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In 2017, Pakistan made a moderate advancement in efforts to eliminate the worst forms of child labor. Sindh Province passed the Prohibition of Employment of Children, which establishes age 15 as the minimum age for employment and age 19 as the minimum age for employment in hazardous work. Khyber Pakhtunkhwa Province also passed the Free Compulsory Primary and Secondary Education Act, making education free and compulsory for children ages 5 to 16. In addition, four provinces allocated funds to conduct child labor surveys, using the ILO-UNICEF Statistical Information and Monitoring Program on Child Labor methodology. However, children in Pakistan engage in the worst forms of child labor, including in forced domestic work and in bonded labor in brick kilns. Balochistan Province has not established a minimum age for work or hazardous work in compliance with international standards. In addition, provincial governments do not have the resources necessary to adequately enforce laws prohibiting child labor.



I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Pakistan engage in the worst forms of child labor, including in forced domestic work and in bonded labor in brick kilns. (1; 2) Table 1 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 1. Statistics on Children's Work and Education

Children	Age	Percent		
		All Pakistan	Punjab Province	Sindh Province
Working (% and population)	5 to 14	Unavailable	12.4	31.5
Attending School (%)	5 to 14	Unavailable	77.1	60.6
Combining work and school (%)	7 to 14	Unavailable	8.2	11.6
Primary completion rate (%)		73.7	Unavailable	Unavailable

Source for primary completion rate: Data from 2016, published by the UNESCO Institute for Statistics, 2018. (3)

Source for all other data: Understanding Children's Work Project's analysis of statistics from the Multiple Indicator Cluster Survey 5, 2014. (4)

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

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

	· · · · · · · · · · · · · · · · · · ·
Sector/Industry	Activity
Agriculture	Farming, including harvesting cotton, wheat, dates, sugarcane, and potatoes (5; 6; 7; 8; 9; 10; 11; 12; 13; 14)
	Raising livestock (7; 8; 10; 15)
	Fishing,† including deep-sea fishing† (16; 17; 18)
Industry	Manufacturing glass bangles,† surgical instruments,† and palm leaf mats (10; 19; 20; 21; 22; 18; 23)
	Weaving carpets,† weaving cloth using power looms,† and producing garments (6; 24; 25; 18; 26; 14; 27)
	Tanning leather† and stitching soccer balls (28; 18; 29; 23)
	Producing bricks (10; 6; 5; 30; 25; 14; 31; 2; 32)
	Mining coal,† salt, and gemstones (33; 34; 5; 35; 31; 36)
	Quarrying and crushing stone,† including gypsum (31; 10; 18)
	Welding and steel fabrication and carpentry in small workshops (8; 10; 25; 33; 31; 37; 38)

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Table 2. Overview of Children's Work by Sector and Activity (cont)

Sector/Industry	Activity		
Services	Domestic work (6; 33; 31; 39; 40; 41; 42; 43)		
	Working in hotels (7; 9; 33; 40; 26; 39; 44; 45)		
	Working in restaurants and tea stalls (10; 25; 14; 33; 44; 6; 5; 31; 46)		
	Working in transportation and gas stations (37; 45; 46)		
	Scavenging† and sorting recyclables, collecting waste paper (10; 6; 5; 25; 14; 33; 47; 44; 11)		
	Street vending and begging (44; 48; 49)		
	Automobile repair (6; 7; 12; 25; 14; 33; 31; 37; 46; 50)		
Categorical Worst Forms of Child Labor‡	Forced labor in brickmaking, carpet weaving, agriculture, manufacturing glass bangles, and mining coal (2; 12; 51; 26; 52; 53; 54; 55)		
	Forced domestic work, sometimes as a result of human trafficking (1; 41; 42; 39; 55)		
	Commercial sexual exploitation, sometimes as a result of human trafficking (48; 55; 56)		
	Forced begging, sometimes as a result of human trafficking (12; 57; 48; 55)		
	Forced recruitment of children by non-state armed groups for use in armed conflict (58; 59; 60)		
	Use in illicit activities, including trafficking and producing drugs (17; 59)		

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

A national child labor survey has not been conducted since 1996, and the lack of recent data hampers the ability of the federal and provincial governments to accurately assess the scope and prevalence of child labor. (12) Many child domestic workers are working under conditions of forced labor, including debt bondage, sexual assault, and extreme physical abuse. (1; 41; 42) Some children work with their families as bonded laborers in the production of bricks. (12; 61; 55)

Non-state militant groups forced children to engage in suicide attacks. (58; 59; 60) There are reports that religious schools are used for recruitment of children for armed groups. (62) Additionally, the Taliban recruited and forced children to attend *madrassas*, or religious schools, in Afghanistan and Pakistan, where they received religious and military training. Some families received cash payments in exchange for sending their children to the Taliban-run schools. (63)

Many children face barriers to accessing education due to high rates of teacher absenteeism, inadequate facilities, lack of transportation, and corporal punishment, which may deter children from attending school. (17; 64; 65) Moreover, armed groups and extremist groups regularly attack and threaten students, teachers, and schools, disrupting children's access to education. (62; 66) Some schools in Balochistan refused to enroll refugee children. (59)

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
KITOTEN	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	

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

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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 with regard to minimum age for work and hazardous work.

Table 4. Laws and Regulations on Child Labor

Standard	Related Entity	Meets International Standards: Yes/No	Age	Legislation
Minimum Age for Work	Federal	No	15	Section 50 of the Factories Act; Section 20 of the Shops and Establishments Ordinance; Section 26 of the Mines Act; Section 3 of Road Transport Workers Ordinance (67; 68; 69; 70);
	Punjab	Yes	15	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 (71; 72)
	Khyber Pakhtunkhwa	Yes	15	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 (73; 74; 75)
	Sindh	Yes	15	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 (76; 77; 78)
Minimum Age for	Federal	No	15	Sections 2–3 of the Employment of Children Act (79)
Hazardous Work	Punjab	Yes	18	Section 3(2) of the Punjab Restriction on Employment of Children Ordinance (72)
	Khyber Pakhtunkhwa	Yes	19	Sections 2(1)(a) and 3(2) of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (73)
	Sindh	Yes	19	Section 3(2) of the Sindh Prohibition of Employment of Children Act (78)
Identification of Hazardous Occupations or Activities Prohibited for Children	Federal	Yes		Parts 1–2 of the Schedule of the Employment of Children Act (79)
	Punjab	Yes		Schedule of Hazardous Work of the Punjab Restriction on Employment of Children Ordinance (77)
	Khyber Pakhtunkhwa	Yes		Parts 1–2 of the Schedule of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (73)
	Sindh	Yes		Schedule of the Hazardous Work of the Sindh Prohibition of Employment of Children Act (78)
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 (80; 81; 82)
	Punjab	Yes		Section 11(3) of the Punjab Restriction on Employment of Children Ordinance; Section 4 of the Punjab Bonded Labor System (Abolition) Act (72; 83)
	Khyber Pakhtunkhwa	Yes		Sections 2(j) and 3 of the Khyber Pakhtunkhwa Bonded Labor System (Abolition) Act (84)
	Sindh	Yes		Section 4 of the Sindh Bonded Labor System (Abolition) Act (85)
Prohibition of Child Trafficking	Federal	No		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A and 366B of the Penal Code (81; 86; 82)
Č	Khyber Pakhtunkhwa	No		Sections 2 and 52 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (87)
Prohibition of Commercial Sexual Exploitation of Children	Federal	No		Sections 292(B) and (C), 366A, 366B, 371A, and 371B of the Penal Code; Sections 2, 3 and 7 of the Prevention of Trafficking in Persons Act (88; 82)
	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 (72; 89)
	Khyber Pakhtunkhwa	No		Sections 2, 48 and 53 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (87)

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

Standard	Related Entity	Meets International Standards: Yes/No	Age	Legislation
Prohibition of Using	Federal	No		
Children in Illicit Activities	Punjab	Yes		Section 11(3)(c) of the Punjab Restriction on Employment of Children Act; Section 36 and 36A of the Punjab Destitute and Neglected Children Act (72; 89)
	Khyber Pakhtunkhwa	No		Sections 35, 38, and 45 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (87)
Prohibition of Military Recruitment				
State Compulsory	Federal	N/A*		
State Voluntary	Federal	Yes	18	Section 3 of the National Service Ordinance (90)
Non-state	Federal	No		
	Punjab	Yes	18	Section 11(3)(a) of the Punjab Restriction on Employment of Children Act (72)
Compulsory Education Age	Federal	Yes	16	Section 3 of the Right to Free and Compulsory Education Act (91)
	Punjab	Yes	16	The Punjab Free and Compulsory Education Ordinance (92)
	Khyber Pakhtunkhwa	Yes	16	Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (73)
	Sindh	Yes	16	Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (93)
	Balochistan	Yes	16	Section 3 of the Balochistan Compulsory Education Act (94)
Free Public Education	Federal	Yes		Section 3 of the Right to Free and Compulsory Education Act (91)
	Punjab	Yes		The Punjab Free and Compulsory Education Act (92)
	Khyber Pakhtunkhwa	Yes		Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (73)
	Sindh	Yes		Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (93)
	Balochistan	Yes		Section 2(f) of the Balochistan Compulsory Education Act (94)

^{*} No conscription (90)

The 18th Amendment to the Pakistan Constitution devolves all child welfare and labor issues from the federal government to the four provincial governments. Until each province repeals or adopts a replacement law, federal child labor laws are in force. (95) According to the Constitution, both federal and provincial governments can pass legislation on criminal law. (96)

In 2017, Sindh Province enacted the Sindh Prohibition of Employment of Children, which establishes 15 as the minimum age for employment and 19 as the minimum age for employment in hazardous work. (78) During the period, Khyber Pakhtunkhwa Province enacted the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act, making education free and compulsory for children ages 5 to 16. (97) The Punjab provincial assembly also passed the Punjab Destitute and Neglected Children (Amendment) Act, which increases the penalty for using children for begging and prohibits the use of children to sell goods with the intention of begging. (98)

In addition, in 2018, the federal government enacted the Prevention of Trafficking in Persons Act, which brings the law into compliance with international standards by exempting children from the requirement that force, fraud, or coercion must be proven in order to constitute trafficking and by including all trafficking for forced labor and commercial sexual exploitation. (99) The federal government also enacted the Islamabad Capital Territory Child Protection System Act in 2018. The Act provides minimum ages for work and hazardous work, provides a hazardous work list, and criminally prohibits worst forms of child labor in the Islamabad Capital Territory. (100; 59)

However, Pakistan's federal and provincial laws are not completely in compliance with international standards on child labor. The federal government's minimum age for work is not in compliance with international standards because they do not extend

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to informal employment. (79) Balochistan Province has not established a minimum age for employment or for hazardous work, although in October 2017, the provincial government drafted a Prohibition of Employment of Children Bill to ban the employment of children in 37 hazardous employment industries. (79; 59). In addition, hazardous work prohibitions for the federal government and the Khyber Pakhtunkhwa, Punjab, and Sindh Provinces do not cover brickmaking and domestic work, in which there is evidence that children are exposed to environmental health hazards in brickmaking and physical abuse in domestic work. (72; 73; 78; 79; 10; 43) Additionally, Sindh Province's laws setting the minimum age for work do not extend to informal work because they apply only to factories that employ 10 or more employees, shops, and establishments. (76; 77)

In addition, federal law does not prohibit the use of children for prostitution, pornography, or pornographic performances. (81) Although the Khyber Pakhtunkhwa Child Protection and Welfare Act prohibits the use of a child for the production of pornography, the law does not prohibit procuring and offering a child for the production of pornography. Moreover, it does not prohibit using and procuring a child for prostitution or pornographic performances. (87)

Federal and provincial laws, with the exception of the Punjab Provincial law, do not prohibit the use of children in drug production and drug trafficking. (72; 87) The federal and provincial governments, with the exception of Punjab Province, have not enacted laws that prohibit the recruitment and use of children by non-state groups for armed conflict. (17)

III. ENFORCEMENT OF LAWS ON CHILD LABOR

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

Table 5. Agencies Responsible for Child Labor Law Enforcement

Organization/Agency	Role
Provincial Labor Inspectors	Inspect industrial areas and markets to identify child labor violations, enforce provincial labor laws, and pursue legal action against employers. (17)
Provincial and Regional Police	Enforce violations of federal and provincial laws, including the Pakistan Penal Code and the Bonded Labor System (Abolition) Act, concerning the worst forms of child labor. Refer children taken into custody to Child Protection Officers. (17)
District Vigilance Committees	Implement the Bonded Labor System (Abolition) Act and assist in rehabilitating bonded laborers. Report to the District Magistrate. (17; 80)
Anti-Trafficking Unit of the Federal Investigation Agency	Enforce transnational trafficking-related laws, particularly the Prevention and Control of Human Trafficking Ordinance. Cooperate with other governments on trafficking cases, operate a hotline for victims, and publish information on anti-trafficking efforts on its Web site. (17)
Child Protection Units	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. (17; 87; 89; 101; 102; 103)

Labor Law Enforcement

In 2017, labor law enforcement agencies in Pakistan took actions to combat child labor (Table 6). However, gaps exist within the operations of the Provincial Labor Inspectors that may hinder adequate labor law enforcement, including with regard to human resource allocation.

Table 6. Labor Law Enforcement Efforts Related to Child Labor

Overview of Labor Law Enforcement	Related Entity	2016	2017
Labor Inspectorate Funding		Unknown (17)	Unknown* (59)
Number of Labor Inspectors	National Total	334 (104)	356 (59)
	Punjab	130 (104)	Unknown
	Khyber Pakhtunkhwa	39 (104)	39 (105)
	Sindh	120 (104)	Unknown
	Balochistan	45 (104)	Unknown

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

Overview of Labor Law Enforcement	Related Entity	2016	2017
Inspectorate Authorized to Assess Penalties	Punjab	Unknown	No (105)
inspectorate Authorized to Assess Fernances	Khyber Pakhtunkhwa	Unknown	No (105)
Training for Labor Inspectors	Kilybei Fakiitulikiiwa	OHKHOWH	140 (103)
Initial Training for New Employees	National	Unknown	Yes (59)
initial fraining for New Employees	Punjab	Unknown	No (105)
	Khyber Pakhtunkhwa	Unknown	Yes (105)
Training on New Laws Related to Child Labor	National	Unknown	Yes (59)
Training of New Laws Related to Child Labor		Unknown	
	Punjab Khyber Pakhtunkhwa		No (105)
Defrecher Courses Drovided	•	Unknown	Yes (105)
Refresher Courses Provided	National	Unknown	Yes (59)
	Punjab	Unknown	No (105)
	Khyber Pakhtunkhwa	Unknown	Yes (105)
Number of Labor Inspections Conducted	National Total	68,924 (104)	Unknown* (59)
	Punjab	9,237 (104)	26,078 (105)
	Khyber Pakhtunkhwa	45,367 (104)	2,780 (105)
	Sindh	4,933 (104)	Unknown
	Balochistan	9,387 (104)	Unknown
Number Conducted at Worksites	Punjab	Unknown	26,078 (105)
	Khyber Pakhtunkhwa	Unknown	2,780 (105)
lumber of Child Labor Violations Found	National Total	Unknown (17)	Unknown
	Punjab	773 (17)	4,491 (105)
	Khyber Pakhtunkhwa	Unknown	18 (105)
	Sindh	28 (17)	Unknown
Number of Child Labor Violations for Which Penalties were Imposed	National Total	Unknown (17)	Unknown
	Punjab	268 (17)	2,221 (105)
	Khyber Pakhtunkhwa	Unknown	18 (105)
			(/
Number of Child Labor Penalties Imposed that were Collected	Punjab	Unknown	1,134 (105)
Number of Child Labor Penalties Imposed that were Collected		Unknown Unknown	
	Punjab		1,134 (105)
	Punjab Khyber Pakhtunkhwa	Unknown	1,134 (105) Unknown (105)
	Punjab Khyber Pakhtunkhwa Punjab	Unknown Unknown	1,134 (105) Unknown (105) Yes (105)
Routine Inspections Conducted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa	Unknown Unknown Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105)
Routine Inspections Conducted Routine Inspections Targeted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab	Unknown Unknown Unknown Unknown (17)	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105) No (105)
Routine Inspections Conducted Routine Inspections Targeted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa	Unknown Unknown Unknown Unknown (17) Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105)
Routine Inspections Conducted Routine Inspections Targeted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab	Unknown Unknown Unknown Unknown (17) Unknown Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105) No (105) Yes (105)
Routine Inspections Conducted Routine Inspections Targeted Juannounced Inspections Permitted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Sindh	Unknown Unknown Unknown (17) Unknown Unknown Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105) No (105) Yes (105) Yes (105) Yes (105)
Routine Inspections Conducted Routine Inspections Targeted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa	Unknown Unknown Unknown (17) Unknown Unknown Unknown Unknown Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105) No (105) Yes (105) Yes (105) Yes (105) Yes (105) No (106) Yes (105)
Routine Inspections Conducted Routine Inspections Targeted Juannounced Inspections Permitted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Sindh Punjab Khyber Pakhtunkhwa	Unknown Unknown Unknown (17) Unknown Unknown Unknown Unknown Unknown Unknown Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105) No (105) Yes (105) Yes (105) Yes (105) No (106) Yes (105) Yes (105)
Routine Inspections Conducted Routine Inspections Targeted Juannounced Inspections Permitted Unannounced Inspections Conducted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Sindh Punjab Khyber Pakhtunkhwa Sindh	Unknown Unknown Unknown (17) Unknown Unknown Unknown Unknown Unknown Unknown Unknown Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105) No (105) Yes (105) Yes (105) No (106) Yes (105) Yes (105) No (106) Yes (105) No (106)
Routine Inspections Conducted Routine Inspections Targeted Juannounced Inspections Permitted Unannounced Inspections Conducted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Sindh Punjab Khyber Pakhtunkhwa Sindh Punjab Khyber Pakhtunkhwa Sindh Punjab	Unknown Unknown Unknown (17) Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105) No (105) Yes (105) Yes (105) Yes (105) No (106) Yes (105)
Routine Inspections Conducted Routine Inspections Targeted Juannounced Inspections Permitted	Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Punjab Khyber Pakhtunkhwa Sindh Punjab Khyber Pakhtunkhwa Sindh	Unknown Unknown Unknown (17) Unknown Unknown Unknown Unknown Unknown Unknown Unknown Unknown	1,134 (105) Unknown (105) Yes (105) Yes (105) Yes (105) No (105) Yes (105) Yes (105) No (106) Yes (105) Yes (105) No (106) Yes (105) No (106)

^{*} The government does not publish this information.

Following the devolution of federal powers to provincial governments, the provinces are responsible for enforcing labor laws, including those involving child labor law violations. (17) Limited labor inspection data are available for the provincial governments.

The number of labor inspectors is insufficient for the size of Pakistan's workforce, which includes approximately 64 million workers. In order to comply with the ILO's technical advice of a ratio approaching 1 inspector for every 40,000 workers in less developed economies, Pakistan should employ about 1,628 labor inspectors. (107; 108; 109) Provincial agencies that support law enforcement are also severely under-resourced. For example, labor inspectors receive insufficient resources, which hamper the Labor Inspectorate's ability to inspect workplaces. (110; 111; 59)

In 2017, research could not uncover labor inspection information for Sindh and Balochistan provinces. (59) However, data from previous years showed that labor inspections varied across provincial governments. In previous reporting periods, inspections were conducted regularly in Punjab, but in Sindh, inspectors stopped conducting unannounced inspections due to complaints of harassment, filed against inspectors by employers. (17; 110) In 2016, sources indicate that 39 labor inspectors in Khyber Pakhtunkhwa conducted 45,367 inspections. Each inspector therefore conducted an average of 1,163 inspections during this period. (104) This is a high number of inspections conducted by each inspector, and it is unknown whether this high number affects the quality of inspections. Across the provinces, fines and penalties were assessed infrequently and were insufficient to deter employers from using child labor. (95; 112)

Criminal Law Enforcement

In 2017, 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 with regard to resources.

Table 7. Criminal Law Enforcement Efforts Related to Child Labor

Overview of Criminal Law Enforcement	2016	2017
Training for Investigators		
Initial Training for New Employees	Yes (113)	Yes (59)
Training on New Laws Related to the Worst Forms of Child Labor	Unknown (17)	Unknown* (59)
Refresher Courses Provided	Unknown (17)	Unknown* (59)
Number of Investigations	Unknown (17)	Unknown* (59)
Number of Violations Found	Unknown (17)	Unknown* (59)
Number of Prosecutions Initiated	Unknown (17)	Unknown* (59)
Number of Convictions	Unknown (17)	Unknown* (59)
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	Yes (17)	Yes (17)

^{*} The government does not publish this information.

Although some District Vigilance Committees on bonded labor have been established in Pakistan, many of the committees are inactive or ineffective. (114)

IV. COORDINATION OF GOVERNMENT EFFORTS ON CHILD LABOR

The government has established mechanisms to coordinate its efforts to address child labor (Table 8).

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

Coordinating Body	Role and Description
Ministry of Overseas Pakistanis and Human Resource Development, Child Labor Focal Point	Coordinate government efforts to eliminate child labor at the federal and provincial levels. Responsible for developing a national strategy to eliminate child labor and works with provincial governments to adopt legislation and conduct child labor surveys. (115)
Provincial Child Labor Units	Coordinate and initiate interventions against child labor at the provincial level. (105)
Provincial and Federal Tripartite Consultative Committees	Advise on the enforcement of labor laws, including child labor laws and monitor the functioning of labor departments at the provincial level. Monitor the implementation of provinces' proposed interventions on child and forced labor at the federal level. (105)

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

Coordinating Body	Role and Description
Interagency Task Force	Coordinate 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. Support 27 Federal Investigation Agency anti-trafficking units that work with provincial and district police officers to monitor and combat internal and transnational human trafficking. (116; 55) Maintain an Integrated Border Management System. (117)
Punjab Child Protection and Welfare Bureau	Coordinate the protection of destitute and neglected children by appointing child protection officers, supervising child protection units, and establishing child protection institutions and child protection courts. (89)
Khyber Pakhtunkhwa Child Protection and Welfare Commission	Coordinate efforts to enhance the safety, welfare, and well-being of children, including by running programs for the prevention of exploitative child labor practices. (87) Led by the province's Social Welfare, Special Education and Women Empowerment Department. (118)
Sindh Child Protection Authority	Coordinate efforts to ensure the rights of children in need of special protection, including child laborers, by establishing child protection units and appointing child protection officers. (102) Headed by the provincial minister; members include two parliamentarians, lawyers, social activists, and representatives from departments that deal with children's issues. (119)

In 2017, the National Assembly passed the National Commission on the Rights of the Child Act, which mandates the federal government to establish a commission on the care and protection of children. The Commission's responsibilities will include coordinating with provincial child rights commissions, examining legislation and policies on child rights, and inquiring into child rights violations. (120; 121) Research was unable to determine whether existing coordinating bodies were active during the reporting period.

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 with regard to mainstreaming child labor issues into relevant policies.

Table 9. Key Policies Related to Child Labor ‡

Policy	Description
Provincial Plans of Action to Combat Child Labor	Detail how each province plans to revise child labor legislation, including by strengthening the capacity of labor inspectors, generating awareness of child labor, improving reporting, and computerizing labor inspection data. (122) Research did not discover what steps were taken in 2017 to implement these plans.
Sindh and Punjab Provincial Plans of Action to Combat Bonded Labor	Detail how the Sindh and Punjab provinces plan to revise their bonded labor laws. Include plans to strengthen the capacity of labor inspectors, generate awareness of bonded labor, improve reporting, and computerize labor inspection data. (123) Research did not discover what steps were taken in 2017 to implement these plans.
Federally Administered Tribal Areas (FATA) Child Protection Policy	Describes how FATA will promote and create a protective environment for all children. Includes actions to be taken toward the prevention and elimination of child labor. (124) Research did not discover what steps were taken in 2017 to implement this policy.
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. (125) Research did not discover what steps were taken in 2017 to implement this policy.

[‡] The government has other policies which may have addressed child labor issues or had an impact on child labor. (126; 127; 127; 128; 129; 130; 131; 132)

The provincial governments' education policies have not included child labor elimination and prevention strategies. (126; 127; 127; 128; 129; 130; 131)

VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2017, 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 with regard to 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. (133; 134) In 2017, \$2.75 million was disbursed to fund the 159 National Centers for Rehabilitation of Child Labor and \$251,000 was disbursed to the Child Support Program. (135)
Sabaoon Rehabilitation Center†	Pakistan Army 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. (116; 136) Research was unable to determine what steps were taken in 2017 in the implementation of this program.
Elimination of Child Labor and Bonded Labor Project (Integrated Project for Promotion of 'Decent Work for Vulnerable Workers' in Punjab Province)†	Punjab Government-funded programs that aims to provide education to vulnerable children, rehabilitate bonded laborers working in brick kilns, promote integration and coordination of government responses, strengthen legislation, increase the capacity of law enforcement and service providers, and increase the knowledge base on these issues. (137; 61; 138) As of May 2017, the program provided cash assistance to families of 88,000 child laborers to support children to attend school rather than working in brick kilns. (139)
ILO-Funded Projects	ILO projects in Pakistan that aim to eliminate child labor, including its worst forms. Current projects include \$216,000 project Sustaining GSP+ status by strengthened national capacities to improve ILS compliance and reporting (2015-2018), and \$465,000 project Elimination of child labor and promotion of Decent Work in the Stora Enso value chain in Pakistan (2015-2018). (140) The ILO supported drafting the discussion paper on 'Understanding Children Work in Pakistan,' and a Diagnostic Study on Decent Work Deficits in the Rural Economy; working on the pending amendments to the Child Labor Law of the Punjab Province; conducting child labor surveys in three provinces; setting up a permanent Child Labor Unit in Khyber Pakhtunkhwa Province; organizing a national labor law symposium; assessing Decent Work deficits, with a focus on child labor; and raising awareness on child labor in biomass and waste paper supply chains. (140)

[†] Program is funded by the Government of Pakistan.

In 2017, all four provinces allocated funds to conduct child labor surveys, using the ILO-UNICEF Statistical Information and Monitoring Program on Child Labor (SIMPOC) methodology. The Punjab Government began conducting the survey, and the Sindh Government began the planning process. (59)

The social programs of the federal and provincial governments are insufficient to address the prevalence and scope of Pakistan's child labor problem. Existing programs also do not provide enough protection and rehabilitation services for bonded child laborers and victims of human trafficking. (55) Government initiatives are needed specifically to target child domestic workers and child labor in the informal sector. (111) Furthermore, additional social programs are necessary to raise awareness and provide assistance to children used by non-state militant groups to engage in armed conflict. (141)

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	Ratify the Palermo Protocol on Trafficking in Persons.	2013 – 2017
	Ensure that the age up to which education is compulsory is the same as the minimum age for work in Balochistan Province.	2009 – 2017
	Establish a minimum age of 18 for hazardous work in the federal government and Balochistan Province.	2009 – 2017
	Create comprehensive prohibitions against additional specific hazardous activities, such as brickmaking and domestic work.	2009 – 2017
	Ensure that the federal government's and Sindh Province's minimum age laws extend to all sectors and informal employment, regardless of the number of employees.	2011 – 2017
	Ensure that the law criminalizes the use of children in all forms of commercial sexual exploitation, including for prostitution, child pornography, and pornographic performances.	2011 – 2017
	Ensure that the law prohibits the use of children in illicit activities, including in the production and trafficking of drugs.	2011 – 2017

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

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Area	Suggested Action	Year(s) Suggested
Legal Framework	Ensure that the law criminally prohibits the recruitment and use of children under 18 by non-state groups for armed conflict.	2015 – 2017
Enforcement	Collect and publish enforcement data for child labor law violations.	2010 – 2017
	Hire a sufficient number of labor inspectors for the size of the workforce to enforce child labor laws.	2016 – 2017
	Provide the funding necessary to adequately hire, train, and equip inspectors and investigators to enforce laws prohibiting the worst forms of child labor.	2010 – 2017
	Strengthen the Labor Inspectorate in Sindh Province by initiating targeted inspections.	2017
	Establish a referral mechanism between labor authorities and social services in all provinces.	2017
	Allow labor inspectors in all provinces to conduct inspections without notice and assess penalties.	2011 – 2017
	Determine whether the inspection ratio for each labor inspector in Khyber Pakhtunkhwa is appropriate to ensure the quality and scope of inspections.	2016 – 2017
	Ensure that fines and penalties are sufficient to deter employers from violating child labor laws.	2014 – 2017
	Publish information about criminal law investigations, violations found, prosecutions initiated, and the number of convictions in all provinces.	2016 – 2017
	Ensure that bonded labor vigilance committees are established and active throughout Pakistan.	2013 – 2017
Coordination	Publish information on the activities undertaken by coordinating bodies.	2017
Government Policies	Publish information on the implementation of existing child labor policies.	2017
	Integrate child labor elimination and prevention strategies in the education policies of the provincial governments.	2014 – 2017
Social Programs	Conduct child labor surveys at the federal and provincial levels.	2009 – 2017
	Ensure that all children have access to free and compulsory education, as required by law.	2011 – 2017
	Implement existing programs and increase the size and scope of government programs to reach children working in the worst forms of child labor, including domestic workers, bonded child laborers, and victims of human trafficking.	2009 – 2017
	Implement programs to raise awareness of and provide assistance to children used by non-state militant groups to engage in armed conflict.	2011 – 2017

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