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In 2018, Pakistan made a moderate advancement in efforts to eliminate the worst forms of child labor. All four provincial governments started conducting child labor surveys, which will constitute the first nationwide child labor survey since 1996. The federal government also passed the Prevention of Trafficking in Persons Act and convicted its first child pornography case. In addition, Khyber Pakhtunkhwa, Punjab, and Sindh provinces each adopted new policies that will address child labor. However, children in Pakistan engage in the worst forms of child labor, including in forced domestic work and in bonded labor in brick kilns and agriculture. Although the federal and provincial governments made meaningful efforts in all relevant areas during the reporting period, 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 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 and agriculture. (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	Related Entity	Age	Percent
Working (% and population)	All Pakistan	5 to 14	Unavailable
	Punjab Province	5 to 14	12.4
	Sindh Province	5 to 14	21.5
Attending School (%)	All Pakistan	5 to 14	Unavailable
	Punjab Province	5 to 14	77.1
	Sindh Province	5 to 14	60.6
Combining Work and School (%)	All Pakistan	7 to 14	Unavailable
	Punjab Province	7 to 14	8.2
	Sindh Province	7 to 14	11.6
Primary Completion Rate (%)	All Pakistan		71.3
	Punjab Province		Unavailable
	Sindh Province		Unavailable

Source for primary completion rate: Data from 2016, published by the UNESCO Institute for Statistics, 2019. (3)

Source for all other data: International Labor Organization's analysis of statistics from 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, and sugarcane (5-9)
	Fishing, including deep sea fishing (10,11)
Industry	Manufacturing glass bangles† and surgical instruments† (8,10,12-16)
	Weaving carpets,† producing garments, tanning leather,† and stitching soccer balls (8,10,15,17,18)

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

Sector/Industry	Activity
Industry	Producing bricks (1,19-21)
	Mining coal† and gemstones, and crushing stone† (10,21-23)
Services	Domestic work (2,24-26)
	Working in hotels, restaurants, gas stations, and automobile repair (6,8,27-30)
	Scavenging† and sorting garbage and recyclables, begging, and street vending (5,8,27,31-33)
Categorical Worst Forms of Child Labor‡	Forced labor in agriculture, brickmaking, carpet weaving, and coal mining (1,8,34-38)
	Forced domestic work, sometimes as a result of human trafficking (2,24,25,37)
	Commercial sexual exploitation, including use in the production of pornography, sometimes as a result of human trafficking (32,37,39-42)
	Forced begging, sometimes as a result of human trafficking (6,8,32,37,43)
	Forced recruitment of children by non-state armed groups for use in armed conflict (37)
	Use in illicit activities, including trafficking and producing drugs (44)

† 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 four provinces—Balochistan, Khyber Pakhtunkhwa, Punjab, and Sindh—and the Islamabad Capital Territory, 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. (45) When available, data and information are included for the federal and provincial governments in this report.

In 2018, all four provincial governments began conducting child labor surveys, which together will constitute a nationwide child labor survey. The surveys were funded in 2017 and are on track to be completed in 2019. (8) The most recent national child labor survey was conducted in 1996, and the lack of recent data has hampered the ability of the federal and provincial governments to accurately assess the scope and prevalence of child labor. (46)

Many child domestic workers are working under conditions of forced labor, including debt bondage, sexual assault, and extreme physical abuse. (2,25) Some children work with their families as bonded laborers in the production of bricks. (6,37,47) In addition, non-state armed militant groups forcibly recruited and used children in terrorist activities, including suicide attacks. These militant groups include Tehreek-e-Taliban Pakistan, and reports state that children were recruited from *madrassas* (Islamic religious schools). (8,48)

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. (8,49,50) Moreover, while reports state that the total number of terrorist attacks have decreased since 2009, armed groups and extremist groups continue to attack and threaten students, teachers, and schools, disrupting children’s access to education. (48,51)

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	✓

Table 3. Ratification of International Conventions on Child Labor (Cont.)

Convention	Ratification
 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 hazardous work.

Table 4. Laws and Regulations on Child Labor

Standard	Related Entity	Meets International Standards	Age	Legislation
Minimum Age for Work	Federal	No	15	Section 50 of the Factories Act; Section 20 of the Shops and Establishments Ordinance; Section 26 of the Mines Act; Section 3 of the Road Transport Workers Ordinance (52-55)
	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 (56-58)
	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 (59,60)
	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 (61-63)
Minimum Age for Hazardous Work	Federal	No	15	Sections 2–3 of the Employment of Children Act (64)
	Khyber Pakhtunkhwa	Yes	19	Sections 2(1)(a) and 3(2) of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (56)
	Punjab	Yes	18	Section 3(2) of the Punjab Restriction on Employment of Children Ordinance (60)
	Sindh	Yes	19	Section 3(2) of the Sindh Prohibition of Employment of Children Act (63)
Identification of Hazardous Occupations or Activities Prohibited for Children	Federal	Yes		Parts 1–2 of the Schedule of the Employment of Children Act (64)
	Khyber Pakhtunkhwa	Yes		Parts 1–2 of the Schedule of the Khyber Pakhtunkhwa Prohibition of Employment of Children Act (56)
	Punjab	Yes		Schedule of Hazardous Work of the Punjab Restriction on Employment of Children Ordinance (62)
	Sindh	Yes		Schedule of Hazardous Work of the Sindh Prohibition of Employment of Children Act (63)
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 (65-67)
	Khyber Pakhtunkhwa	Yes		Sections 2(j) and 3 of the Khyber Pakhtunkhwa Bonded Labor System (Abolition) Act (68)
	Punjab	Yes		Section 11(3) of the Punjab Restriction on Employment of Children Ordinance; Section 4 of the Punjab Bonded Labor System (Abolition) Act (60,69)
	Sindh	Yes		Section 4 of the Sindh Bonded Labor System (Abolition) Act (70)
Prohibition of Child Trafficking	Federal	Yes		Sections 3 and 7 of the Prevention of Trafficking in Persons Act; Sections 366A–366B of the Penal Code (66,67,71)
	Khyber Pakhtunkhwa	No		Sections 2 and 52 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (72)

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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)–(C), 366A–366B, and 371A–371B of the Penal Code; Sections 2, 3, and 7 of the Prevention of Trafficking in Persons Act (66,67,73)
	Khyber Pakhtunkhwa	No		Sections 2, 48, and 53 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (72)
	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 (60,74)
Prohibition of Using Children in Illicit Activities	Federal	No		
	Khyber Pakhtunkhwa	No		Sections 35, 38, and 45 of the Khyber Pakhtunkhwa Child Protection and Welfare Act (72)
	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 (60,74)
Minimum Age for Voluntary State Military Recruitment	Federal	Yes	18	Section 3 of the National Service Ordinance (75)
Prohibition of Compulsory Recruitment of Children by (State) Military	Federal	N/A*		
Prohibition of Military Recruitment by Non-state Armed Groups	Federal	No		
	Punjab	Yes		Section 11(3)(a) of the Punjab Restriction on Employment of Children Ordinance (60)
Compulsory Education Age	Federal	Yes	16	Section 3 of the Right to Free and Compulsory Education Act (76)
	Balochistan	Yes	16	Section 3 of the Balochistan Compulsory Education Act (77)
	Khyber Pakhtunkhwa	Yes	16	Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (56)
	Punjab	Yes	16	The Punjab Free and Compulsory Education Ordinance (78)
	Sindh	Yes	16	Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (79)
Free Public Education	Federal	Yes		Section 3 of the Right to Free and Compulsory Education Act (76)
	Balochistan	Yes		Section 2(f) of the Balochistan Compulsory Education Act (77)
	Khyber Pakhtunkhwa	Yes		Section 3 of the Khyber Pakhtunkhwa Free Compulsory Primary and Secondary Education Act (56)
	Punjab	Yes		The Punjab Free and Compulsory Education Act (78)
	Sindh	Yes		Section 3(1) of the Sindh Right of Children to Free and Compulsory Education Act (79)

* No conscription (75)

The federal and provincial governments have concurrent jurisdiction over labor legislation. (80) According to the Constitution, both federal and provincial governments can pass legislation on criminal law. (81)

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 to constitute trafficking and by including all trafficking for forced labor and commercial sexual exploitation. (67) In addition, the National Assembly passed a bill entitled the Islamabad Capital Territory Prohibition of Employment of Children Act, which would prohibit the employment of children age 14 and younger in any establishment, including agricultural and household establishments. The bill would also prohibit the employment of adolescents ages 15–18 from employment in hazardous work and establishes a schedule of hazardous work prohibited for adolescents. (82) The Senate must approve the bill before it can be enacted. (8) Lastly, a law banning domestic work for children under age 15 in Punjab Province came into effect in early 2019. (83,84)

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 it does not extend to informal employment. Sindh Province's laws setting the minimum age for work also do not extend to informal work or factories that employ fewer than 10 persons. (61,62) The federal minimum age for hazardous work also does not comply with international standards because it is below age 18. (64) Balochistan Province has not established a minimum age for employment or for hazardous work, and, therefore, federal child employment laws apply in Balochistan. (46,64) In addition, hazardous work prohibitions for the federal government and the Khyber Pakhtunkhwa, Punjab, and Sindh provinces do not cover brickmaking and domestic work, for which there is evidence that children are exposed to environmental health hazards in brickmaking and physical abuse in domestic work. (19,26,56,60,63,64)

Federal law does not prohibit the use of children for prostitution or pornographic performances. (66) In addition, federal and provincial laws, with the exception of Punjab provincial law, do not prohibit the use of children in drug production and drug trafficking. (60,72) 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. (11)

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 inspectorates 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	Inspects industrial areas and markets to identify child labor violations, enforces provincial labor laws, and pursues legal action against employers. (11)
Labor Courts	Assesses penalties for labor violations. (8,85,86)
Provincial and Regional Police	Enforces violations of federal and provincial laws, including the Pakistan Penal Code, Prevention of Trafficking in Persons Act, and the Bonded Labor System (Abolition) Act, concerning the worst forms of child labor. Refer children taken into custody to Child Protection Officers. (11,83)
District Vigilance Committees	Implements the Bonded Labor System (Abolition) Act and assists in rehabilitating bonded laborers. Reports to the District Magistrate. (11,65)
Federal Investigation Agency, 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. (8,11)
Child Protection Units	Takes into custody at-risk children, including those rescued from exploitative labor situations. Presents cases of children taken into custody to the Child Protection Court or the appropriate authority. Established in Punjab, Khyber Pakhtunkhwa, and Sindh provinces. (11,72,74,87-89)

During the reporting period, the Government of Balochistan Province had not yet established Child Protection Units throughout the Province as mandated by the 2016 Balochistan Child Protection Act; however, in 2018, the provincial government did launch a pilot Child Protection Unit in Quetta in preparation for establishing additional units. In addition, while District Vigilance Committees are functioning in Punjab Province and reportedly functioning in Sindh Province, they are not yet functional in Balochistan and Khyber Pakhtunkhwa provinces. (37,90)

Labor Law Enforcement

In 2018, 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 lack of data on provincial government efforts to enforce child labor laws.

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Table 6. Labor Law Enforcement Efforts Related to Child Labor

Overview of Labor Law Enforcement	Related Entity	2017	2018
Labor Inspectorate Funding		Unknown (44)	Unknown (8)
Number of Labor Inspectors	National Total	356 (44)	Unknown (8)
	Balochistan	Unknown	Unknown (8)
	Khyber Pakhtunkhwa	39 (91)	Unknown (8)
	Punjab	Unknown	Unknown (8)
	Sindh	Unknown	152 (8)
Inspectorate Authorized to Assess Penalties	Balochistan	Unknown	Unknown
	Khyber Pakhtunkhwa	No (91)	No (8)
	Punjab	No (91)	No (8)
	Sindh	No (8)	No (8)
Initial Training for New Labor Inspectors	National	Yes (44)	Yes (8)
	Khyber Pakhtunkhwa	Yes (91)	Unknown
	Punjab	No (91)	Yes (8)
Training on New Laws Related to Child Labor	National	Yes (44)	Yes (8)
	Khyber Pakhtunkhwa	Yes (91)	Unknown
	Punjab	No (91)	Unknown
Refresher Courses Provided	National	Yes (44)	Yes (8)
	Khyber Pakhtunkhwa	Yes (91)	Unknown
	Punjab	No (91)	Yes (8)
Number of Labor Inspections Conducted	National Total	Unknown (44)	11,910 (92)
	Balochistan	Unknown	Unknown (8)
	Khyber Pakhtunkhwa	2,780 (91)	Unknown (8)
	Punjab	26,078 (91)	51,798† (93)
	Sindh	Unknown	Unknown (8)
Number Conducted at Worksite	Khyber Pakhtunkhwa	2,780 (91)	Unknown (8)
	Punjab	26,078 (91)	Unknown (8)
Number of Child Labor Violations Found	National Total	Unknown	Unknown (8)
	Punjab	4,491 (91)	98† (93)
	Khyber Pakhtunkhwa	18 (91)	Unknown (8)
	Sindh	Unknown	Unknown (8)
Number of Child Labor Violations for Which Penalties Were Imposed	National Total	Unknown	Unknown (8)
	Khyber Pakhtunkhwa	18 (91)	Unknown (8)
	Punjab	2,221 (91)	Unknown (8)
	Khyber Pakhtunkhwa	Unknown (91)	Unknown (8)
Number of Child Labor Penalties Imposed that Were Collected	Punjab	1,134 (91)	Unknown (8)
Routine Inspections Conducted	Khyber Pakhtunkhwa	Yes (91)	Yes (8)
	Punjab	Yes (91)	Yes (8)
Routine Inspections Targeted	Khyber Pakhtunkhwa	No (91)	Unknown (8)
	Punjab	Yes (91)	Unknown (8)
Unannounced Inspections Permitted	Khyber Pakhtunkhwa	Yes (91)	Yes (8)
	Punjab	Yes (91)	Yes (8)
	Sindh	No (94)	Yes (8)
Unannounced Inspections Conducted	Khyber Pakhtunkhwa	Yes (91)	Unknown (8)
	Punjab	Yes (91)	Unknown (8)
	Sindh	No (94)	Unknown (8)
Complaint Mechanism Exists	Khyber Pakhtunkhwa	Yes (91)	Yes (8)
	Punjab	Yes (91)	Yes (8)
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Khyber Pakhtunkhwa	No (91)	No (8)
	Punjab	No (91)	No (8)

† Data are from January - September 5, 2018 (93)

Following the devolution of federal powers to provincial governments, the provinces are responsible for enforcing labor laws, including those involving child labor law violations. (11) Provincial labor departments collect comprehensive data on labor law enforcement at the district level. However, there is no centralized repository for the data, nor any regular mechanism for reporting it to the federal government. (8) Therefore, limited labor inspection data are available for the provincial governments.

Based on 2017 data, the number of labor inspectors is likely insufficient for the size of Pakistan's workforce, which includes approximately 64 million workers. According to the ILO's technical advice of a ratio approaching 1 inspector for every 15,000 workers in developing economies, Pakistan would employ about 4,259 labor inspectors. (95-97) Labor inspectorates do not receive sufficient resources, which may hamper the labor inspectors' ability to inspect workplaces. (44,83,98,99) For example, labor departments in Khyber Pakhtunkhwa, Punjab, and Sindh provinces did not provide funds to cover the cost of transportation to conduct inspections. (8) In Sindh Province, it is reported that inspectors stopped conducting unannounced inspections due to complaints of harassment filed against inspectors by employers. (94) Across the provinces, fines and penalties were assessed infrequently and were insufficient to deter employers from using child labor. (45,100)

In 2018, efforts were made by the provincial governments to increase labor inspectorate capacity and enforce child labor laws. For example, the Government of Sindh Province hired 32 new labor inspectors, and labor inspectors in Punjab Province received training through the ILO's Strengthening Labor Inspection Systems in Pakistan project. (8) Between January and August 2018, the Punjab Labor Welfare Department found 65 cases of child labor during inspections of 482 brick kilns, and 33 cases of child labor during inspections of 732 establishments. (93)

During the reporting period, Sindh Province also strengthened protections against child labor by enacting the Sindh Home-Based Workers Act. The act requires the establishment of a Sindh Workers Welfare Board, which is mandated to conduct a survey of home-based work for the identification and removal of hazardous conditions, and to discourage the use of child labor in home-based work. (101)

Criminal Law Enforcement

In 2018, 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 data on federal and provincial government efforts to enforce laws criminally prohibiting the worst forms of child labor.

Table 7. Criminal Law Enforcement Efforts Related to Child Labor

Overview of Criminal Law Enforcement	2017	2018
Initial Training for New Criminal Investigators	Yes (44)	Unknown (8)
Training on New Laws Related to the Worst Forms of Child Labor	Unknown (44)	Unknown (8)
Refresher Courses Provided	Unknown (44)	Yes (92)
Number of Investigations	Unknown (44)	Unknown (8)
Number of Violations Found	Unknown (44)	Unknown (8)
Number of Prosecutions Initiated	Unknown (44)	Unknown (8)
Number of Convictions	Unknown (44)	Unknown (8)
Imposed Penalties for Violations Related to The Worst Forms of Child Labor	Unknown	Unknown
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	Yes (11)	Unknown (8)

While the federal and provincial governments do not publish data on efforts to enforce laws prohibiting the worst forms of child labor, the federal government did report on efforts to enforce Section 366/A of the federal Penal Code prohibiting the procurement of minor girls under age 18. (8,92) In 2018, there were 2 registered cases involving Penal Code Section 366/A in Khyber Pakhtunkhwa Province, 19 in Punjab Province, and 7 in Sindh Province. In addition, there was 1 case prosecuted in Khyber Pakhtunkhwa Province, 18 in Punjab Province,

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and 2 in Sindh Province. During the reporting period, Pakistan's federal government also convicted its first perpetrator in a child pornography case. The perpetrator was sentenced to 7 years in prison for distributing child pornography as part of an international child pornography cyber network. (8,102,103)

In 2018, Punjab Province strengthened protections for forced labor victims, including children, by adopting the Punjab Bonded Labour System (Abolition) Amendment Act, which increased penalties for employing bonded laborers by requiring perpetrators to both serve time in prison and pay a fine. (104)

IV. COORDINATION OF GOVERNMENT EFFORTS ON CHILD LABOR

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

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

Coordinating Body	Role & Description
Provincial Child Labor Units	Coordinates and initiates interventions against child labor at the provincial level. (91)
Provincial and Federal Tripartite Consultative Committees	Advises on the enforcement of labor laws, including child labor laws and monitors the functioning of labor departments at the provincial level. Monitors the implementation of provinces' proposed interventions on child and forced labor at the federal level. (91)
Interagency 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 Federal Investigation Agency anti-trafficking units that work with provincial and district police officers to monitor and combat domestic and transnational human trafficking. (37,106) Maintains an Integrated Border Management System. (107)
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. (89)
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. (72) Led by the Province's Social Welfare, Special Education and Women Empowerment Department. (108)
Punjab Child Protection and Welfare Bureau	Coordinates 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. 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. (74)
Sindh Child Protection Authority	Coordinates 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. Reviews and proposes amendments to existing laws and monitors the implementation of laws relevant to the protection of children. (88) Headed by the provincial minister; members include two parliamentarians, lawyers, social activists, and representatives from departments that deal with children's issues. (109)

In 2018, the federal government enacted the Islamabad Capital Territory Child Protection System Act, which mandates the establishment of a Child Protection Advisory Board. Once established, the board's responsibilities will include advising the government on the implementation of relevant laws and policies, ensuring that the child protection mechanism is effective, maintaining a case management system, regulating caregiver organizations, and submitting an annual report. (110) However, the federal government has not yet established the National Commission on the Rights of the Child as mandated by law. (8) 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 mainstreaming child labor issues into relevant policies.

Table 9. Key Policies Related to Child Labor

Policy	Description
Sindh and Punjab Provincial Plans of Action to Combat Bonded Labor	Details how the Sindh and Punjab provinces plan to revise their bonded labor laws. Includes plans to strengthen the capacity of labor inspectors, generate awareness of bonded labor, improve reporting, and computerize labor inspection data. (111) During the reporting period, research was unable to determine what steps were taken to implement these plans
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. (112) Research was unable to determine what steps were taken to implement this policy.

‡ The government had other policies that may have addressed child labor issues or had an impact on child labor. (116-120)

† This policy was implemented during the reporting year.

In 2018, it was reported that the Khyber Pakhtunkhwa provincial cabinet approved a child labor policy, which would be the first child labor policy in Pakistan. Research has been unable to find a copy of the child labor policy. (8,121) During the reporting period, Punjab's provincial government also approved Punjab Labor Policy 2018, which is reported to include goals to conduct a Province-wide child labor survey, launch an online reporting and case management system for child labor, provide trainings for labor inspectors on child labor laws, and enroll out-of-school children in education programs. (122,123) Research has been unable to find a copy of the new labor policy. (8)

The provincial governments' education policies have not included child labor elimination and prevention strategies. (116-119)

VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2018, 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. (124,125) During the reporting period, research was unable to determine what steps were taken to implement this program during the reporting period.
Elimination of Child Labor and Bonded Labor Project (Integrated Project for Promotion of "Decent Work for Vulnerable Workers" in Punjab Province)†	Punjab Province-funded programs that aim to provide education to vulnerable children, rehabilitate bonded laborers working in brick kilns, promote integration and coordination of government responses, strengthen legislation, increase the capacity of law enforcement and service providers, and increase the knowledge base on these issues. (47,127,128) Project activities have been on hold since the transition to a newly elected provincial government in August 2018. (8)
ILO-Funded Projects	ILO projects in Pakistan aimed to eliminate child labor, including the \$216,000 project Sustaining GSP Plus Status by Strengthened National Capacities to Improve International Labor Standards (ILS) Compliance and Reporting (2015–2018), and the \$465,000 project Elimination of Child Labor and Promotion of Decent Work in the Stora Enso Value Chain in Pakistan (2015–2018). (129)

† Program is funded by the Government of Pakistan.

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. (37) Government initiatives are needed to specifically target child labor in the informal sector, including child labor and forced child labor in domestic work. (99) 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. (130)

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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 II).

Table II. Suggested Government Actions to Eliminate Child Labor

Area	Suggested Actions	Year(s) Suggested
Legal Framework	Accede to the Palermo Protocol on Trafficking in Persons.	2013 – 2018
	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 – 2018
	Establish a minimum age for work of at least 14 in Balochistan Province.	2013 – 2018
	Establish a minimum age of 18 for hazardous work in Pakistan and Balochistan Province.	2009 – 2018
	Create comprehensive prohibitions against additional specific hazardous activities, such as brickmaking and domestic work.	2009 – 2018
	Ensure that the law criminalizes the use of children in all forms of commercial sexual exploitation, including for prostitution and pornographic performances.	2011 – 2018
	Ensure that the law prohibits the use of children in illicit activities, including in the production and trafficking of drugs.	2011 – 2018
	Ensure that the law criminally prohibits the recruitment and use of children under age 18 by non-state groups for armed conflict.	2015 – 2018
Enforcement	Establish Child Protective Units in Balochistan Province to ensure that services are in place to remove children from exploitative labor situations and refer them for appropriate child protection services.	2018
	Ensure that District Vigilance Committees that seek to ensure enforcement and implementation of bonded labor prohibitions are established and active throughout Pakistan.	2013 – 2018
	Publish enforcement data for child labor law violations, penalties imposed, and penalties collected for all provinces. In addition, publish information about labor inspectorate funding, the number of labor inspectors, the number of labor inspections conducted at the worksite, whether routine inspections were targeted, and whether unannounced inspections were conducted for all provinces.	2010 – 2018
	Establish a referral mechanism between criminal law enforcement agencies and social services in all provinces.	2018
	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
	Increase the number of labor inspectors to meet the ILO's technical advice.	2016 – 2018
	Provide the funding necessary to adequately hire, train, equip, and cover the cost of transportation for inspectors to enforce child labor laws.	2010 – 2018
	Allow labor inspectors in all provinces to conduct inspections without notice and assess penalties.	2011 – 2018
	Ensure that fines and penalties are sufficient to deter employers from violating child labor laws.	2014 – 2018
	Publish information about criminal law investigations, violations found, prosecutions initiated, and the number of convictions in all provinces.	2016 – 2018
Coordination	Establish a referral mechanism between labor authorities and social services in all provinces.	2017 – 2018
	Establish a National Commission on the Rights of the Child Act, as mandated by federal law.	2018
Government Policies	Publish information on the activities undertaken by coordinating bodies.	2017 – 2018
	Publish information on the implementation of existing child labor policies.	2017 – 2018
Social Programs	Integrate child labor elimination and prevention strategies in the education policies of the provincial governments.	2014 – 2018
	Complete and publish child labor surveys at the federal and provincial levels.	2009 – 2018
	Implement programs to address high rates of teacher absenteeism, inadequate facilities, lack of transportation, and use of corporal punishment to ensure that all children have access to free and compulsory education, as required by law. Increase security for schools to protect children and teachers from attacks by non-state armed and extremist groups.	2011 – 2018
	Publish information on the activities undertaken to implement government programs, such as the Bait-ul-Mal programs.	2018
	Implement 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 – 2018
	Implement programs to raise awareness of and provide assistance to children used by non-state militant groups to engage in armed conflict.	2011 – 2018

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