020
	Implement programs to raise awareness of and provide assistance to children used by non-state militant groups to engage in armed conflict.	2011 – 2020

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