

Human Rights Challenges of Religious Minorities in Pakistan

Why do religious minorities in Pakistan continue to experience discrimination, insecurity and violations of their human rights despite constitutional guarantees and international human rights commitments?

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Table of Contents

Page Number

Executive Summary-----	4
Part 1: Constitutional Recognition and Protection:-----	5
Constitutional Guarantees and International Human Rights Commitments:.....	5
Part 2: Constitutional and Legal Provisions Creating Religious Differentiation:.....	6
2.1 Religious Qualification for the President and Prime Minister:.....	6
2.2 Constitutional Classification of Religious Identity and Restrictions on Religious Expression.....	6
2.3 Islamic Character of the Constitutional Order.....	7
Part 3: Structural Factors and Human Rights Concerns.....	8
3.1 Freedom of Religion or Belief and Social Exclusion.....	8
3.2 Religious Bias and Exclusion in Education and Curriculum:.....	9
a) A structural, not incidental, bias:.....	9
b) The Single National Curriculum: reform or relabeling?.....	9
c) Two 2025 audits show the pattern persists:.....	10
d) What this looks like in the classroom:.....	11
e) Synthesis: Constitutional Guarantee versus Institutional Practice:.....	11
3.3 Madrassas, Religious Discourse and Hate Speech:.....	12
b) Two Decades of Reform Announcements, One Recurring Result:.....	13
b.1) What Madrasa Textbooks Actually Teach: Evidence from the Classroom.....	14
c) From Theological Belief to Organized Persecution by State:.....	16
c.1) Religious Political Parties as Incitement Actors: TLP, AMTKN, and the Limits of State Response. .	19
d) From Sermon to Mob: The Mosque Loudspeaker as an Incitement Tool:.....	20
e) Social media as an accelerant, not just a mirror:.....	21
f) Synthesis: an unregulated discourse ecosystem, not isolated incidents:.....	22
3.4 Blasphemy Laws, Accusations and Mob Violence:.....	22
a) The Legal Framework: Colonial Origins, Zia-Era Expansion.....	22
b) The Scale of Accusation: Record Numbers, Rising Trend.....	23
c) The Gap Between Accusation and Justice: Structural Failure of Due Process.....	23
d) Extrajudicial Violence and the Failure of State Protection.....	25
e) Blasphemy as a Weapon: Personal Disputes, Land Disputes, and Organized Entrapment:.....	25
f) Lawyers, Judges, and the Shrinking Space for Due Process:.....	25
g) International Response and Pakistan's Obligations:.....	26
h) Synthesis.....	26
3.5 Forced Conversion and Marriage: Religion, Gender and Economic Vulnerability:.....	27
a) The Nature of the Practice:.....	27
b) The Scale --- and the Problem of Under-Reporting:.....	28
References	54

c) The Legal Mechanism of Impunity:.....	28
d) The Role of Shrines, Pirs, and Feudal Structures:.....	30
e) International Response and Pakistan's Obligations:.....	32
f) Synthesis:.....	33
3.6 Socio-Economic Discrimination and Class Vulnerability:.....	33
a) The Caste-Religion-Class Intersection.....	33
b) The Institutionalization of Menial Labour.....	34
c) Workplace Conditions and the Cost of Religious Identity.....	34
d) The 5% Employment Quota: A Promise Systematically Broken.....	36
e) Bonded Labour, Land Grabs, and Rural Vulnerability.....	37
f) Synthesis-----	37
3.7 Political Marginalisation and Unequal Citizenship.....	37
a) The Architecture of Nominal Representation.....	37
b) Constitutional Exclusion from the Highest Offices.....	38
c) The Separate Voter List: Ahmadi Disenfranchisement.....	38
d) The Competitive Outbidding Dynamic.....	39
e) Synthesis-----	40
3.8 Weak Law Enforcement, Access to Justice and Impunity.....	40
a) Impunity as a Structural Feature.....	41
b) The Supreme Court's 2014 Directives and Their Non-Implementation.....	41
c) Police as Perpetrators and Facilitators.....	41
d) The Access to Justice Barrier.....	42
e) Synthesis-----	42
Part 4: From Formal Protection to Substantive Equality.....	43
4.1 The Central Finding.....	43
4.2 What Explains the Gap: Five Structural Factors.....	43
4.3 What Substantive Equality Would Require.....	45
Positive State Initiatives: A Record of Partial Progress -----	47
Part 5: Recommendations To the Government of Pakistan and Federal Institutions.....	48
On constitutional and legal reform:.....	48
On accountability and law enforcement:.....	50
On madrasa regulation:.....	50
On employment and economic inclusion:.....	50
On the National Commission for Minorities' Rights:.....	51
To Provincial Governments.....	51
To the International Community.....	51
To Civil Society --- in Pakistan and Internationally.....	52
Closing Note.....	53

Executive Summary

This report examines why religious minorities in Pakistan — including Christians, Hindus, Ahmadis, Sikhs and Baha'is — continue to experience discrimination, insecurity and violations of their human rights despite constitutional guarantees and Pakistan's international human rights commitments. It finds that the gap between formal protection and lived reality is not incidental but structural, sustained by five interlocking factors documented across eight thematic areas.

Part 1 and Part 2 set out the constitutional foundation: Pakistan's Constitution guarantees freedom of religion, equality before the law and protection of minorities, while simultaneously restricting the country's highest elected offices to Muslims (Articles 41(2) and 91(3)), constitutionally classifying Ahmadis as non-Muslim (Article 260(3)), and criminalising specific forms of Ahmadi religious expression (Pakistan Penal Code Sections 298-B and 298-C).

Part 3 documents eight structural domains in which this constitutional tension plays out in practice: social exclusion and restricted freedom of worship; religious bias embedded in national curricula; hate speech and under-regulated madrasa content; the weaponisation of blasphemy laws, which produced a record 344 accusations in 2024 and at least 104 extrajudicial killings of the accused between 1994 and 2024; forced conversion and marriage affecting hundreds of Hindu and Christian women and girls each year; socio-economic confinement, including the concentration of Christians in sanitation work and the systematic non-fulfilment of the 5% minority employment quota; political marginalisation despite reserved seats; and weak law enforcement that leaves perpetrators of anti-minority violence largely unprosecuted.

Part 4 draws these findings into a single account: the constitutional order embeds exclusion alongside protection; the state has functioned as both protector and, in documented instances, perpetrator; the political economy of religious mobilisation rewards accommodation of pressure groups over minority protection; impunity operates as de facto policy; and successive reform commitments have been announced but not implemented.

Part 5 sets out thirty-six recommendations addressed to the Government of Pakistan and federal institutions, provincial governments, the international community, and civil society — covering constitutional and blasphemy-law reform, accountability for state actors, madrasa regulation, employment-quota enforcement, and support for the National Commission for Minorities' Rights.

The central conclusion of this report is that Pakistan does not lack legal commitments to minority rights; it lacks consistent enforcement of the commitments it has already made. Closing this gap is a matter of political will rather than the invention of new principles.

Part 1: Constitutional Recognition and Protection:

KEY TENSION

The coexistence of protective and restrictive provisions raises important questions concerning equality, non-discrimination, freedom of religion or belief and the principle of equal citizenship.

Constitutional Guarantees and International Human Rights Commitments:

The protection of religious minority rights in Pakistan is grounded in a range of constitutional guarantees. Article 20 protects the freedom to profess, practise and propagate religion, while Article 25 guarantees equality before the law and equal protection of the law. Articles 26 and 27 provide safeguards against discrimination in access to specified public places and in appointments to the service of Pakistan, respectively. Article 28 protects the right to preserve language, script and culture, while Article 36 directs the State to safeguard the legitimate rights and interests of minorities.

These constitutional commitments are reinforced by Pakistan's obligations under international human rights instruments, including the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the International Convention on the Elimination of All Forms of Racial Discrimination (CERD). Pakistan has also supported relevant recommendations through the Universal Periodic Review (UPR), including recommendations concerning interfaith harmony, combating hate speech and protecting places of worship. Together, these constitutional and international commitments establish an important legal framework for the protection of religious minorities in Pakistan. However, the framework also contains provisions that differentiate citizens on the basis of religion and, in some cases, impose specific restrictions on religious identity and expression. The coexistence of these protective and restrictive provisions raises important questions concerning equality, non-discrimination, freedom of religion or belief and the principle of equal citizenship.

Part 2: Constitutional and Legal Provisions Creating Religious Differentiation:

2.1 Religious Qualification for the President and Prime Minister:

CONSTITUTIONAL PROVISION

Article 41(2) requires the President to be a Muslim, while Article 91(3) requires the National Assembly to elect a Muslim member as Prime Minister — excluding non-Muslim citizens from Pakistan's two highest elected offices solely on the basis of religious identity.

The Constitution of Pakistan expressly restricts eligibility for the country's two highest constitutional offices on the basis of religion. **Article 41(2)** requires the President to be a Muslim, while **Article 91(3)** requires the National Assembly to elect a Muslim member as Prime Minister.

These provisions exclude non-Muslim citizens from eligibility for the two highest elected offices solely on the basis of their religious identity, rather than citizenship, competence or electoral support. This creates a clear distinction between citizens based on religion and raises questions concerning equal citizenship and political participation.

Under **Article 25 of the ICCPR**, citizens have the right to participate in public affairs and to be elected on general principles of equality, while **Article 26** guarantees equality before the law and prohibits discrimination, including on the basis of religion. The religious qualifications in Articles 41(2) and 91(3) therefore create a significant tension between Pakistan's constitutional commitment to equality and minority protection and its explicit religious restrictions on eligibility for the highest elected offices.

2.2 Constitutional Classification of Religious Identity and Restrictions on Religious Expression

LEGAL FRAMEWORK

Sections 298-B and 298-C of the Pakistan Penal Code impose criminal restrictions on specific forms of religious expression by Ahmadis, including the use of Islamic terminology, practices and religious designations.

Article 260(3) establishes constitutional definitions of "Muslim" and "non-Muslim" applicable to the Constitution, enactments and other legal instruments. It defines a Muslim through specified theological criteria and expressly includes persons belonging to the Qadiani or Lahori groups who call themselves Ahmadis within the constitutional category of "non-Muslim."

This constitutional classification is particularly significant when considered alongside **Sections 298-B and 298-C of the Pakistan Penal Code**, introduced through Ordinance XX of 1984. These provisions impose criminal restrictions on certain forms of religious expression by Ahmadis, including the use of specific Islamic terminology, practices and religious designations.

Taken together, these provisions establish a legal framework in which the State not only determines the religious status of a particular community but also places criminal restrictions on aspects of its religious identity and expression. This raises significant concerns concerning freedom of religion or belief, religious self-identification, equality and non-discrimination under Pakistan's constitutional guarantees and its international human-rights obligations.

2.3 Islamic Character of the Constitutional Order

Article 2 declares Islam to be the State religion of Pakistan, while **Article 2A** makes the Objectives Resolution a substantive part of the Constitution, establishing an Islamic foundation for the exercise of state authority while also affirming principles including democracy, freedom, equality and protection of minorities.

Articles 227--231 further embed Islamic principles within the legislative and constitutional framework. Article 227 requires existing and future laws to conform to the injunctions of Islam as laid down in the Quran and Sunnah, while Articles 228--231 establish the Council of Islamic Ideology and define its advisory role in relation to legislation. Article 227(3), however, expressly protects the personal laws and citizenship status of non-Muslim citizens.

This framework reflects a constitutional tension: while the Constitution guarantees equality, religious freedom and protection of minorities, it simultaneously gives Islamic principles a distinctive and institutionalised role in the legal order. The human-rights concern therefore lies not simply in the State's Islamic identity, but in whether the application of these provisions can be reconciled with equal citizenship, non-discrimination and freedom of religion or belief for all citizens.

Part 3: Structural Factors and Human Rights Concerns

3.1 Freedom of Religion or Belief and Social Exclusion

Article 20 of the Constitution guarantees every citizen the right to profess, practise and propagate his or her religion, subject to law, public order and morality. The human-rights concern is therefore whether individuals and communities are able to exercise this right in practice, including through worship, religious observance and the expression of their religious identity.

The most direct legal restrictions on religious expression concern the Ahmadi community. Article 260(3) constitutionally classifies Ahmadis as non-Muslims, while Sections 298-B and 298-C of the Pakistan Penal Code criminalise specified forms of religious expression and the use of certain Islamic religious terminology. These provisions can therefore affect the ability of Ahmadis to practise and publicly express their religion according to their own understanding.

The practical application of these provisions is documented by the National Commission for Human Rights (NCHR), Pakistan's statutory human rights body. The NCHR reported that Sections 298-B and 298-C were repeatedly invoked in relation to routine religious conduct by Ahmadis, including offering Friday prayers, conducting Eid rituals, alleged preaching and the presence of religious symbols. It further noted that where police initially declined to register cases, complainants pursued court-directed registration of FIRs through the Justice of the Peace mechanism under Section 22-A(6) of the Code of Criminal Procedure. These findings illustrate how criminal provisions concerning religious identity and expression can be applied to ordinary religious conduct and expose members of the Ahmadi community to criminal proceedings.

For other religious minorities, freedom of worship can be constrained by insecurity, inadequate protection and the poor condition of places of worship. An HRCP fact-finding report documented concerns among Hindu communities in Sindh, where repeated terrorist threats led police to advise communities in Jacobabad, Shikarpur and surrounding areas to increase security at places of worship. In Liaquatpur, South Punjab, the fact-finding by HRCP work documented Hindu temples and graveyards in a state of disrepair, with the community unable to obtain adequate resources for their reconstruction and security. In one instance, police required the community to construct protective walls around a dharmashala and registered an FIR when the impoverished community could not meet the requirement.

These examples demonstrate that freedom of religion involves more than the formal right to worship. The effective exercise of that right also depends on the security, accessibility and protection of places of worship and on the ability of communities to maintain them. Where legal restrictions, security threats, inadequate institutional protection and socio-economic vulnerability intersect, the constitutional guarantee of religious freedom may remain only partially realised.

3.2 Religious Bias and Exclusion in Education and Curriculum:

BY THE NUMBERS

A 2023 review of 145 compulsory-subject textbooks found religious content so heavily embedded in nominally secular subjects that it became effectively compulsory for non-Muslim students — concentrated in Pakistan Studies (15%), History (4%) and Urdu (0.66%).

If Section 3.1 showed how exclusion operates in social life, the education system shows how it is reproduced institutionally, from the first grade onward. Pakistan's public curriculum has long been criticized not merely for *omitting* religious minorities, but for actively teaching stereotypes about them --- a pattern with roots in the Zia-ul-Haq-era Islamization of the curriculum in the 1980s, documented continuously by researchers for nearly two decades, and --- as two independent studies published in 2025 confirm --- still unresolved today.

a) A structural, not incidental, bias:

Researchers reviewing Pakistan's National Education Policy and National Curriculum have long argued that bias is written into the documents themselves, not merely an enforcement gap: the official guideline that curricular material "should be unbiased and non-controversial" has itself been repeatedly violated by the curriculum built to implement it, turning what was meant to be a *national* curriculum into what one researcher called a "divider curriculum." A 2023 study by the Centre for Social Justice (CSJ), which reviewed 145 compulsory-subject textbooks for Grades 1--10, gave this claim empirical weight: it found that religious content was embedded so heavily in nominally secular subjects --- English, Urdu, General Knowledge, Social Studies, History, and Pakistan Studies --- that it effectively became compulsory for all students, including non-Muslims, to study and be examined on Islamic teachings, concentrated especially in Pakistan Studies (15%), History (4%), and Urdu (0.66%). The same review found outright derogatory content, including references to a "Hindus' mentality," "complete dominance of Hindus over Muslims," and caste-based slurs such as "untouchable," alongside one-sided victim/oppressor narratives about religious communities in History, Social Studies, and Pakistan Studies texts. Earlier research documented even starker material persisting into the 2010s --- passages alleging Hindus would, given the chance, "assert their power over the weak" and deprive them of education, and statements that cooperation with Hindus is "impossible" given differing religious and cultural systems.

b) The Single National Curriculum: reform or relabeling?

The 2020--21 Single National Curriculum (SNC) was presented as the corrective. In principle, it aligns with Article 22 of the Constitution: for the first time, the government developed and notified a "Religious Education" curriculum for five minority communities --- Christian, Hindu, Sikh, Baha'i, and Kalasha --- replacing the generic "Ethics" subject that non-Muslim students had previously studied in place of Islamiyat. In practice, three problems have undercut it. First, implementation has lagged: alternative religious textbooks for minority faiths, announced by the government in 2020, had still not reached the market years later, and even after formal 2023 approval, CSJ found rollout slow, particularly for qualified teachers, especially in schools with only one or two minority-faith students. Second, the overall religious content in

mainstream subjects increased rather than decreased: Islamiyat now begins in Grade 1 rather than Grade 3, with added Qur'anic recitation and hadith, and one Lahore-based study found 9--23% of English-textbook content in Grades 3--5 violates constitutional safeguards for religious freedom --- leading education analyst Abdul Hameed Nayyar to observe that public schools under the SNC now teach more religious content than many madrassas do. Third, because the 18th Amendment devolved curriculum authority to the provinces, the federally driven SNC has met open resistance --- Sindh's provincial assembly formally rejected it in 2021 --- leaving a minority student's experience of the curriculum dependent on which province they live in.

c) Two 2025 audits show the pattern persists:

Two studies published in 2025 --- conducted independently, using different methodologies, on different sets of textbooks --- reach strikingly convergent conclusions, which is itself significant: it suggests the bias documented since the 2000s is a stable structural feature rather than a residue awaiting a final round of reform.

The **AFI--Weaving People to Grow Foundation** study reviewed Punjab primary-level textbooks (PCTB, current editions) using a methodology adapted from CSJ's. Its central finding is that Article 22(1) --- the constitutional guarantee that no student be required to receive religious instruction outside their own faith --- was violated in **51 separate instances** across the primary curriculum, almost entirely through Islamic content placed in Urdu, English, and general-knowledge books rather than confined to Islamiyat. It also documents specific distortion in interfaith material: a Grade 4 Ethics chapter on Judaism renders Moses as "Hazrat Musa" and names Pharaoh's wife by an Islamic rather than a Jewish source term, meaning a minority faith is taught to children through the majority faith's own vocabulary rather than its own. A Grade 3 Ethics chapter on "nature worship" describes Hindu, ancient Egyptian, and other traditions' reverence for fire, sun, and water in terms the researchers characterize as dismissive --- without the neutral or respectful framing given to comparable Islamic practices --- which the study argues teaches children early to regard other faiths as inferior. It further finds that martyrdom content highlights only Muslim soldiers, though it identifies several decorated non-Muslim servicemen absent from the curriculum, and that festival content in at least one Social Studies chapter names only Eid, excluding Easter, Diwali, Christmas, and Baisakhi. Notably, the study also credits a few chapters --- an English Grade 3 lesson naming Christmas, Holi, and both Eids --- as evidence that balanced treatment is achievable within the existing curriculum structure, not merely a theoretical fix.

The **IMPACT-se** review --- a larger audit of 86 government-approved textbooks across the Punjab, Sindh, and Federal boards, benchmarked against UNESCO tolerance standards --- adds a second axis largely absent from earlier Pakistani studies: the treatment of Judaism specifically. It finds that a textbook covering Hinduism, Christianity, Confucianism, and Taoism in comparative-religion chapters omits Judaism entirely, despite Pakistan's own small historic Jewish community (fewer than 200 people remain, with one synagogue, in Karachi) --- an omission the report calls an effective erasure. Where Jews do appear, it is almost exclusively through early Islamic history and in adversarial terms: Grade 5 and 6 Islamic Education textbooks describe Jewish tribes of Medina as having violated treaties "as usual," and a Grade 5 passage attributes to Jewish actors a role in Jesus's suffering --- a framing the report notes echoes the structure of the historical blood-libel trope. At the same time, the same textbooks contain sincere passages promoting

tolerance --- a Grade 7 Urdu lesson stating that no religion teaches hatred, a Grade 8 Ethics passage invoking a hadith on protecting the rights of religious minorities. This coexistence is analytically telling: the bias in Pakistan's curriculum is not uniform hostility but a selective, structural pattern --- present in the historical and comparative-religion material even while explicit tolerance-education content also exists --- which is part of why it survives successive reform efforts. It is deniable in a way that comprehensive hostility would not be.

d) What this looks like in the classroom:

Textbook content translates into daily social experience. A Hindu student from Sindh recalled classmates who, out of simple ignorance about religious diversity, mocked her, projected ideas about the afterlife onto her, and told her she would never enter heaven unless she converted to Islam. A Christian mother described discrimination following her children through something as basic as their names, to the point of considering relocating her family, or leaving Pakistan altogether, to spare her children the prejudice that intensifies in smaller cities. These accounts show the mechanism worth naming explicitly: curriculum bias does not stay in the textbook. It authorizes peer-level bullying and pressure to convert, and pushes minority families toward self-segregation or emigration as a private coping strategy in place of a public remedy.

e) Synthesis: Constitutional Guarantee versus Institutional Practice:

This pattern speaks directly to the report's central question: constitutional text (Article 22(1), meant to protect students from compulsory religious instruction outside their own faith) coexists with a curriculum apparatus that keeps failing to honor it --- through Zia-era legacy content never fully purged, uneven SNC implementation, provincial fragmentation, and a shortage of minority-faith teachers. The fact that independent researchers using different methods, a decade apart, keep finding the same structural pattern is itself evidence that this is not a transitional failure the SNC will eventually resolve, but a durable feature of how curriculum is produced in Pakistan. This is also a *hate-speech pipeline* issue: the textbook framings of Hindus, Christians, and Jews documented here feed directly into the wider religious discourse addressed in 3.3.

Citations for the reference list: AFI & Weaving People to Grow Foundation, *Inclusive Education for a United and Harmonious Pakistan* (Research Year 2024--2025); Ratnadeep Chakraborty (ed. Madeleine Ferris), *Review of Pakistani Textbooks*, IMPACT-se/Ronald S. Roadburg Foundation (August 2025) --- worth a footnote flagging IMPACT-se's institutional origin, as its textbook reviews across countries have drawn criticism for selective framing elsewhere, even though the excerpts it quotes here are independently checkable against the actual board textbooks; Centre for Social Justice, *What Are We Teaching at School?* (2023); Anjum James Paul, *Biased Pakistani Textbooks* (ITACEC); USCIRF, *Connecting the Dots: Education and Religious Discrimination in Pakistan*.

3.3 Madrassas, Religious Discourse and Hate Speech:

DOCUMENTED CONTENT

A widely used classical jurisprudence text instructs that it is mandatory for non-Muslims living under an Islamic state not to appear similar to Muslims in dress, animals for riding, or the right to bear arms — enforced differentiation intended to make their humiliation visible.

Section 3.2 showed how bias enters through the formal curriculum. This section turns to the wider religious discourse --- madrassa education, mosque sermons, and the online space where that discourse now travels fastest --- and to the specific institutional gap between what the law prohibits and what actually happens.

a) Scale, and a legal prohibition that exists mostly on paper:

Before examining what madrassas teach and what their clerics preach, the report must address a foundational problem: no one in Pakistan can say with confidence how many madrassas exist. This is not a minor data gap --- it is the starting point for understanding why every reform announced since 2001 has fallen short. You cannot register, regulate, or reform an institution you cannot count.

The figures available from official sources diverge sharply depending on who is asking and when. The Ministry of Religious Affairs and Interfaith Harmony, working in coordination with the umbrella body Ittehad-e-Tanzeemat-e-Madaris Pakistan (ITMP), recorded 26,131 madrassas in its registry --- broken down as 14,768 in Punjab, 7,118 in Sindh, 2,704 in Balochistan, 1,354 in Khyber Pakhtunkhwa, and 187 in Islamabad --- yet the same Ministry separately acknowledged thousands of *unregistered* institutions: 4,135 in KP alone, 2,411 in Punjab, 1,406 in Sindh, 266 in Balochistan, and 31 in Islamabad. ITMP itself, however, counts 35,377 registered seminaries schooling roughly 3.5 million children --- a figure nearly 10,000 higher than the Ministry's own number for the same category. When the Senate requested an official account in December 2024, the Law Minister presented a figure of 17,738 registered madrassas with 2,249,520 enrolled students, noting that no comprehensive data on unregistered institutions exists. The most recent DGRE portal data, as of May 2026, records 20,417 registered madrassas nationwide --- still a different number from all the above. In short, official figures for registered madrassas alone range from roughly 17,700 to over 35,000 depending on the source, the year, and the methodology. Estimates for the total --- registered and unregistered combined --- range from 26,000 to as high as 40,000, with some analysts suggesting the real figure may be higher still, since many institutions at the village and neighbourhood level operate entirely outside state documentation.

The provincial breakdown of the most recent formally verified parliamentary figures (DGRE/Ministry of Federal Education, December 2024) is as follows:

Province/Region	Madrassas Registered	Student Enrolled
Punjab	10,012	664065
Khyber Pakhtunkhwa	4,005	1283024
Sindh	2,416	188182
Balochistan	575	71815
Azad Jammu & Kashmir	445	26787
Islamabad Capital Territory	1 99	11301
Gilgit-Baltistan	86	4346
Total	17,738	2249520

Note that KP, with only 4,005 registered madrassas, accounts for over 1.28 million enrolled students --- by far the largest share --- while the DGRE's May 2026 portal shows a higher total of 20,417 registered institutions, reflecting ongoing registration activity since the December 2024 parliamentary report.

Three structural reasons explain why exact numbers remain elusive and are likely to remain so. First, the primary reason for non-registration is ideological: the NAP Tracker documented that the main reason madrassas refuse to register is differences with the government over curriculum and religious beliefs --- meaning the most problematic institutions are precisely the ones least likely to appear in any registry. Second, the registration authority has changed repeatedly: madrassas were previously registered under the Societies Act 1860, then that registration was prohibited under Benazir Bhutto in 1994, then a new Model Deeni Madrassa Ordinance was issued under Musharraf in 2001 and rejected by the five sectarian boards, and a 2019 MOU between the Ministry of Federal Education and ITMP established the DGRE as the sole national registration authority --- creating successive, incompatible registries with no clean handover of data. Third, NACTA's own former National Coordinator declared in June 2015 that the government had failed to determine the exact number of seminaries in the country --- an admission that had still not been resolved a decade later when the Law Minister made the same acknowledgement to the Senate in 2024.

What can be said with confidence is this: somewhere between 17,700 and 40,000 madrassas operate in Pakistan, enrolling between 2.2 and 3.5 million students, the majority of them concentrated in KP and Punjab, and a significant but uncounted proportion of them operating entirely outside the regulatory framework that is supposed to govern their curriculum and financing. The NAP Tracker's conclusion from

2016 remains accurate today: the registration, regulation, and reform of madrassas is treating the symptoms; until the state can provide free quality education, basic social services, and viable employment, the root cause driving families --- particularly poor families paying less than two dollars a day --- to send their children to seminaries will remain unaddressed, and the numbers will continue to grow.

The legal prohibition exists across at least three instruments --- the Societies Registration (Amendment) Act 2007, the Anti-Terrorism Act 1997, and NACTA's National Narrative --- but enforcement rests on a self-regulatory architecture in which the wafaqs police their own member institutions, audit reports are commissioned by the madrassas themselves, and no independent monitoring body has the mandate or capacity to verify curriculum content at scale. No independent study confirms systematic compliance with the prohibition on sectarian hatred in teaching materials; the available evidence --- from successive U.S. State Department reports, the NAP Tracker, and civil society monitoring --- consistently records continued teaching of extremist doctrine in an uncouneted proportion of the sector.

b) Two Decades of Reform Announcements, One Recurring Result:

Every government since Musharraf has announced a version of the same reform. The 2001 Model Deeni Madrasa Ordinance, the National Action Plan of 2014 adopted after the Peshawar school massacre, the 2019 MOU establishing the Directorate General of Religious Education, and the Societies Registration (Amendment) Act of 2024 all pursue identical stated goals: mandatory registration, financial audits, and an explicit legal bar on teaching or publishing literature that promotes militancy or sectarian hatred. Each round has met the same resistance and produced the same result.

The 2001 ordinance was rejected outright by the five wafaqs. The 2014 NAP made madrasa registration its Point 10; thirteen months later, NACTA's own National Coordinator publicly admitted the government had still not agreed on a basic data collection process. An attempt to reform curriculum content in 8,000 madrassas reportedly reached only a small fraction of that target, with the Ministry of Education itself acknowledging the failure. The 2019 DGRE framework, which was designed to make the federal Ministry of Education the sole registration authority, was partially undone by the 2024 Societies Registration Amendment, which permitted madrassas to register instead with provincial registrars --- bypassing the specialized federal authority the 2019 MOU had just established and reopening FATF compliance concerns in the process. Throughout all of this, the main madrasa coalition ITMP has resisted what it regards as state interference in religious education, and prominent politicians --- particularly in Punjab, the province with the largest number of unregistered seminaries --- have publicly declared there is no connection between madrassas and militancy, making serious regulatory action politically costly.

The structural reason for this recurring failure is worth naming precisely: the enforcement architecture rests on self-regulation. The wafaqs are expected to police their own member institutions, audit reports are commissioned by the madrassas themselves, and no independent body has the mandate or capacity to review curriculum content at scale. The most problematic institutions are also the least likely to register voluntarily --- meaning the oversight framework, to the extent it functions at all, applies most reliably to the institutions that need it least.

Two decades of reform announcements therefore raise a practical question this report must answer: if registration and curriculum oversight have consistently failed, what content has been left in the classroom? The following subsection addresses that question directly, drawing on the only two studies that have come close to a systematic audit of madrasa teaching materials.

b.1) What Madrasa Textbooks Actually Teach: Evidence from the Classroom

The answer to that question is documented by two studies: USCIRF's *Connecting the Dots* (2011) and Nadeem Malik's peer-reviewed fieldwork published in the *Journal of Education Policy* in 2025. Together they provide the closest available equivalent to a textbook audit for the madrasa sector --- combining direct classroom observation with analysis of actual teaching materials in use. Both were conducted independently, a decade apart, using different methods. Their findings are consistent.

Non-Muslims as a legal category, not as citizens. Malik spent six weeks immersed in eight Lahore madrassas --- covering Deobandi, Barelvi, Ahl-i-Hadith, and Shia institutions --- observing classes and interviewing teachers. He identified **Al-Hadaya** (The Guidance), a classical Islamic jurisprudence text published in its current edition by Ahamd Publications, Lahore (2019), as a widely used teaching text. Its content on non-Muslims is not historical commentary or theological abstraction --- it is prescriptive instruction. The text states that it is mandatory for **dhimmis** (non-Muslims living under an Islamic state) not to appear similar to Muslims in any aspect of life, including dress, animals for riding, and the right to bear arms. The rationale given is explicit: this enforced differentiation exists to make the humiliation of non-Muslims visible. Non-Muslims are not to be greeted first, their movement through public spaces may be obstructed, and they must wear rough rather than fine clothing --- treating them equally to Muslims is described in the text as illegitimate. This is not a manuscript in a library archive. It is a commercially published, currently available title sold in Lahore's book market and, as Malik's observation confirmed, taught as part of religious instruction in active classrooms.

The USCIRF study reaches a parallel conclusion from its own fieldwork across 37 schools and 226 madrasa students and teachers: non-Muslims are generally portrayed in madrasa textbooks in one of three ways --- as kafirs (infidels) or mushrakeen (pagans), as dhimmis (non-Muslims living under Islamic rule), or as murtids (apostates) --- and are never described as citizens with the constitutionally protected rights which accompany citizenship. The *dhimmi* framework documented in *Al-Hadaya* is therefore not an isolated text in a single institution --- it is a consistent theological-legal category applied to non-Muslims across the madrasa curriculum, and one that is structurally irreconcilable with Articles 25 and 27 of the Constitution, which prohibit discrimination on grounds of religion and guarantee equal rights of citizenship to all Pakistanis regardless of faith.

Violence introduced at the point of literacy. Beyond jurisprudence texts, Malik documents a finding with particularly serious implications: a Urdu-language primer published by Iqra Publishers and widely used in madrassas to teach the Urdu alphabet to young children employs vocabulary such as *bandoq* (gun), *khanjar* (dagger), and *Jihad* (war) as its teaching words. The associations between violence and religious identity are not being introduced in theology classes to older students capable of critical engagement --- they are being embedded at the point of basic literacy acquisition, before a child can read a complete sentence or distinguish between a descriptive word and an obligation. This is directly relevant to central question of the feature report, the attitudes toward minorities that surface in adult mob violence do not

appear spontaneously. They are shaped through years of institutional instruction beginning at an age when the cognitive capacity to question that instruction does not yet exist.

What teachers believe tells us what the curriculum has produced. Malik's teacher interviews provide a parallel evidence stream --- what teachers believe after years inside this system is a proxy for its cumulative outcomes. All madrassah teachers in his study exhibited lower tolerance toward religious minorities than their government school counterparts. They frequently attributed blasphemy accusations to minorities and advocated for harsh punishments in such cases. They unanimously opposed the inclusion of minorities in positions of civil or military authority. Their views on Ahmadis were, in Malik's own characterization, notably harsh. Particularly significant for this report's later section on political marginalisation is their unanimous position that non-Muslims should not hold the office of Prime Minister --- a view that mirrors the constitutional exclusion documented in Part 2.2, creating a closed ideological loop between state law and religious education: the Constitution excludes non-Muslims from the highest offices, the curriculum teaches that this exclusion is religiously correct, and the teacher transmits both as settled fact.

Two necessary caveats. Malik's fieldwork covers eight madrassas in one city and cannot be taken as representative of Pakistan's entire seminary sector of 17,000 to 40,000 institutions. The *Al-Hadaya* text, however, carries a different and stronger evidentiary status: it is not fieldwork testimony but a commercially published, nationally available title that no regulatory body has moved to restrict. Whatever its prevalence in individual madrassas, the fact of its publication and sale is independently verifiable. Second --- and this point deserves emphasis rather than suppression --- Malik himself notes, echoing the SDPI's earlier *Subtle Subversion* finding, that government school textbooks reach far more children than madrassas and in some respects carry comparably damaging content. This observation correctly prevents the analysis from becoming a simple "madrassa problem" narrative and locates the issue where your report has consistently placed it: in the broader state educational ideology that shapes both systems rather than in a parallel sector operating in isolation from the mainstream.

c) From Theological Belief to Organized Persecution by State:

The persecution of the Ahmadiyya community in Pakistan is not incidental or spontaneous. It is the product of a legal framework constructed by the state, enforced by organized religious movements, and --- as documented extensively in 2025 --- actively facilitated by state institutions whose constitutional obligation is to protect all citizens equally regardless of religious identity.

The legal foundation of persecution. Since the Second Constitutional Amendment of 1974, which declared Ahmadis non-Muslim as a matter of state law, and since Ordinance XX of 1984, which criminalized Ahmadis from self-identifying as Muslim, calling their places of worship mosques, using Islamic terminology, or performing Islamic rites, the Pakistani state has constructed a legal architecture that places one community outside the framework of equal citizenship. Pakistan's Ahmadiyya community faces persecution from the cradle to the grave --- at every step of their lives they remain at risk of arrest, attack, or harassment. Ahmadis have been denied their fundamental right to vote, they cannot possess their religious texts, and even after death their graves are desecrated. This legal framework does not merely fail to protect Ahmadis --- it actively provides the cover under which organized religious groups operate against them with effective impunity.

The two principal organized actors --- and the state's response to them. Two organizations have been primarily responsible for converting this legal framework into ground-level persecution: Aalmi Majlis Tahaffuz Khatm-e-Nabuwwat (AMTKN) and Tehreek-e-Labbaik Pakistan (TLP). They operate through different but complementary mechanisms. AMTKN functions primarily as an organized civil and employment pressure network --- monitoring Ahmadi civic participation, issuing formal demands to state institutions, and publicly celebrating compliance with those demands. TLP operates as the primary instrument of physical mobilization --- organizing mosque demolitions, mass arrests of worshippers, and mob violence against Ahmadi communities, frequently in explicit coordination with or with the facilitation of local law enforcement.

The state's own relationship with TLP is a significant indicator of institutional failure. The Government of Pakistan proscribed TLP under anti-terrorism legislation, formally recognizing it as a threat to public order. Yet across 2025, TLP chapters continued to operate openly, organize campaigns against Ahmadi mosques and worshippers, and receive effective facilitation from local police rather than enforcement of the proscription against them. A ban that exists on paper but is not enforced on the ground is not a remedy --- it is evidence of the same enforcement gap this report identifies across multiple legal domains.

A documented case: organized pressure overriding constitutional protection. The case of Naghman Ahmad, an Ahmadi civil servant appointed as Assistant Director Land Records in Lalian, Chiniot district, Punjab, illustrates with unusual precision the mechanism by which organized religious pressure converts into state action in violation of constitutional guarantees. Shortly after his appointment, the Chiniot and Chinar chapters of AMTKN issued formal written notices declaring the appointment unacceptable on the sole basis of the officer's Ahmadi identity, using the derogatory term "Qadiani" throughout, and invoking the supposed religious sensitivities of the local population as grounds for demanding his removal. The Punjab Land Records Authority complied: Naghman Ahmad was transferred. AMTKN then published celebratory propaganda --- reproducing the official PLRA transfer notification alongside the image of the organization's leader credited with the campaign --- under the heading *Aashiqan-e-Khatm-e-Nabuwwat ko Mubarak Baad* (Congratulations to the devotees of the Finality of Prophethood).

Three dimensions of this case merit particular attention. First, the sole basis for the pressure campaign was the officer's religious identity --- not any question of professional competence, conduct, or administrative concern. Second, the state institution complied without any recorded legal challenge or objection, thereby accepting the principle that religious identity constitutes a valid ground for personnel decisions in the civil service. Third, AMTKN's public advertisement of its success serves a governance function in its own right: it instructs future state officials that compliance is expected and will be celebrated, while demonstrating to every Ahmadi civil servant in Pakistan that merit-based appointment does not confer protection from organized religious intimidation. This mechanism operates in direct and documented violation of Article 27 of the Constitution, which states that no citizen otherwise qualified for appointment in the service of Pakistan shall be discriminated against on grounds of religion, caste, sex, residence, or place of birth.

The scale of persecution in 2025: a pattern of escalation documented by multiple sources. In the past year alone, the Ahmadiyya community has endured numerous human rights violations, including killings, deaths in custody, and arbitrary detention, alongside the demolition of a historic 100-year-old mosque in Daska, the

closure of a mosque in Malir, Karachi, the destruction of minarets in Bahawalnagar, the desecration of at least 82 Ahmadi graves in Kotli, Azad Kashmir, mass arrests of minors and persons with disabilities in Sargodha, Daska, and Pasrur, and violent attacks during Eid celebrations in Azizabad, Karachi, during which mosques were vandalised.

The chronological record compiled from parliamentary testimony and civil society monitoring for 2025 documents a pattern of incidents that accelerated rather than stabilized across the year: on 16 January, a 100-year-old Ahmadiyya mosque in Daska --- built by Sir Muhammad Zafrullah Khan, Pakistan's first Foreign Minister and former President of the UN General Assembly, himself an Ahmadi --- was demolished under TLP pressure. On 28 February, dozens of Ahmadis were arrested in mass operations across Sargodha and Daska, including minors and persons with disabilities. On 7 March, a mosque closure in Karachi resulted in six arrests and 25 persons charged. On 14 March, twenty-nine Ahmadis were arrested in Pasrur for the act of congregational prayer. On 18 April, Laiq Ahmed Cheema, father of seven, was beaten to death on his way to Friday prayers in a high-security area of Karachi. On 24 April, Muhammad Asif, a 19-year-old student, was shot dead by extremists in Kasur while riding his bicycle. On 11 May, Tahir Mahmood, aged 71, died in Karachi Prison after being imprisoned for offering Friday prayers --- denied medical care, beaten, and tortured before his death. On 15 May, Dr. Sheikh Mahmood, a 58-year-old gastroenterologist, was assassinated by a disguised assailant inside his hospital in Sargodha.

As many as 269 Ahmadiyya graves were desecrated in Pakistan by July 2025, while more than 50 mosques had been desecrated since 2023. At least three Ahmadiyyas were murdered by extremists in 2025, compared to six in 2024. The IHRC's comprehensive report covering June 2024 to December 2025 documented over eighty major incidents in eighteen months --- more than two hundred graves desecrated, dozens of mosques sealed or demolished, worshippers arrested for praying, doctors assassinated in their clinics, and a man sentenced to life imprisonment for memorising the Qur'an.

The pattern of direct state participation is equally documented. Police facilitated the destruction of minarets and prayer niches in at least five Ahmadi mosques; in one case, police officials returned to a mosque established in 1904 and removed its minaret using a grinder, subsequently indicating plans to demolish the remaining minarets. Ahmadiyyas in some areas were compelled to sign affidavits stating they would not perform Eid rituals, with failure to comply subject to a fine of PKR 500,000. The Pakistan Telecommunication Authority blocked websites containing Ahmadiyya content, PEMRA imposed restrictions on broadcasting Ahmadiyya channels, and the education department created institutional obstacles for schools and institutions run by Ahmadiyyas. Shockingly, law enforcement agencies were found to have participated in the repression rather than protecting the rights of the minority community --- including on 14 August 2025, Pakistan's Independence Day, when Ahmadiyyas in Faisalabad were attacked by a mob that threw stones at their houses, beat several with sticks and bricks, and set two Ahmadiyya mosques on fire.

The response of the international community. UN human rights experts called on the Government of Pakistan to take concrete measures to prevent extrajudicial killings, arbitrary arrests, and attacks against places of worship and cemeteries, stating that these violations demonstrate widespread hostility towards Ahmadis in Pakistan exacerbated by hate speech and incitement to violence by political and religious figures. The experts specifically demanded that Pakistan must break the pattern of impunity that has allowed

perpetrators of attacks and incitement to hatred and violence to act without restraint. Testimony submitted to the United States Congressional Human Rights Commission in July 2025 described the situation as a deeply disturbing escalation, noting that a group of independent UN experts had expressed grave concern regarding a reported upsurge in discrimination and violence against Ahmadi Muslims in Pakistan, including extrajudicial killings, arbitrary arrests and detentions.

The constitutional contradiction at the core. When a Pakistani citizen is arrested for offering Friday prayers, when a civil servant is transferred because a religious organization objects to his faith, when a century-old mosque is demolished by police under extremist pressure, and when the state's regulatory authorities block the community's communications --- these are not individual failures of law enforcement. They reflect a constitutional architecture that has placed one community outside the framework of equal citizenship, and a political culture in which organized religious pressure --- even by an organization the state itself has formally proscribed --- can override the constitutional protections that formally remain on the books. The Lalian case makes this visible with particular clarity: Article 27 prohibits religious discrimination in civil service appointments; the PLRA violated it in direct response to AMTKN pressure; no legal remedy followed. The formal protection existed. The substantive equality did not.

c.1) Religious Political Parties as Incitement Actors: TLP, AMTKN, and the Limits of State Response

The persecution of religious minorities documented in this report does not occur without organized political agency. Two entities have driven the most sustained ground-level campaigns against minorities --- particularly the Ahmadiyya community: Tehreek-e-Labbaik Pakistan (TLP) and Aalmi Majlis Tahaffuz Khatm-e-Nabuwat (AMTKN). They operate through complementary mechanisms: AMTKN as an organized civil and employment pressure network, as documented in the Lalian land records case in subsection c), and TLP as the primary instrument of physical mobilization --- orchestrating mosque demolitions, mass arrests of worshippers, and mob violence, frequently with the facilitation rather than the resistance of local law enforcement.

TLP: origin and the political economy of extremism. TLP was founded in 2015 by Khadim Hussain Rizvi, now led by his son Saad Rizvi, and emerged from the Bareilvi tradition of Sunni Islam. It built its organizational power through street-level mobilization, mass sit-ins, and highway blockades, with Pakistan's blasphemy laws as its central political instrument. From its inception, TLP entered public prominence by openly celebrating Mumtaz Qadri, the killer of Punjab Governor Salman Taseer --- demonstrating from the outset that the organization stood for extremism and a rejection of the rule of law. Despite this, TLP secured nearly 2.9 million votes in the 2024 general election, becoming the fourth largest party in Pakistan --- a measure of the degree to which its ideology resonates with a substantial segment of the electorate and the political leverage this gives it against successive governments.

The Faizabad Dharna and judicial accountability. The depth of TLP's relationship with elements of the state apparatus was exposed with particular clarity by the 2017 Faizabad sit-in, when TLP paralyzed Islamabad and Rawalpindi for twenty days. When the sit-in ended, Punjab Rangers Director General Maj Gen Azhar Naveed Hayat distributed cash envelopes --- reportedly Rs 1,000 each --- among the protesters to fund their return home, in footage that went viral on social media. The agreement to end the dharna was signed by Maj Gen

Faiz Hameed --- then head of counter-intelligence at the ISI --- in the capacity of "guarantor," making a serving military intelligence officer a formal party to a negotiated settlement with a religious extremist organization.

The Supreme Court took suo motu notice and in a landmark judgment on 6 February 2019, authored by then-Justice Qazi Faez Isa, delivered findings of constitutional significance. The judgment noted that when protest participants received cash handouts from men in uniform, the perception of their involvement gained traction, and stated explicitly that the involvement of ISI and members of the Armed Forces in politics, media and other unlawful activities should have stopped following the Air Marshal Asghar Khan case. Justice Isa declared the agreement brokered by the armed forces that ended the protest illegal and unconstitutional, questioned the dubious role of state agencies including the ISI in failing to counter the threat of extremism, and directed the Ministry of Defence and chiefs of the armed forces to initiate action against personnel found to have violated their oath. The court further directed federal and provincial governments to monitor and prosecute those advocating hate, extremism, and terrorism, and ordered all intelligence agencies to operate within their constitutional mandates. The judgment was one of the most significant judicial interventions on the boundaries of military conduct in Pakistan's constitutional history.

The state's response to this judgment is itself evidence of the impunity the report identifies throughout: the ISI filed a review petition against the verdict, arguing that the court's observations would gather the impression that the armed forces were responsible for unconstitutional acts. The inquiry commission later established to implement the judgment gave a clean chit to General Faiz Hameed, with the finding that no state actor could be formally implicated without official accusations from the government officials who had been present --- none of whom were willing to name the agencies on record. When the commission's report was submitted in 2024, Chief Justice Qazi Faez Isa expressed dismay, calling the report disappointing and questioning how an institution as well-resourced as the army had become "sacred" from accountability.

The October 2025 ban: accountability deferred. The Government of Pakistan banned TLP under the Anti-Terrorism Act on 24 October 2025 --- the second such ban, the first having been imposed in April 2021 and lifted just months later after the government negotiated a deal to end TLP's march on Islamabad. The 2025 ban was triggered by violent clashes during a pro-Palestinian protest march, not by the months of documented anti-Ahmadi violence that had preceded it throughout the year. This sequencing confirms what the Faizabad precedent had already shown: the threshold for decisive state action against organized religious extremism is set by the threat posed to state authority, not by the scale of harm inflicted on minority communities. A senior PML-N leader acknowledged publicly that TLP had been created partly to cut into rival parties' vote banks --- confirming that the persecution of minorities was a byproduct of political calculation rather than an oversight. Despite the ban, TLP's political registration and its lawmaker's seat in the Punjab Assembly remained intact, and analysts noted that banning the party would be more symbolic than transformative without deeper structural reforms.

What the pattern shows. Taken together, TLP and AMTKN illustrate a closed circuit of state complicity: organized religious pressure campaigns against minorities are permitted to operate; when they involve the military establishment they attract judicial censure but escape accountability; electoral leverage ensures that even formal bans are reversed or remain unenforced; and minority communities bear the cumulative

cost of political arrangements in which they have no voice. The Faizabad judgment remains, as of the time of writing, the most authoritative judicial statement on this dynamic --- and its non-implementation remains the most authoritative evidence that the problem is structural.

d) From Sermon to Mob: The Mosque Loudspeaker as an Incitement Tool:

On 16 August 2023 --- two days after Pakistan's Independence Day --- one of the most destructive attacks on a religious minority community in the country's recent history took place in Jaranwala, a town in Faisalabad district, Punjab. The triggering event was a blasphemy accusation: torn pages of the Quran were found in a Christian settlement, and a local man named Yasin Machhi used the loudspeaker of a nearby mosque to announce that a Christian had insulted the Quran, calling people to the streets to avenge the alleged desecration. No investigation was conducted, no legal procedure was initiated, and no police intervention occurred. Within hours, mobs drawn from Jaranwala and surrounding villages within a 50-kilometre radius converged on the Christian settlement, carrying iron rods, sticks, knives, and daggers. Over the course of more than ten hours --- during which police were present at the scene but did not intervene --- at least 26 churches were burned or vandalized, approximately 80 Christian homes were destroyed, a Christian cemetery was desecrated, and an estimated 20,000 Christians were displaced, many taking shelter in fields and in neighbouring districts. TLP was identified by residents and community investigators as a major force behind the mass mobilization.

The blasphemy accusation was subsequently found by police investigation to be entirely fabricated. The alleged desecration had been staged by Pervez Masih, a community member who planted torn Quran pages near the home of a man he suspected of an affair with his wife --- using the certainty of mob violence as a personal weapon. The individual who made the inciting announcement from the mosque loudspeaker, Yasin Machhi, was arrested but later released on bail. More than 90% of the suspects in the attack remained at large one year after the incident, according to information obtained by Amnesty International through a Right to Information request to the Faisalabad City Police Office. By August 2025 --- two years after the attack --- none of the accused had been sentenced by the Faisalabad Anti-Terrorism Court, and police investigations had declared all nominated accused persons innocent.

The Human Rights Commission of Pakistan placed Jaranwala in its historical context directly: the incidents replicate a pattern that has recurred at Shanti Nagar in 1997, Sangla Hill in 2005, and Gojra and Korian in 2009, among numerous other incidents in which mobs gathered following provocative announcements of alleged blasphemy, usually emanating from mosques or centres run by organized Islamic religious groups. The failure of police and administration to stop mob violence has been a recurring concern for the human rights community in Pakistan. The HRCP further stated that impunity for spreading religious hatred against non-Muslim communities and for inciting violence has encouraged religiously motivated groups to organize and orchestrate situations such as those witnessed in Jaranwala.

The Jaranwala case crystallizes the mechanism this section has documented throughout: an unverified allegation, a mosque loudspeaker, a named individual who faced no sustained legal consequence, a crowd mobilized within hours across a wide geographic area, police inaction for ten hours, and near-total impunity two years on. Each element reflects a systemic failure --- not a spontaneous one.

e) Social media as an accelerant, not just a mirror:

Recent reporting suggests the discourse-to-violence pipeline has partly migrated online, where it moves faster and is harder to trace to a specific speaker. Blasphemy accusations in particular are increasingly levied on social media or WhatsApp groups, where mere accusations or rumors are often enough to incite mob violence before any verification takes place --- as in a February 2024 case where a woman wearing a kurta with Arabic calligraphy narrowly escaped a mob of roughly 300 people at a Lahore restaurant over a false claim that her clothing bore Quranic script. The case is instructive precisely because it was resolved quickly once a female police officer intervened and religious scholars confirmed the text was ordinary Arabic calligraphy, not scripture --- proof that verification was available and fast, but arrived only after a mob had already formed, not before.

f) Synthesis: an unregulated discourse ecosystem, not isolated incidents:

Taken together, this section shows that "hate speech" in the Pakistani context is not a matter of a few extremist outliers but an ecosystem with several reinforcing channels: an under-registered madrassa sector operating largely outside the oversight the law itself requires; state officials mostly lending legitimacy to explicitly anti-Ahmadi platforms; Religious extremism preaching tradition with roots in 1980s militarization that has never been fully dismantled; and a social-media layer that now accelerates unverified accusations into physical mobs within hours. Every one of Pakistan's stated remedies --- the wafaq registration system, the National Action Plan, the Directorate General of Religious Education, the 2024 Societies Registration amendment --- targets exactly this ecosystem on paper. The recurring finding across two decades of reform attempts is not that the remedies are poorly designed, but that none has been implemented at the scale or with the sustained political will the problem requires.

3.4 Blasphemy Laws, Accusations and Mob Violence:

BY THE NUMBERS

Blasphemy accusations more than doubled in two years, rising from 171 in 2022 to 344 in 2024. Christians make up roughly 1.6% of Pakistan's population but 11% of cumulative accusations since 1987; Ahmadis make up 1–2% of the population but 30% of cumulative accusations.

a) The Legal Framework: Colonial Origins, Zia-Era Expansion

Pakistan's blasphemy laws did not originate in the Islamic republic --- they have their roots in British colonial legislation designed to reduce intercommunal violence by criminalizing acts calculated to incite religious conflict. What the colonial administration constructed as a public-order measure was progressively transformed, particularly during the Islamization program of General Zia-ul-Haq in the 1980s, into a theological enforcement mechanism that places the content of religious belief within the reach of criminal law. The penal code as it now stands contains several provisions of direct relevance to this report:

Section 295-B criminalizes defiling the Quran, carrying a mandatory punishment of life imprisonment. Section 295-C criminalizes defiling the name of the Prophet Muhammad (PBUH), carrying a mandatory

death sentence or life imprisonment. Section 298-A extends criminal sanction to derogatory remarks about Islamic religious figures, punishable by up to ten years' imprisonment. Sections 298-B and 298-C are specifically directed at the Ahmadiyya community, criminalizing Ahmadis from calling themselves Muslim, using Islamic terminology, referring to their places of worship as mosques, or performing Islamic rites --- provisions that criminalize the practice of a religious identity rather than any specific act.

Three structural features of this legal framework generate the human rights consequences documented in this section. First, no requirement of intent is specified in Section 295-C, meaning that an accusation is sufficient to trigger arrest and prosecution regardless of the accused's state of mind. Second, the law contains no safeguard against false accusation --- a deficiency that, as documented below, has been systematically exploited. Third, the procedure itself creates conditions for mob violence before any judicial determination is made: once an accusation is filed, the accused is publicly known, immediately vulnerable to extrajudicial attack, and faces a court environment in which judges have demonstrably failed to apply basic evidentiary standards out of fear of violent retaliation.

b) The Scale of Accusation: Record Numbers, Rising Trend

The Centre for Social Justice (CSJ) recorded a record 344 new blasphemy cases in Pakistan in 2024, up from 329 in 2023 and 171 in 2022 --- more than a doubling in two years. Human Rights Watch, using a different methodology that includes informally registered cases, puts the 2024 figure at a minimum of 475. Both figures confirm the same directional finding: the blatant weaponization of blasphemy laws continued to enable persecution, religious intolerance and widespread human rights violations.

The 38-year cumulative record (1987--2024) compiled by CSJ provides a longer-term picture: at least 2,793 persons were formally or informally accused of blasphemy over this period, of whom 54% were Muslims, 30% were Ahmadis, 11% were Christians, and 3% were Hindus. The 2024 annual breakdown shows a shift in the composition of accusations: 70% of the 344 accused were Muslims, 14% Ahmadis, 9% Hindus, and 6% Christians.

Two observations on these figures are necessary for this report's analysis. First, the fact that Muslims constitute the majority of those accused does not diminish the disproportionate impact on minorities --- when measured as a proportion of their share of the population, minority communities are dramatically over-represented. Christians constitute approximately 1.6% of Pakistan's population but 11% of cumulative blasphemy accusations over 38 years; Ahmadis constitute roughly 1-2% of the population but 30% of cumulative accusations. Second, and as HRW documented in its June 2025 report, a significant proportion of accusations are fabricated: blasphemy laws have been systematically used as instruments of blackmail and land-grabbing, with human rights lawyers exposing an organized "blasphemy business group" that has entrapped more than 450 people in fabricated cases in recent years, including five who died from torture while in custody.

c) The Gap Between Accusation and Justice: Structural Failure of Due Process

DOCUMENTED CASE

Human rights lawyer Rashid Rehman was shot dead in his office after defending a client accused of blasphemy. His killers were never identified or prosecuted — he was the first lawyer killed in Pakistan for taking on a blasphemy case.

The formal legal process offers theoretical protections that, in practice, consistently fail to reach blasphemy defendants. Lower courts have often failed to adhere to basic evidentiary standards in blasphemy cases, which civil society groups and lawyers ascribe to fear of retaliation from religious groups if they acquit blasphemy defendants. Most convicted persons spend years in jail before higher courts eventually overturn their convictions or order their release. The atmosphere of intimidation reaches every actor in the courtroom --- not only the accused but also those responsible for administering justice.

The risk to defence lawyers in blasphemy cases is documented and extreme. The clearest case is that of **Rashid Rehman**, a prominent human rights lawyer and regional coordinator of the Human Rights Commission of Pakistan in Multan. In December 2013, Rehman agreed to defend Junaid Hafeez, a lecturer at Bahauddin Zakariya University who had been charged with blasphemy over Facebook posts. On 9 April 2014, three persons --- including Advocate Zulfiqar Sindhu --- threatened Rehman in open court inside Multan Central Prison during a hearing, saying: "You will not come to court next time because you will not exist anymore." Despite the threats being made in front of the presiding judge, the judge remained silent and took no action. Rehman and his co-counsel reported the threats formally to the Punjab government, the Inspector General of Police, and the District Bar Association. No protection was provided. On 7 May 2014, two gunmen entered Rehman's office at the HRCP building on Kutchery Road, Multan, posing as prospective clients, and shot him dead. He was hit by five bullets. His colleague Nadeem Parvaz and a client were also shot and injured. The killers escaped and were never identified or prosecuted. The murder of Rashid Rehman --- the first time a lawyer had been killed in Pakistan for taking on a blasphemy case --- was followed by Junaid Hafeez spending years in solitary confinement, with at least seven judges transferred through his case due to security concerns, before being sentenced to death in December 2019 after a six-year trial held inside a prison rather than a public court.

The risk to judges who acquit is equally documented and equally unpunished. In early 1995, a Lahore High Court bench comprising **Justice Arif Iqbal Bhatti** and Justice Khurshid Ahmed acquitted Salamat Masih --- a young Christian boy accused of blasphemy --- overturning a lower court death sentence. Salamat and Rehmat Masih were immediately and secretly transported to Germany, as returning home was regarded as certain death. Justice Arif Iqbal Bhatti was subsequently assassinated in October 1997. Justice Khurshid Ahmed was forced into early retirement. Asma Jahangir, who had served as amicus curiae in the case, received death threats and survived an assassination attempt in 1996. Not one perpetrator of Justice Bhatti's murder was brought to justice. The message delivered by his killing --- and by the impunity that followed it --- has shaped judicial behaviour in blasphemy cases ever since.

The consequences for defendants who survive to acquittal are no less severe. When the Supreme Court of Pakistan acquitted Asia Bibi --- a Christian woman who had spent nearly a decade on death row --- in October 2018, TLP organized nationwide protests demanding her public execution and calling for the deaths of the

three judges who had signed the acquittal. Asia Bibi's defence lawyer, Saiful Malook, fled Pakistan immediately following the acquittal, stating he could no longer remain in the country because followers of TLP had threatened to kill him as well as the judges. He departed via Rome to Amsterdam before relocating to London. Asia Bibi herself left Pakistan covertly months later, relocating to Canada. The Supreme Court's Chief Justice at the time had received death threats before delivering the verdict. The consistent outcome --- accused persons imprisoned for years, lawyers who defend them murdered or forced into exile, judges who acquit them assassinated or threatened --- is not a series of isolated tragedies. It is a pattern that operates as an extrajudicial enforcement system, ensuring that even formal legal vindication carries a cost that the state consistently refuses to protect anyone from bearing.

d) Extrajudicial Violence and the Failure of State Protection

At least 104 persons were killed extrajudicially following blasphemy allegations between 1994 and 2024 --- 67 Muslims (64%), 26 Christians (25%), seven Ahmadis, one Hindu, and one Buddhist. Punjab accounted for 72 of these killings (69% of the total). These are documented extrajudicial killings; the actual number, including those who died from injuries or in custody, is almost certainly higher. (the Annual Human Rights Observer report issued by Center for Social Justice (CSJ)).

In 2024, mob and vigilante attacks on people accused of blasphemy killed at least four people; the government failed to hold perpetrators accountable. In June 2024, a mob lynched a 36-year-old man in Swat after accusing him of blasphemy --- local police failed to intervene. In two separate incidents in Umerkot and Quetta in September 2024, police fatally shot two men accused of blasphemy. This last detail --- police as extrajudicial executors rather than protectors --- is one of the most serious findings in HRW's recent reporting and appears to have escaped sustained accountability entirely.

The pattern of violence extends beyond the individual accused. As Jaranwala demonstrated and as HRCF documented across multiple historical precedents, blasphemy accusations function as a triggering mechanism for collective punishment of entire minority communities --- in which churches, temples, and homes bear the consequences of an accusation made against one or two individuals. The accused is the legal pretext; the community is the actual target.

e) Blasphemy as a Weapon: Personal Disputes, Land Disputes, and Organized Entrapment:

Sustained research by HRW, CSJ, and independent legal practitioners in Pakistan has established that a substantial proportion of blasphemy accusations have no basis in genuine religious grievance. Research conducted between May 2024 and January 2025 in the Lahore, Gujranwala, Kasur, Sheikhupura, and Islamabad districts documented how blasphemy laws are deployed to resolve property disputes, settle personal vendettas, intimidate business competitors, and extort money. The Jaranwala accusation --- which police investigation revealed to have been entirely fabricated from a personal dispute --- is not unusual. It is representative of a pattern in which the severity of the legal and social consequences makes the blasphemy accusation an instrument of extraordinary destructive power, available to anyone willing to make it.

A January 2025 report by human rights lawyers Usman Warraich, Imaan Hazir-Mazari, and Rana Abdul Hameed exposed an organized Islamist network that has entrapped more than 450 people in fabricated

blasphemy cases, including five who died from torture while in custody. This group reportedly operates with the collusion of certain law enforcement officials, who benefit financially from the registration of cases. The existence of an organized entrapment enterprise of this scale --- operating with documented law enforcement complicity --- raises the nature of the problem beyond individual abuse to structural corruption of the legal system itself.

f) Lawyers, Judges, and the Shrinking Space for Due Process:

The human rights impact of blasphemy law extends to those who seek to administer it with professional integrity. Defence lawyers in blasphemy cases face death threats, professional ostracism, and --- in several documented cases --- assassination. Judges who acquit blasphemy defendants risk mob violence against their courts and families. The US State Department has noted consistently that this threat environment has produced a judicial culture in which lower courts routinely convict even where evidence is weak, relying on higher courts to eventually correct the error --- a process that takes years and leaves the accused imprisoned throughout. The Supreme Court's 2019 acquittal of Asia Bibi, a Christian woman who had spent nearly a decade on death row on a false accusation, triggered riots, a weeks-long siege of Islamabad by TLP, and required her to flee Pakistan --- illustrating that even a favourable Supreme Court ruling does not neutralize the social consequences of a blasphemy accusation.

g) International Response and Pakistan's Obligations:

USCIRF has recommended Pakistan's designation as a Country of Particular Concern every year since 2018; the US State Department redesignated Pakistan as a CPC in 2024. The European Parliament passed a resolution in April 2024 calling on Pakistan to repeal its blasphemy laws and protect religious minorities. Multiple UN human rights treaty bodies --- including the Human Rights Committee under the ICCPR and the Committee on the Elimination of Racial Discrimination --- have raised blasphemy law concerns with Pakistan in periodic reviews, noting incompatibility with Articles 18, 19, and 26 of the ICCPR.

Pakistan's stated position --- that blasphemy laws are necessary to protect religious sentiment and that they are not applied against minorities disproportionately --- is contradicted by its own Centre for Social Justice's data, by the US State Department's consistent documentation of due process failures, and by the pattern of extrajudicial violence that follows accusation regardless of any judicial outcome. The gap between Pakistan's ICCPR obligations and the operation of its blasphemy framework is not marginal or transitional --- it is structural, documented over decades, and has resisted reform primarily because the political cost of challenging TLP and its allies exceeds the political cost of leaving minority communities unprotected.

h) Synthesis

Blasphemy law in Pakistan functions as a system with multiple components that reinforce each other: a legal framework without intent requirements or anti-false-accusation safeguards; a judicial culture shaped by fear of violent retaliation; organized networks that weaponize accusations for personal gain; political parties whose core platform is the defence of those laws; a state apparatus that has alternately facilitated and failed to contain mob violence; and an international accountability regime that has produced condemnation but not reform. For religious minorities --- Christians, Ahmadis, Hindus, and Sikhs --- the blasphemy accusation is

not simply a legal risk. It is an instrument of social control whose mere invocation can destroy a family, displace a community, and end a life before any court has reached any finding.

3.5 Forced Conversion and Marriage: Religion, Gender and Economic Vulnerability:

BY THE NUMBERS

At least 421 cases of abduction and forced conversion of minority girls and women were reported between January 2021 and December 2024. Seventy-one percent of victims were minors; 22% were under the age of 14.

a) The Nature of the Practice:

Forced conversion in Pakistan is not a uniform phenomenon. It takes several overlapping forms: the abduction of a girl followed by a declaration of conversion at a local mosque or shrine, then an immediate marriage to the abductor; the use of debt or feudal economic dependency to coerce conversion; the exploitation of child marriage laws to override age protections by producing fraudulent conversion documents that alter a girl's legal status; and the use of existing relationships --- employers, neighbours, classmates --- as vectors of exploitation. What these forms share is a triangular structure: a minority community's social vulnerability, a religious-legal framework that treats a declared conversion as an overriding fact regardless of how it was obtained, and a state apparatus --- police, courts, local administration --- that consistently declines to intervene effectively on behalf of the victim.

The practice targets primarily women and girls from two communities: Hindu girls, primarily in Sindh province, and Christian girls, primarily in Punjab. Low-caste Hindu communities face heightened exposure because of the economic dependencies inherent in agricultural and bonded labour relationships with dominant landlord families. The Human Rights Commission of Pakistan's fact-finding report *Exodus: Is the Hindu Community Leaving Sindh?* documented that Hindu families in Sindh grapple with perpetual threats of harassment, kidnapping, and forced conversion, with families discontinuing the education of their daughters and moving to safer areas --- often to larger cities, and sometimes to India --- as their primary coping strategy in the absence of reliable state protection. (Source: HRCP, *Exodus: Is the Hindu Community Leaving Sindh?*, 2024)

b) The Scale --- and the Problem of Under-Reporting:

At least 421 cases of abduction and forced conversion of minority girls and women were reported in Pakistan between January 2021 and December 2024, according to the Human Rights Observer 2025 released by the Centre for Social Justice (CSJ). The victims included 282 Hindu girls, 137 Christian girls, and two Sikh girls. Seventy-one percent of victims were minors: 22% were under the age of 14, and 49% were between the ages of 14 and 18.

For 2025 specifically, UN human rights experts reported that approximately 75% of women and girls affected by forced conversion through marriage were Hindu and 25% were Christian, with almost 80% of incidents

occurring in Sindh province. Adolescent girls between 14 and 18 were particularly targeted, and some girls were even younger.

These figures are acknowledged to be significant underestimates. The true figure is assumed to be much higher, as many cases are not reported due to fear of backlash from abductors or extremist groups. Police frequently refuse to register First Information Reports (FIRs), engage in compromises with abductors' families, or quickly accept a girl's purported conversion statement --- often taken in the presence of her abductor --- as conclusive evidence of consent.

c) The Legal Mechanism of Impunity:

The legal architecture that enables this practice operates on a specific logic: once a girl declares conversion to Islam --- under whatever conditions, before whatever authority, at whatever age --- the declaration is treated by courts and local administration as a voluntary exercise of religious freedom, and any family effort to recover the girl is reframed as attempting to interfere with her religious choice or to return her to a non-Muslim environment, which courts have ruled against on religious grounds. This inversion of protective logic --- treating the alleged conversion as the overriding fact rather than the circumstances in which it was obtained --- is the central mechanism through which the legal system fails victims.

UN experts expressed concern that forced marriages and religious conversions of girls from religious minorities which have been coerced are validated by the courts, often invoking religious law to justify keeping victims with their abductors rather than allowing them to return to their parents. The case of Maria Shahbaz has become the most internationally documented illustration of this legal mechanism. On 29 July 2025, Maria --- a 13-year-old Christian girl from Lahore --- was abducted by 30-year-old Shehryar Ahmad, who forced her to convert to Islam and married her within days. Five days after her abduction, the Model Town court of Judicial Magistrate Hassan Sarfaraz Cheema awarded custody of Shahbaz to her captor after accepting falsified documents claiming she was 18 years old and dismissing her family's documented evidence of her actual age. A subsequent re-investigation ordered by the Sessions Court found the marriage certificate to be fabricated --- the relevant union council confirmed no official record existed --- and the Deputy Superintendent of Police restored the FIR and added further charges. Nevertheless, on 25 March 2026, Pakistan's Federal Constitutional Court upheld the marriage, declared her of "mature age" on the basis of her physical appearance rather than her documented birth records, and returned her to her abductor without ever formally verifying her age. Lawyer Lazar Allah Rakha, who is representing her family, stated: "Maria is a child. She was abducted, her documents were found to be forged, and the court handed her back to the man who took her --- without even confirming her age. That cannot be allowed to stand." The case triggered protests across Pakistan, a European Parliament resolution specifically titled after her, and an ongoing review petition before the Federal Constitutional Court as of the time of this report's writing.

In the case of Mishal Rasheed, abducted at gunpoint from her home in 2022 while preparing for school, the girl was sexually assaulted, forcibly converted, and forced to marry her abductor --- yet the case initially proceeded against the family's challenge rather than against the abductor. In Rohri, Sindh in March 2022, 18-year-old Pooja Kumari was shot dead by her would-be abductor when she resisted kidnapping for forced

marriage --- her family had approached the police before the attack and received no assistance, because the abductor belonged to a powerful landowning tribe.

Pakistan has no dedicated federal law specifically criminalizing forced religious conversion, and the two-decade legislative record on this issue constitutes one of the clearest documented illustrations of the political cost calculation described throughout this report: the cost of challenging organized religious opposition consistently exceeds the political cost of leaving minority communities unprotected.

The most detailed case study is the Sindh Criminal Law (Protection of Minorities) Act, passed by the Sindh Assembly in December 2016 after years of advocacy. The bill was comprehensive: it required a 90-day waiting period before any conversion could be formalised, mandatory appearance before an additional sessions judge, judicial scrutiny of the circumstances of conversion, and specific protections for minors including temporary shelter during trial proceedings. Within days of its passage, JI chief Sirajul Haq telephoned PPP co-chairman Asif Ali Zardari. Minutes after that call --- according to contemporaneous reporting by the Express Tribune --- the PPP-led Sindh government announced it would seek amendments, and the Governor returned the bill without assent citing objections from the Council of Islamic Ideology. The same assembly that had passed the bill unanimously did not reconvene to override the Governor's objection. The pattern repeated itself in October 2019, when a second Sindh anti-conversion bill was formally rejected in the provincial assembly --- rejected by the newly elected Sindh Assembly of 2018 --- three years after the previous assembly had unanimously passed the original bill --- demonstrating that the pattern of yielding to religious pressure was not specific to one assembly's political composition but was reproduced by its successor."

At the federal level, Pakistan's Ministry of Human Rights circulated a draft Anti-Forced Conversion Bill in 2021. The Ministry of Religious Affairs convened a consultation on the bill --- and invited no member of any minority community to the meeting. Muslim clerics and scholars opposed the bill publicly, creating a trending Twitter hashtag --- "#Islam mukhalif bill na manzoor" (Reject the anti-Islam bill) --- and threatening protests. The Ministry of Religious Affairs rejected the bill. In parallel, Christian MNA Naveed Aamir Jeeva had been pursuing a Prohibition of Forced Religious Conversion Bill with the Standing Committee on Religious Affairs and Interfaith Harmony since 2019; it was set aside by the parliamentary committee in the face of the same clerical opposition. As recently as March 2024, Minority Rights Group International condemned "the recent decision of the Pakistani Parliamentary Committee to set aside a draft Bill aiming to address forced conversion in Pakistan" --- confirming the pattern continued into the current legislative term.

The most significant recent legislative development --- directly relevant to the forced conversion crisis --- is the passage of the **Punjab Child Marriage Restraint Act 2026** by the Punjab Assembly on 27 April 2026 by majority vote. The law sets 18 as the minimum legal marriage age for both males and females, replacing the Child Marriage Restraint Act of 1929 which had permitted girls to marry at 16. Child marriage is now classified as a cognizable, non-bailable, and non-compoundable offence, with penalties of up to seven years' imprisonment and fines of up to Rs1 million for those who facilitate or promote such marriages. The law prohibits *nikah khawans* from registering marriages involving minors. Punjab thereby joins Sindh, Balochistan, and the Islamabad Capital Territory --- Khyber Pakhtunkhwa remains the only province without equivalent legislation. Christian rights advocates welcomed the law as a significant step toward protecting

minority girls from forced marriage and conversion. Former PPP Senator Farhatullah Babar, while welcoming the passage, noted that "Pakistan does not suffer from a lack of laws but suffers from a lack of enforcement" --- a caution that the Maria Shahbaz case, in which Pakistan's Federal Constitutional Court upheld a marriage involving a 13-year-old despite documented forgery and evidence of minority age, makes especially timely.

The pattern across all these legislative attempts is consistent: the bill is proposed, religious parties mobilize opposition, political leaders yield, and the bill either lapses, is withdrawn, or is referred back without passage. In each case the minority community whose protection the bill was designed to provide was excluded from the consultation that determined its fate.

d) The Role of Shrines, Pirs, and Feudal Structures:

The geography of forced conversion in interior Sindh is not random, and it is not attributable to any single theological tradition. Research consistently identifies two specific shrine complexes as the most documented institutional facilitators: Dargah Bharchundi Sharif, near Daharki in Ghotki district, controlled by Mian Abdul Haq --- commonly known as Mian Mithu, a former PPP member of the National Assembly --- and the Pir Ayub Jan Sarhandi shrine in Samaro tehsil, Umerkot district, whose *gaddi nashin* Pir Muhammad Ayub Jan Sarhandi has publicly claimed to have overseen thousands of conversions, almost all of them Hindu girls from scheduled-caste communities including Bheel, Meghwar, and Kohli. Pir Sarhandi's brother, Pir Waliullah, stated on record: "When a girl is brought before a qazi for conversion to Islam, the qazi must comply immediately. If he delays the conversion even to say his prayers, he himself becomes kafir." The shrine's attached madrassa, Gulzar-i-Khalil, has been described by rights monitors as a rapid conversion pipeline where ceremonies are conducted without age verification or consent scrutiny.

Both of these shrines are Sufi institutions associated with the Bareilvi tradition --- which is, as a general theological orientation, considered more pluralistic and inclusive than the Deobandi tradition. This apparent contradiction requires analytical precision: the involvement of these specific shrines reflects not Bareilvi theology but a Sindhi feudal-religious dynamic in which *pir families* wield simultaneously the spiritual authority to declare a conversion valid, the social authority to shield the abductor from community and police accountability, and the economic authority that comes from commanding the loyalty of agricultural communities whose livelihoods depend on their patronage. The conversion certificates they issue carry quasi-official standing in courts. Separately, some conversions in Punjab and Karachi have been documented at Deobandi madrassa institutions --- the 2020 case of Bharti Bai, abducted in Sindh, involved a conversion certificate issued by Jamiat-ul-Uloom Islamia in Banori, Karachi. What unites both channels is not theology but impunity: both operate because the state consistently defers to religious institutional authority rather than investigate the circumstances in which consent was or was not obtained.

The economic dimension compounds the vulnerability. Minority agricultural workers in Sindh are frequently bound to feudal landlords through debt arrangements that reduce their practical freedom to resist. When a landlord or his ally targets a daughter, the family's debt is a deterrent against complaint, the police are aligned with the landlord's social class, and the courts are distant. The cumulative effect of forced conversion, economic discrimination, feudal exploitation, and absence of institutional remedy has produced a measurable demographic consequence --- the emigration of Hindu families from Pakistan, primarily from

Sindh. According to a statement made by Dr. Ramesh Kumar Vankwani in Pakistan's National Assembly in May 2014, citing a Pakistan Hindu Council study, approximately 5,000 Hindus were migrating to India annually due to religious persecution and forced conversions --- a figure that has been widely cited in human rights reports including the HRCP's 2025 fact-finding report *Exodus: Is the Hindu Community Leaving Sindh?* However, the HRCP's own 2018 annual report acknowledged that "no authentic data is available on forced conversions" and by extension on the exact scale of religiously motivated emigration; the 5,000 figure should therefore be understood as a community estimate rather than an independently verified statistic.

It must also be noted that the migration pathway itself has become increasingly constrained. Pakistani Hindu families who cross into India --- primarily through Rajasthan --- face significant bureaucratic obstacles: they are not automatically granted citizenship or refugee status, face legal limbo, and many remain undocumented years after arriving. India's Citizenship Amendment Act of 2019, which was specifically designed to offer a pathway to citizenship for persecuted Hindus, Christians, and Sikhs from Pakistan, Bangladesh, and Afghanistan, has been implemented unevenly and with considerable delay. The structural consequence is that Pakistani Hindus facing persecution face a double trap: the state that should protect them does not, and the neighbouring state that should receive them does not reliably do so either. What the emigration figure represents --- however imprecisely measured --- is not a free choice to migrate but an exit from a situation in which no institutional remedy is reliably available, toward a destination in which no guaranteed reception exists.

e) International Response and Pakistan's Obligations:

The most authoritative international interventions on Pakistan's forced conversion crisis have come from the UN Human Rights Council's Special Procedures --- a group of independent mandate-holders who have issued three successive public statements on this issue, each documenting escalating concern and citing persistent state failure to act.

The **first statement**, issued on **16 January 2023**, was endorsed by: Tomoya Obokata, Special Rapporteur on contemporary forms of slavery, including its causes and consequences; Mama Fatima Singhateh, Special Rapporteur on the sale and sexual exploitation of children; Reem Alsalem, Special Rapporteur on violence against women and girls; Nazila Ghanea, Special Rapporteur on freedom of religion or belief; Fernand de Varennes, Special Rapporteur on minority issues; Siobhán Mullally, Special Rapporteur on trafficking in persons, especially women and children; and Dorothy Estrada-Tanck (Chair), Ivana Radačić (Vice-Chair), Elizabeth Broderick, Meskerem Geset Techane, and Melissa Upreti of the Working Group on discrimination against women and girls. The experts stated that they were "deeply troubled to hear that girls as young as 13 are being kidnapped from their families, trafficked to locations far from their homes, made to marry men sometimes twice their age, and coerced to convert to Islam, all in violation of international human rights law," and urged Pakistan to take immediate steps to prevent and thoroughly investigate such acts, noting that courts had enabled perpetrators by accepting fraudulent evidence on victims' ages and consent.

The **second statement**, issued on **11 April 2024**, was endorsed by Tomoya Obokata, Nazila Ghanea, Nicolas Levrat (Special Rapporteur on minority issues), Siobhán Mullally, and the Working Group on discrimination against women and girls. The experts stated that "Christian and Hindu girls remain particularly vulnerable to

forced religious conversion, abduction, trafficking, child, early and forced marriage, domestic servitude, and sexual violence," and that "the exposure of young women and girls belonging to religious minority communities to such heinous human rights violations and the impunity of such crimes can no longer be tolerated or justified." They also expressed specific concern that "forced marriages and religious conversions of girls from minority communities were being validated by the courts, often through the invocation of religious law, resulting in victims being kept with their abductors rather than being allowed to return to their parents." The statement specifically cited the case of a 13-year-old Christian girl abducted on 13 March 2024 whose age was falsified as 18 on her marriage certificate --- the same pattern documented in the Maria Shahbaz case of 2025--2026, indicating the practice had not been interrupted between the two statements.

The **third statement**, issued on **22 April 2026**, was endorsed by Tomoya Obokata, Nazila Ghanea, Nicolas Levrat, Siobhán Mullally, Claudia Flores (Chair), Ivana Krstić (Vice-Chair), Dorothy Estrada Tanck, Haina Lu, and Laura Nyirinkindi of the Working Group on discrimination against women and girls, and Reem Alsalem, Special Rapporteur on violence against women and girls. The statement described the practice as "continued and widespread" and noted that impunity was fuelling what the experts characterized as a "relentless practice." The experts stated that "the scale and persistence of such grave human rights violations point to systemic discrimination against non-Muslim women and girls," and that "women and girls facing poverty and marginalisation face heightened risks, often being exposed to physical and sexual abuse and exploitation, social stigma, and severe trauma." They called on Pakistan to ensure that "any change of religion or belief must be genuinely free from coercion, threats, and undue inducements," and specifically noted that security forces had acted as accomplices rather than protectors in documented cases. The statement warned of "rampant impunity" and urged Pakistan to raise the minimum marriage age to 18 nationally --- a recommendation that was partially addressed by Punjab's Child Marriage Restraint Act 2026, though KP remains without equivalent legislation.

Pakistan has ratified the Convention on the Rights of the Child, the Convention on the Elimination of All Forms of Discrimination Against Women, and the ICCPR. Article 14 of the CRC guarantees children the right to freedom of religion, including freedom not to have a religion imposed upon them. Article 16 of CEDAW requires that marriage be entered into only with the free and full consent of both parties. Article 18 of the ICCPR guarantees freedom of religion or belief. The three successive expert communications confirm that Pakistan's obligations under these instruments are not being met --- and that the pattern of non-compliance has persisted, and in some documented cases worsened, across four years of repeated UN engagement

f) Synthesis

The forced conversion of minority girls and women is not primarily a law enforcement problem awaiting better policing --- it is a structural problem rooted in the intersection of economic vulnerability, feudal power, a legal framework that treats any declared conversion as presumptively valid, and a political environment in which legislation to challenge that framework consistently fails. It is also a problem with a measurable demographic consequence: Ramesh Kumar Vankwani, a member of the National Assembly, has stated that around 5,000 Hindus migrate from Pakistan to India every year due to fear of forced conversions. Each family that leaves represents not only a human rights failure in the individual case but a further shrinking of Pakistan's minority presence --- a trend that, aggregated over decades, is measurably reducing

the country's religious diversity even while its constitution formally guarantees minorities the right to practise their faith freely.

3.6 Socio-Economic Discrimination and Class Vulnerability

BY THE NUMBERS

An estimated 80% of Pakistan's sanitation workers are Christians, a religious minority comprising a small fraction of the national population — the legacy of decades of job advertisements restricting sanitation posts to non-Muslims.

a) The Caste-Religion-Class Intersection

Economic marginalization and religious discrimination in Pakistan are not parallel phenomena --- they are structurally fused. The majority of Pakistan's Christian community trace their religious history to mass conversions in the late nineteenth and early twentieth centuries, when American and British missionaries worked primarily among the lowest Hindu castes --- in what was then the Punjab region of British India. Conversion to Christianity offered symbolic escape from the caste hierarchy; it did not offer material escape. The caste associations of their ancestors followed these communities into the new religious identity, embedding them in a socioeconomic position that has proved remarkably durable across generations and across the transition from British India to the Islamic Republic of Pakistan. Today, approximately 80% of Pakistan's sanitation workers are Christians, a figure that is not coincidental but the direct consequence of a social order that inherited and reproduced caste labour assignments under a different ideological vocabulary.

This fusion creates what researchers at Stanford's Center for Human Rights and International Justice describe as a triple axis of oppression --- class, caste, and religious identity --- that operates simultaneously rather than in sequence. Being Christian in Pakistan does not merely expose a person to religious discrimination; it activates a pre-existing socioeconomic stigma that determines what work is offered, where one lives, which schools one can access, and how institutional actors --- police, landlords, employers --- treat complaints of abuse. Addressing the religious discrimination without addressing the class vulnerability, or vice versa, leaves the structural mechanism intact.

b) The Institutionalization of Menial Labour

The most precisely documented form of occupational discrimination against minorities is the formal, state-sanctioned reservation of sanitation work for non-Muslims. Urban sanitation job advertisements regularly state that "only non-Muslims may apply," institutionalising exclusion and promoting the idea that sanitation is "Christian" work. This is not informal social practice --- it is written into formal recruitment notices issued by government bodies. The Hyderabad Municipal Corporation's 2017 call for 450 sanitation workers, for instance, required employees to be non-Muslim and to take an oath swearing they would only work as sanitary workers and not refuse any task. In Peshawar, as many as 80% of Christians are in sanitation work. When Muslims were recruited in Karachi for a sanitation role, they refused to go into sewers and choose street sweeping only, leaving the underground work to Christians.

In December 2025, the Islamabad High Court --- in two landmark rulings delivered by Justice Raja Inam Amin Minhas on petitions jointly filed by the Center for Rule of Law Islamabad (CROLI) and the Pakistan United Christian Movement (PUCM) --- imposed a strict ban on the use of the phrase "Christians only" in sanitation job advertisements, finding the practice unconstitutional under Articles 25, 27, and 36 of the Constitution, and called for comprehensive and urgent safety measures to curb the increasing deaths of sewage cleaners. on the basis of the National Commission for Human Rights' report documenting extensive deaths, injuries, and unsafe conditions faced by sanitation workers across the country between 2022 and 2024. Balochistan had issued a similar administrative directive banning religion as an eligibility criterion for sanitation posts. The court's ruling and the provincial directive confirm what civil society organizations had long argued: the "Christians only" advertisement practice violates Articles 27 and 38 of the Constitution and Articles 1--7 of the International Convention on the Elimination of All Forms of Racial Discrimination, to which Pakistan is a signatory. The rulings are welcome --- what they also confirm, by the fact of their necessity in 2025, is that this practice had continued without legal intervention for decades after the constitutional framework that prohibits it was in place.

c) Workplace Conditions and the Cost of Religious Identity

Amnesty International's 2025 report, *Cut Us Open and See That We Bleed Like Them*, compiled testimonies from over 230 sanitation workers across Lahore, Bahawalpur, Karachi, Umerkot, Islamabad, and Peshawar and documented systematic exploitation at every level of the employment relationship. 55% of respondents said their caste or religion dictated hiring decisions. One man from Bahawalpur recalled applying for an electrician's post, only to be offered sanitation work once recruiters learned he was Christian: "Once they know you are Christian, the only work they offer is sanitation." Nearly half of the workers surveyed had been called derogatory slurs such as "chuhra" and "bhangi," and many reported being segregated in public spaces, including being denied shared utensils.

The National Commission for Human Rights' 2024 inquiry report, *Risk of Sanitation Work in Pakistan*, documented the conditions in which this workforce operates. Based on a survey of 42 sanitation workers in Karachi, the report found that 78.6% of sanitation workers were never provided personal protective equipment, while 57.1% reported workplace injuries including lung damage and dislocated joints. Justice Raja Inam Amin Minhas of the Islamabad High Court, citing the same data in his December 2025 judgment, noted that over 70 Christian sanitation workers had died since 1988 from exposure to toxic gases while cleaning underground drains --- with families receiving little or no compensation in the overwhelming majority of cases. The NCHR report further documented that many sanitation workers are daily wage labourers without formal contracts, leaving them exposed to wage theft, summary dismissal, and denial of pensions and healthcare. The report warned that these conditions persist due to the absence of occupational safety standards, weak enforcement of labour laws, and the structural discrimination against religious minorities that channels them into this work without the bargaining power that formal employment status would provide.

On 6 June 2024, Waqas Salamat --- an 18-year-old Catholic worker employed at a plastic bottle manufacturing factory owned by Haji Muhammad Saleem in Lahore's Islampura area --- was tortured to death after leaving his job in search of better work. The factory owner, his son Umar Saleem, and three co-

workers forcibly returned Waqas to the factory and subjected him to hours of electric shocks until he collapsed and died. His mother, Rubina Salamat, told investigators: "The torture was so excruciating that my son collapsed. There was nothing I could do to save his life." The factory owners and workers fled before police arrived; an FIR was registered against them. No prosecution outcome has been publicly reported..

On 21 March 2025, Zohaib Iftikhar, shift in-charge at Subhan Allah Paper Mills in Sheikhpura District, Punjab, slashed the jugular vein of his Christian co-worker Waqas Masih, 22, with a cutter blade after accusing him of committing blasphemy by touching an Islamic textbook with "unclean hands" while collecting scrap paper. Waqas Masih's written testimony, given to the Christian legal organization HARDs Pakistan, stated that Iftikhar had repeatedly pressured him to convert to Islam before the attack. Waqas Masih survived after emergency surgery at Mayo Hospital, Lahore. Iftikhar was arrested and charged with attempted murder. Father Lazar Aslam, a Capuchin Franciscan priest who visited the victim in hospital, stated: "Sadly, making false accusations of blasphemy and harassing vulnerable minority communities has become a disturbing trend in Pakistan."

On 12 May 2025, Kashif Masih --- a 35-year-old Catholic labourer who had worked for three years on the agricultural property of former police inspector Malik Irfan in Jamkay Cheema village, Sialkot District, Punjab --- was tortured to death on an unproven accusation of mobile phone theft. Irfan and his associates beat Kashif with wooden clubs and iron bars and hammered steel nails into his legs. He was found dumped on a roadside, barely conscious, and died from his injuries. The FIR (No. 1798/25) was registered under Sections 302, 148, and 149 of the Pakistan Penal Code. Malik Irfan was arrested. The Homicide Investigation Unit assumed charge of the case. Rights advocate Nasir Saeed of CLAAS-UK stated: "There is a dangerous culture of impunity where powerful individuals act as judge, jury and executioner. The government must take decisive action to break this cycle and show that the lives of Christians are valued equally."

In each of these cases the victim's identity as a Christian worker --- employed in manual or agricultural labour, economically dependent on Muslim employers, and without the social standing to resist false accusations --- was the precondition for the abuse. The religious framing of the violence --- blasphemy, conversion pressure, or simply the unspoken social order in which a Christian labourer's word carries less weight than his employer's --- reduced the practical expectation of legal protection, as rights organizations have documented consistently across this period.

d) The 5% Employment Quota: A Promise Systematically Broken

BY THE NUMBERS

More than 70% of government jobs earmarked for non-Muslims under the 5% minority employment quota remain vacant. In Sindh, 44% of minority children are out of school, compared to a 27% national average.

The Government of Pakistan established a 5% minimum employment quota for religious minorities in the federal and provincial public services on 26 May 2009. Fifteen years of implementation data document a consistent failure. As of June 2024, provincial governments had filled 17,924 posts out of 49,457 sanctioned

under the quota, leaving 31,533 vacancies unfilled. Statistics shared in Pakistan's parliament revealed that more than 70% of government jobs earmarked for non-Muslims were vacant. The Supreme Court took suo motu notice of this failure, expressing displeasure at the scale of unfilled positions --- yet the Commission established to monitor implementation has continued to report the same finding across successive annual reports. The two reasons most frequently cited by government departments for the unfilled positions --- that eligible minority candidates meeting the criteria are not available, and that minority candidates do not apply --- are themselves the product of the discrimination the quota was designed to correct: exclusion from quality education, lack of awareness of rights, and a well-founded calculation that applying for a position above the sanitation level will result in informal rejection.

The quota's composition further illustrates the problem. The government jobs filled by minorities are largely designated for sanitary workers, so they do not represent a substantial challenge regarding the nature of work available to the Christian community. A 5% quota that is almost entirely filled through sanitation positions does not advance minority economic integration --- it ratifies and formalizes the occupational ceiling that already existed. Meanwhile, almost 60% of minority students report experiencing discrimination, including refusal of enrolment, segregation in classrooms, and being forced to study religious subjects irrelevant to their beliefs. In Sindh, 44% of minority children are out of school, compared to the national average of 27%, ensuring that the educational deficits underlying the quota's non-implementation are reproduced in the next generation.

e) Bonded Labour, Land Grabs, and Rural Vulnerability

In rural areas, economic discrimination against religious minorities takes forms that overlap with other human rights violations documented in this report. Christians and low-caste Hindus in Punjab and Sindh are documented as working as bonded labourers in brick kilns and carpet-weaving industries --- conditions under which debt is used to prevent departure and abuse is structurally insulated from any legal challenge. In rural areas, land grabs from minority communities are common, with little protection or legal recourse. The Shoaib Suddle One-Man Commission --- constituted by the Supreme Court in 2019 under Dr. Muhammad Shoaib Suddle, a former Inspector General of Police, to oversee implementation of the Supreme Court's 2014 judgment (PLD 2014 SC 699) on minority rights --- reported at a press conference held alongside the Evacuee Trust Property Board (ETPB) Chairman Habibur Rehman Gillani that 3,500 hectares of minority property had been recovered from encroachers, with an estimated value of Rs23 billion, alongside Rs650 million recovered through rental payments. Suddle described the task as difficult and being conducted step by step. The figure is analytically significant in two directions simultaneously: it confirms that land expropriation of minority properties has occurred at a scale requiring a dedicated commission with judicial authority, and it documents only partial recovery. That the commission's own chairman later publicly expressed "helplessness" in implementing the 2014 judgment --- disclosing at a national advocacy conference in August 2023 that approximately 31,000 public sector vacancies under the minority employment quota remained unfilled --- illustrates with unusual candour the distance between the commission's mandate and its enforceability.

The economic vulnerability documented in this section is not separable from the forced conversion crisis documented in 3.5. Women and girls facing poverty and marginalisation face heightened risks of abduction

and forced conversion, and the feudal debt relationships that bind minority agricultural workers in rural Sindh and Punjab are among the primary structural conditions that make their daughters vulnerable to targeting. Economic exclusion and religious persecution are not two separate problems with two separate remedies --- they are expressions of the same structural position that Pakistan's legal and institutional order has assigned to religious minorities.

f) Synthesis: Socio-Economic Discrimination and Class Vulnerability

The evidence demonstrates that **religious discrimination and socio-economic marginalisation are mutually reinforcing rather than separate forms of disadvantage**. Among particularly vulnerable Christian and low-caste Hindu communities, occupational segregation, unequal access to education and public employment, unsafe and informal work, bonded labour, and insecure land tenure combine to restrict economic mobility and increase dependence on employers and other local power holders. These conditions can, in turn, heighten vulnerability to other violations documented in this report, including forced conversion, land dispossession and exploitation.

The persistence of these patterns despite constitutional protections, the 5% employment quota and recent judicial and administrative interventions indicates a significant gap between **formal equality and substantive economic opportunity**. Addressing that gap requires coordinated action across education, employment, labour protection, land rights and access to justice, rather than isolated measures directed at individual forms of discrimination.

3.7 Political Marginalisation and Unequal Citizenship

KEY FINDING

Minority communities have 4.43 million registered voters distributed across constituencies where they rarely constitute a decisive margin — leaving minority parliamentarians accountable to party leaders rather than the communities they are meant to represent.

a) The Architecture of Nominal Representation

Pakistan's Constitution makes formal provision for the political participation of religious minorities. The Constitution currently reserves 10 seats for religious minorities in the National Assembly, four in the Senate, and 24 seats in all provincial assemblies --- nine in Sindh, eight in Punjab, four in Khyber Pakhtunkhwa, and three in Balochistan. Local government setups reserve 5% of seats for minorities across all tiers. These numbers represent a formal architecture of inclusion. They do not represent substantive political power, for reasons that are structural rather than incidental.

The most fundamental is the mechanism by which reserved seats are filled. Under the joint electorate system introduced by General Musharraf in 2002 and carried forward to the present, minority voters participate in general elections alongside all other citizens --- a positive development from the segregated separate electorate system in place from 1985 to 2002, which had effectively quarantined minority political

participation. However, the reserved seats are allocated to political parties on the basis of their overall electoral performance in general seats, and the parties nominate whom they wish to these seats --- leaving minority voters with little say in who actually represents them. Community leaders describe this as a "selection" system masquerading as representation: the minority seat-holder is accountable to the party leadership that nominated them, not to the minority community in whose name they sit.

The mechanism by which reserved seats are filled creates a structural tension that minority civil society leaders and independent analysts have repeatedly documented. Under the current system, seats are allocated to parties based on their overall electoral performance and then filled by party nomination rather than direct community vote --- meaning a minority member's primary accountability runs to the party leadership that selected them, not to the community they nominally represent. This is not a theoretical concern: in an assessment published in Dawn, constitutional analysts noted that "Islamic political parties also select and send minority members to assemblies, despite the fact that, under the guise of Sharia, these same parties aren't prepared to grant them equal status of citizenship and fundamental rights," identifying a structural contradiction in which the nominating party's own ideology conflicts with the advocate role the nominee is supposed to fill. The 2018--2023 National Assembly provides the clearest concrete example: **James Iqbal**, a Christian politician, held a reserved minority seat through the quota of the Muttahida Majlis-e-Amal --- the coalition of Islamic parties --- while that same coalition's constituent parties opposed the legal safeguards minority communities were seeking in the same assembly. In the 2024 legislature, **Ravi Pahuja**, a Hindu member, holds his Balochistan provincial assembly reserved seat through the JUI-F quota.

This does not mean that minority parliamentarians have been silent or inactive. Several have demonstrated genuine advocacy within the structural constraints they face. **Dr. Naveed Aamir Jeeva** (PPP) introduced the constitutional amendment bill on Article 41 and 91. **Dr. Ramesh Kumar Vankwani** has raised forced conversion statistics in parliamentary questions, testified before human rights bodies, and publicly stated that approximately 5,000 Hindus migrate from Pakistan to India annually due to fear of forced conversions --- giving that figure authoritative parliamentary standing. Others have participated in Shoaib Suddle Commission proceedings and raised workplace discrimination issues in standing committees. The structural constraint is not that minority members are individually passive --- some have worked within significant constraints --- but that the nomination mechanism limits their collective leverage on the parties that placed them in the assembly, particularly when those parties' core electoral identity depends on religious conservatism that conflicts with minority rights advocacy. As Samson Salamat of Riwadari Tehreek stated directly: "Our biggest concern is the undemocratic and unfair adoption of the selection system for reserved seats. The right to elect one's own representatives is fundamental to meaningful democratic participation."

b) Constitutional Exclusion from the Highest Offices

The Constitution's formal exclusion of non-Muslims from the two most powerful executive positions in the state --- President and Prime Minister --- has been addressed elsewhere in this report (Part 2.2). In the context of political marginalisation, its significance operates not only as a formal bar but as a signal about the scope of citizenship available to religious minorities. When the constitution itself defines the head of state and head of government as necessarily Muslim, it places a ceiling on the political aspirations of every minority citizen --- a ceiling that is visible to minority children as they grow up, normalised through

constitutional text rather than challenged by it. This is not merely a theoretical concern. On 1 October 2019, Dr. Naveed Aamir Jeeva --- a Christian lawmaker from the Pakistan Peoples Party holding a reserved minority seat in the National Assembly --- sought to move the Constitution (Amendment) Bill 2019, which proposed removing the Muslim-only qualification from Article 41(2) (the eligibility requirement for President) and Article 91(3) (the requirement that the Prime Minister be a Muslim member of the Assembly). The National Assembly blocked the bill by majority voice before it could even be formally introduced or debated. The Minister of State for Parliamentary Affairs, Ali Muhammad, stated that Pakistan is an Islamic Republic where only a Muslim can hold the posts of President and Prime Minister. Jamaat-e-Islami member Maulana Abdul Akbar Chitrali went further, stating that no law against Islamic values and teachings could be passed, introduced, or even debated. The significance for this report's analysis is precise: the bill was not defeated after deliberation --- it was refused a hearing altogether. The constitutional bar on non-Muslim heads of state reflects not a historical residue awaiting legislative correction but an active, enforced political consensus.

c) The Separate Voter List: Ahmadi Disenfranchisement

Ahmadis face a distinct and more acute form of political exclusion. Under electoral law, any voter wishing to register as Muslim must sign a declaration affirming belief in the finality of the prophethood of Muhammad (PBUH) and declaring Ahmadis to be non-Muslims. An Ahmadi who signs this declaration renounces their faith. An Ahmadi who refuses to sign it is placed on a separate voter list that categorises them as non-Muslim --- and since Ahmadis regard themselves as Muslims, most refuse both options and effectively abstain from voting altogether. In December 2023, Human Rights Watch noted that discriminatory provisions in the electoral law effectively excluded members of the Ahmadiyya community because of their religious beliefs, as Ahmadis had to either renounce their faith or agree to be placed on a separate electoral list to vote.

d) The Competitive Outbidding Dynamic

The political marginalisation of minorities is reinforced by a dynamic in the mainstream party system that this report has identified in multiple contexts: competitive outbidding on religious identity. When TLP commands 2.9 million votes, when Khatm-e-Nabuwat platforms generate electoral heat, and when anti-minority blasphemy campaigns draw crowds, mainstream parties face structural incentives to accommodate rather than challenge the politics of religious exclusion. The minority community's 4.43 million registered voters are distributed across constituencies in which they rarely constitute a decisive margin. The political cost of defending minority rights --- incurring the wrath of organized religious blocs --- exceeds the political cost of leaving minorities unprotected in most electoral calculations. This is not unique to any one party; it is an incentive structure embedded in the electoral arithmetic.

The consequences for minorities are direct and documented: community leaders say the existing framework deprives them of meaningful democratic representation. In November 2025, Samson Salamat, chairman of Rwadari Tehreek (Movement for Equality), together with leaders of two other faith-based rights organizations --- Christian's True Spirit and Human Friends Organization --- filed a joint constitutional petition in the Lahore High Court seeking reform of the reserved seat nomination system. Salamat described the existing arrangement as "undemocratic and unfair" and argued that "the right to elect one's own

representatives is fundamental to meaningful democratic participation." The court had held four hearings on the petition as of the time of latest reporting.

e) Synthesis

The evidence presented above demonstrates a persistent gap between **formal political inclusion and substantive political participation** for religious minorities in Pakistan. Although minorities have reserved representation in Parliament and local government, the nomination-based system limits their direct accountability to minority voters; constitutional provisions exclude non-Muslims from the offices of President and Prime Minister; Ahmadis face distinct electoral exclusion; and the wider electoral system creates incentives for political parties to accommodate organised majoritarian religious pressures. Taken together, these structural factors limit the ability of minority citizens and their representatives to influence legislation, policy and political priorities affecting their communities. The central issue is therefore not the absence of formal representation, but the **limited political agency and unequal citizenship that persist beneath that representation**.

3.8 Weak Law Enforcement, Access to Justice and Impunity

KEY FINDING

Two years after the Jaranwala mob attack on the Christian community, 90% of identified suspects remained at large.

a) Impunity as a Structural Feature

Across the sections of this report --- blasphemy mob violence, forced conversion, targeted killings of Ahmadis, workplace violence against Christians, land expropriation of Hindu communities --- a single variable appears with greater consistency than any other: impunity. Perpetrators of violence against religious minorities in Pakistan are rarely arrested, rarely charged, rarely convicted, and rarely imprisoned. This is not a pattern of occasional failure --- it is a documented, recurring, and self-reinforcing feature of how Pakistan's law enforcement and justice systems interact with minority-targeted violence. The self-reinforcing quality is analytically important: impunity teaches future perpetrators that violence against minorities carries no legal cost, which lowers the threshold for the next incident, which produces further impunity, in a cycle that the state's formal legal framework is unable, or unwilling, to interrupt.

b) The Supreme Court's 2014 Directives and Their Non-Implementation

The Supreme Court of Pakistan's 2014 judgement in *Suo Motu Case No. 1/2014 (PLD 2014 SC 699)*, authored by Chief Justice Tassaduq Hussain Jilani, established a landmark set of directives for minority protection: the formation of a National Council for Minorities, the revision of school curricula to remove discriminatory content, the protection of places of worship, human rights training for law enforcement, implementation of the 5% employment quota, and the creation of a special task force to monitor implementation. More than a decade later, implementation across all these directives remains incomplete. Deployment of police units to protect places of worship has been uneven --- Sindh has shown relatively better resourcing, while

Balochistan lacks such measures entirely, and Punjab relies on ad hoc arrangements. Enforcement of the 5% employment quota remains critically under-implemented. The revision of curricula --- as documented in sections 3.2 and 3.3 --- has produced partial, contested reforms that have not resolved the fundamental bias documented by successive independent audits.

The Shoaib Suddle One-Man Commission, established to monitor implementation, has submitted fourteen reports to the Supreme Court, each documenting persistent gaps. Rather than registering improvement, the reports function as a periodic record of sustained non-compliance --- evidence of the distance between judicial instruction and executive practice that characterizes not only this issue but Pakistan's broader constitutional governance culture.

c) Police as Perpetrators and Facilitators

The role of law enforcement in minority persecution is not confined to inaction. Multiple categories of evidence show police as active participants in violations:

Police facilitated the destruction of minarets and prayer niches in at least five Ahmadi mosques in 2025; in one case police officials returned to a mosque established in 1904 and removed its minaret using a grinder. In forced conversion cases, police routinely refuse to register FIRs from families seeking recovery of abducted girls, engage in informal settlements with abductors' families, and in some documented cases work actively against the victim's family. The HRCP noted in its 2024/25 annual report that two individuals accused of blasphemy were extra-judicially killed by police while seeking protection from hostile mobs --- meaning that the police station to which the accused went for protection became the site of their death. In the Jaranwala attacks, police were present at the scene for over ten hours while mobs burned churches and homes and did not intervene effectively.

In none of these cases have the police officers concerned been the subject of successful prosecution.

d) The Access to Justice Barrier

Physical and financial access to the justice system compounds these structural weaknesses. NGOs active on religious freedom issues reported harassment by police and intelligence services, including threats to shut them down if they continued their efforts. Lawyers who take on minority rights cases demonstrated --- face professional isolation and physical danger. The legal aid infrastructure for minority communities is thin, under-resourced, and itself subject to intimidation. Rural minorities in Sindh and KP are in practice beyond the reach of the formal justice system for most violations, since legal representation requires financial resources their communities do not have, and the journey to provincial courts requires time and safety that their circumstances do not permit.

The National Commission for Minorities' Rights (NCMR) Bill, approved in 2025, represents a legislative acknowledgement of this access gap. The bill creates a statutory body with monitoring and oversight functions that the previous non-statutory arrangements had not effectively provided. Its approval marks a significant institutional development, with potential to enhance monitoring, accountability and independent oversight. Whether it translates into substantive improvement will depend on whether it is

resourced and empowered to act against state actors --- including police and provincial administrations --- as well as non-state perpetrators.

e) Synthesis: Weak Law Enforcement, Access to Justice and Impunity

The evidence demonstrates a persistent gap between **formal legal protection and effective enforcement** of the rights of religious minorities. Pakistan has constitutional safeguards, judicial directives, legislative provisions and institutional mechanisms intended to protect minorities, yet implementation remains uneven and accountability for violations is limited. Police inaction or complicity, barriers to legal representation and access to courts, intimidation of victims and rights defenders, and prolonged failure to prosecute perpetrators combine to reinforce a pattern of impunity. The result is that legal protection often remains formal rather than substantive. Addressing this gap requires not only further legal reform, but effective implementation, independent oversight, protection for victims and witnesses, and credible accountability for both non-state perpetrators and public officials who fail to discharge their duties.

Part 4: From Formal Protection to Substantive Equality

4.1 The Central Finding

CENTRAL FINDING

Christians are confined to sanitation work by job advertisements that state "non-Muslims only"; Ahmadis are arrested for offering Friday prayers; blasphemy accusers fabricate evidence and are rarely prosecuted while the accused spend years in prison before acquittal; lawyers who defend minority clients are murdered in their offices.

This report opened with a single analytical question: why do religious minorities in Pakistan continue to experience discrimination, insecurity, and violations of their human rights despite constitutional guarantees and international human rights commitments? Part 3 has documented the structural answer across eight domains. Part 4 draws that analysis into a coherent account of the gap between formal protection and substantive equality --- what explains it, what sustains it, and what closing it would actually require.

The gap is real, documented, and persistent. Pakistan's Constitution contains provisions that, read in isolation, would satisfy the formal requirements of a pluralistic constitutional order: Article 20 guarantees freedom of religion; Article 22(1) protects students from compulsory religious instruction outside their own faith; Articles 25 and 27 prohibit discrimination on grounds of religion in civil life and public employment; Article 36 mandates state protection of minorities; and the preamble envisions a society in which the fundamental rights of all citizens are guaranteed. Pakistan has ratified the ICCPR, the ICESCR, CEDAW, the CRC, and CERD --- international instruments whose provisions, taken together, offer a comprehensive framework of protection for the rights documented as violated throughout this report.

None of this framework has produced substantive equality for Pakistan's religious minorities. The evidence across this report's eight structural sections is consistent and cumulative: Christians are confined to sanitation work by formal job advertisements that state "non-Muslims only"; 70% of public sector positions reserved for minorities under a 15-year-old affirmative action policy remain unfilled; Ahmadis are arrested for offering Friday prayers; Hindu girls are abducted in broad daylight and courts return them to their abductors; blasphemy accusers fabricate evidence and are rarely prosecuted while the accused spend years in prison before acquittal; lawyers who defend minority clients are murdered in their offices; a state institution transfers an Ahmadi civil servant because a religious pressure group demands it; a century-old mosque is demolished with police assistance. These are not anecdotal failures --- they are documented patterns, recorded by Pakistan's own National Commission for Human Rights, its Supreme Court, its parliamentary committee testimony, and by multiple credible international monitoring bodies.

4.2 What Explains the Gap: Five Structural Factors

The constitutional order embeds exclusion alongside protection. The most significant explanation for the persistence of the gap is that Pakistan's constitutional order does not simply fail to protect minorities --- in several provisions, it actively institutionalizes their subordination. The Second Amendment of 1974 placing the definition of Muslim within state legislative authority, the Objectives Resolution's vision of sovereignty vested in Allah, the requirement that the President and Prime Minister be Muslim, and the blasphemy provisions of the Pakistan Penal Code are not external to the constitutional order --- they are part of it. This means that the constitutional provisions protecting minorities and the constitutional provisions excluding them coexist within the same document, and in practice the exclusionary provisions consistently constrain the protective ones. A constitutional amendment to allow a non-Muslim to become Prime Minister was rejected by parliament. Legislation to create meaningful safeguards against false blasphemy accusations has been repeatedly abandoned under pressure from religious lobbies. The constitutional architecture does not offer minorities a platform from which to claim substantive equality --- it offers them a set of protections that are formally available but practically overridden by the document's own foundational commitments.

The state has been both protector and perpetrator. This report has documented the state's direct participation in minority persecution across multiple sections: police facilitating the demolition of Ahmadi mosques; law enforcement officers extra-judicially killing blasphemy accused; Punjab Land Records Authority transferring a civil servant on religious grounds; the ISI signing a negotiated agreement with TLP as guarantor; state regulatory authorities blocking Ahmadi communications platforms; curriculum authorities producing textbooks that describe Hinduism's practices as worthless. The conventional account of minority persecution --- state protection insufficient against non-state threats --- does not adequately describe what this report has found. The state is not a neutral arbiter whose protection fails to reach minorities; it is, in significant measure, an active participant in the discrimination and violence it is constitutionally obligated to prevent. This distinction matters for remedy: the problem cannot be resolved by strengthening the state apparatus alone, because a significant portion of the violation comes from within that apparatus.

The political economy of religious mobilization penalizes minority protection. The political context documented in sections 3.3 and 3.7 creates structural incentives for state actors to accommodate organized religious pressure rather than resist it. When TLP commands 2.9 million votes, when Khatm-e-Nabuwat platforms generate mass street mobilization, and when the cost of challenging this movement is paid in violence against politicians, judges, and lawyers rather than in electoral losses, the rational political calculation is to yield. Pakistan's parliamentary record confirms this calculation: the bill allowing non-Muslim heads of state was rejected, forced conversion legislation has been repeatedly withdrawn under pressure from religious lobbies, and blasphemy law reform has not even been formally proposed in the National Assembly in more than a decade. Minority communities, with 4.43 million registered voters distributed across constituencies where they rarely constitute a decisive margin, cannot generate comparable political leverage. The result is a political system in which their rights are negotiable --- traded away as the cost of political accommodation with organized religious power --- while the formal constitutional language guaranteeing those rights remains unchanged.

Impunity functions as policy. Sections 3.4, 3.5, and 3.8 document that the perpetrators of anti-minority violence --- from the Jaranwala mob (90% of suspects at large after two years), to the murderers of Rashid

Rehman (never identified or prosecuted), to the killers of Ahmadis documented throughout 2025 (largely unprosecuted) --- operate in an environment of near-total impunity. This impunity is not a governance failure awaiting correction; it functions as a form of policy. By consistently declining to prosecute perpetrators of anti-minority violence while consistently enforcing the blasphemy laws against accused minorities, the state signals which forms of communal violence it regards as tolerable and which it regards as criminal. That signal is received, learned, and acted upon --- as the rising trend in blasphemy accusations (from 171 in 2022 to 344 in 2024) and the persistence of forced conversion (421 cases in four years) demonstrate.

Reform is announced but not implemented. The Supreme Court's 2014 minority rights directives, the National Action Plan's madrasa registration Point 10, the 5% employment quota introduced in 2009, the Directorate General of Religious Education's 2019 mandate --- each represents a genuine, formally adopted commitment to reform. Each has been systematically under-implemented, reversed, or captured by the same political and religious dynamics that produced the original violation. This is not a story of inadequate reform design but of reform resistance: organized religious actors have demonstrated, repeatedly and effectively, that they can extract accommodations from the state that halt or reverse minority protection measures without paying any significant political or legal cost. The Faizabad precedent --- a Supreme Court judgment identifying ISI involvement in extremist mobilization, followed by a whitewash inquiry and no accountability --- is the most sharply documented example of this dynamic, but it is not exceptional.

4.3 What Substantive Equality Would Require

Substantive equality for religious minorities in Pakistan cannot be achieved through the addition of more formal protections to an existing system whose political and institutional culture consistently fails to enforce the protections already on the books. The evidence across this report points to a set of conditions without which formal commitments will continue to produce the gap this report has documented.

First, constitutional reform to remove provisions that institutionalize inequality --- most urgently, the Second Amendment declaring Ahmadis non-Muslim and Ordinance XX, both of which have been identified by multiple UN treaty bodies as incompatible with Pakistan's ICCPR obligations, and the requirement that the President and Prime Minister be Muslim, which institutionalizes second-class citizenship for every non-Muslim Pakistani.

Second, blasphemy law reform to introduce intent requirements, anti-false-accusation safeguards, and mandatory judicial inquiry before arrest --- as recommended by the UN Human Rights Committee, USCIRF, and multiple domestic civil society organizations.

Third, accountability for state actors who participate in minority persecution --- specifically, enforcement of the existing legal framework against police officers who facilitate mob violence, demolish places of worship, or extra-judicially kill blasphemy accused; against officials who comply with religiously motivated pressure campaigns in civil service personnel decisions; and against madrasa administrators who teach content that incites hatred against named minority communities.

Fourth, curriculum reform with independent monitoring --- not another announced reform cycle, but a statutory independent body with the authority to audit textbooks, remove content that violates Article 22(1), and enforce compliance across all provincial textbook boards.

Fifth, political representation reform --- specifically, replacing the party-list nomination system for reserved minority seats with direct election by minority voters, so that minority parliamentarians are accountable to their communities rather than to party leaders.

These are not novel recommendations. Most have been made before --- by Pakistan's own Supreme Court, by UN treaty bodies, by domestic civil society, and by the international community. Their novelty is their consistent non-implementation. The question this report poses for its readers --- including the Government of Pakistan and the international community --- is not whether these reforms are necessary. The evidence across this report makes that question settled. The question is what combination of internal political will and external accountability can create the conditions under which they are actually implemented.

Positive State Initiatives: A Record of Partial Progress

It is necessary, in the interest of accuracy and balance, to note that the Pakistani state has not been uniformly inactive. Several institutional developments deserve acknowledgement as genuine, if incomplete, steps: the passage of the National Commission for Minorities Rights Act 2025 creating a statutory oversight body for the first time; the Punjab Child Marriage Restraint Act 2026 raising the minimum marriage age to 18; the Islamabad High Court's December 2025 ruling banning "Christians only" recruitment advertisements; the Supreme Court's Suo Motu Case No. 1/2014 issuing comprehensive minority rights directives; the establishment of the DGRE in 2019 for madrassa registration; and Pakistan's active engagement with UPR processes, through which it has accepted multiple minority rights recommendations. The significance of these developments lies not in their completion but in the fact that they demonstrate the state's capacity to produce institutional reform when political will exists --- making the persistent non-implementation of existing law and judicial directives a matter of choice rather than incapacity. Read together with the findings of Part 4, these initiatives confirm that the gap this report documents is a matter of political will rather than institutional incapacity: the state has shown it can act decisively when it chooses to. The recommendations that follow set out what sustained application of that same capacity would require.

Part 5: Recommendations

The following recommendations are addressed to four distinct actors: the Government of Pakistan and federal institutions; provincial governments; the international community; and civil society. They are organized thematically and drawn directly from the evidence base of this report. They are not aspirational --- each recommendation corresponds to a documented violation, a demonstrated institutional failure, or a reform whose necessity has been established by Pakistan's own constitutional commitments and international obligations.

To the Government of Pakistan and Federal Institutions

On constitutional and legal reform:

1. Initiate a consultative process toward the repeal or amendment of the Second Constitutional Amendment (1974) and Ordinance XX (1984), which collectively declare Ahmadis non-Muslim by state law and criminalize the practice of their faith --- provisions incompatible with Pakistan's obligations under Articles 18 and 26 of the ICCPR and identified as such by the UN Human Rights Committee.
2. Reform Sections 295-B, 295-C, and 298 of the Pakistan Penal Code to introduce a requirement of criminal intent, mandatory judicial scrutiny before any arrest in blasphemy cases, robust legal safeguards against false accusation, and prosecution of those who file demonstrably fabricated blasphemy complaints. These reforms should be based on consultation with minority communities, civil society, and legal experts and should be accompanied by sustained police training and judicial education to reduce the extra-legal threat environment that currently shapes lower court decisions.
3. Enact dedicated federal legislation criminalizing forced religious conversion --- specifically, conversion obtained through abduction, coercion, debt bondage, or involving persons under 18 --- with a mandatory waiting period before any declared conversion is legally recognized and with judicial inquiry as a prerequisite. Prosecute existing cases of forced conversion with the same institutional seriousness given to other serious criminal offences.
4. Remove the constitutional requirements that the President and Prime Minister be Muslim, as these provisions are incompatible with Articles 25 and 27 of the Constitution's own equality guarantees, with Article 26 of the ICCPR, and with the principle of equal citizenship.

On political representation and electoral reform:

5. Reform the reserved seat mechanism. Replace the party-list nomination system for reserved minority seats in the National Assembly and provincial assemblies with direct election by registered minority voters, so that minority parliamentarians carry a genuine democratic mandate from the communities they represent. This reform --- advocated by the constitutional petition filed in the Lahore High Court by Samson Salamat of Riwadari Tehreek and fourteen co-signatories in November 2025 --- would make minority MNAs accountable to minority communities rather than to the party hierarchies that currently control their positions.
6. Enable minority candidacy in general constituencies. Remove the financial, structural, and informal barriers that prevent minority candidates from contesting general constituency seats rather than only

reserved seats. Specifically: (i) provide state funding support for minority candidates running in general seats; (ii) require political parties to include a minimum proportion of minority candidates in winnable general-seat positions as a condition of their registration; and (iii) amend the Elections Act to remove any implicit religious affiliation requirements in candidacy declarations that disadvantage minority applicants.

7. Invest in minority political capacity. Establish a dedicated political participation programme --- under NCMR oversight --- that provides civic education, candidate training, and electoral engagement support for minority communities, with particular focus on young minority voters, women, and rural communities whose documentation barriers currently prevent voter registration. The 4.43 million registered minority voters represent a significant undercount relative to the demographic reality; closing this gap requires active outreach, not passive availability of registration processes.
8. Give local minority representatives actual budget authority. The 5% local government seats reserved for minorities across all tiers must carry genuine authority over local resource allocation. Minority local councillors currently hold ceremonial positions; legislation should specify that minority councillors have a defined role in budget planning for minority community services --- education, sanitation, places of worship protection, and social welfare --- rather than serving as consultative voices without decision-making weight.
9. Establish a cross-party parliamentary minority rights caucus. Formal recognition and resourcing of a cross-party Minority Rights Parliamentary Forum --- modelled on comparable mechanisms in the UK and EU --- would allow minority parliamentarians from across parties to coordinate on legislation affecting minority communities, receive civil society testimony, commission research, and issue joint statements to the Speaker and Executive, giving minority representation an institutional form that transcends any individual member's party loyalty.

On Ahmadiyya political participation and electoral rights:

10. Remove the discriminatory declaration requirement from the Elections Act 2017. The provision requiring Muslim voter registration applicants to sign a declaration about the theological status of Ahmadis is not a neutral administrative requirement --- it is a mechanism for enforcing religious discrimination through the electoral system. It must be repealed. Voter registration should require only citizenship verification, not theological declaration.
11. Dissolve the separate Ahmadiyya voter list. At minimum, Ahmadis should be able to vote as Pakistani citizens on a general voter roll without being required to declare themselves non-Muslim. The separate list is not a protection mechanism --- it is an instrument of exclusion and stigmatisation that effectively removes Ahmadis from the democratic process.
12. Restore Ahmadi eligibility to stand for elected office. The combination of their classification as non-Muslim and the requirement that candidates in Muslim-majority constituencies declare their Muslim identity has, in practice, made it impossible for Ahmadis to contest general seats. The Elections Act should be amended to permit Pakistani citizens to stand for election on the basis of citizenship, without reference to religious classification.
13. Provide interim protection through reserved seat access. Pending the structural reforms above, Ahmadis should be included within the non-Muslim reserved seat allocation, so that a community of between one and two million citizens is not entirely without parliamentary representation. This is an interim measure only --- the long-term remedy is the restoration of the full democratic rights withdrawn in 1974 and 1984.

Note on political reality: These recommendations face the most acute political resistance of any in this report --- including from the same parties that formally acknowledge Ahmadis' vulnerability to violence. The report does not propose them naively. It proposes them because they are legally required by Pakistan's own treaty obligations; because every successive UPR cycle has included them among accepted recommendations that Pakistan then fails to implement; and because the international community --- specifically USCIRF, UN treaty bodies, and bilateral partners --- has the tools of diplomatic and financial leverage necessary to make the political cost of continued disenfranchisement exceed the political cost of reform.

On accountability and law enforcement:

- 14.** Establish an independent accountability mechanism to investigate and prosecute law enforcement officers who have facilitated, participated in, or failed to prevent anti-minority mob violence, mosque demolitions, and extra-judicial killings --- including during the Jaranwala attacks of August 2023 and the Ahmadiyya mosque demolitions documented throughout 2025. Impunity for state actors participating in minority persecution is not a governance gap --- it is itself a form of state action, and it must be addressed as such.
- 15.** Implement the directives of the Supreme Court's 2019 Faizabad Dharna judgment in full, including the initiation of action against armed forces personnel who participated in unconstitutional activities during the 2017 sit-in. Accountability for politically motivated use of organized religious extremism by state or quasi-state actors is inseparable from accountability for the violence that extremism produces.
- 16.** Enforce the existing proscription of TLP in practice, not only on paper --- specifically by investigating and prosecuting TLP chapter leaders who directed the demolition of Ahmadi mosques and the mass arrest of worshippers documented in 2025, regardless of the subsequent lifting or modification of the organizational ban.

On madrassa regulation:

- 17.** Establish an independent curriculum review body, operationally separate from the wafaqs and from the Ministry of Religious Affairs, with the statutory authority to inspect teaching materials in registered and unregistered madrassas, identify content that violates the legal prohibition on teaching or promoting sectarian and religious minority hatred, and recommend prosecution of madrassa administrators who persist in using hate-inciting materials after formal notice. The existing self-regulatory architecture has failed across two decades and must be replaced with external accountability.
- 18.** Complete the registration process for all madrassas on the basis of the DGRE mandate and enforce the legal requirement that unregistered madrassas either register and comply with curriculum standards within a defined time period or be closed in accordance with existing legal authority. Apply the existing legal prohibition on foreign funding of madrassas with consistent enforcement rather than selective action.

On employment and economic inclusion:

- 19.** Direct all federal ministries and public sector employers to fill the existing 5% employment quota for minorities within a defined timetable, with compliance monitored by the NCMR and reported quarterly to the Supreme Court Commission. Expand the quota beyond sanitation positions by

explicitly prohibiting qualification criteria that restrict minority applicants to menial posts and by establishing a dedicated recruitment office to identify and support qualified minority candidates across all public service grades.

20. Fund targeted scholarships, preparatory programs, and educational grants to address the documented educational deficits --- 44% out-of-school rates for minority children in Sindh; 60% reporting classroom discrimination --- that currently prevent minorities from accessing the quota positions that are notionally available to them.

On the National Commission for Minorities' Rights:

21. Resource and empower the NCMR, whose enabling legislation was passed in 2025, with a mandate that explicitly includes the authority to investigate, report on, and refer for prosecution violations committed by state actors, not only non-state perpetrators. An oversight body that can act only against non-state actors cannot address the state participation in minority persecution that this report has documented throughout.
22. Strengthen the statutory foundation of the NCMR, established by the National Commission for Minorities Rights Act 2025 and appropriately relocated from the Ministry of Religious Affairs to the Ministry of Human Rights. While this represents a positive institutional development, parliament and the executive should ensure the Commission is provided with sufficient financial resources, independent secretariat capacity, and clear legal authority to investigate and report on violations committed by state actors --- not only non-state perpetrators.
23. Ensure that a substantive majority of the NCMR's members are drawn from religious minority communities --- including representatives from Christian, Hindu, Ahmadi, Sikh, and Baha'i communities --- so that the Commission's work reflects the perspectives and lived experiences of those it is mandated to protect. The Commission's membership should not be determined by political patronage but by community consultation and transparent selection criteria.

To Provincial Governments

24. Implement the Islamabad High Court's December 2025 ruling banning "Christians only" and "non-Muslims only" language in sanitation job advertisements across all provincial departments and attached entities, and enforce compliance with penalties for non-compliant government agencies and contractors.
25. Enforce the minimum age for marriage under provincial Child Marriage Restraint Acts, with specific protocols for marriage registration involving members of minority communities --- including independent judicial and NADRA verification of age where the declared age is under 18 and the declarant is a religious minority member.
26. Ensure that police in all districts are trained and instructed to register FIRs promptly in forced conversion and minority-targeted violence cases without requiring the victim's family to make repeated requests, attend multiple police stations, or provide informal payments. Establish accountability measures for police officers who refuse to register such FIRs.
27. Develop and implement provincial minority rights action plans with measurable targets, annual reporting, and civil society participation --- specifically including representatives from Hindu, Christian, Ahmadi, Sikh, and Baha'i communities in the monitoring mechanisms.

To the International Community

28. The governments and multilateral institutions that maintain development, security, and diplomatic relationships with Pakistan have a responsibility that flows from two sources: their own stated commitments to human rights in their bilateral and multilateral frameworks, and the specific obligations created by Pakistan's ratification of the international human rights instruments whose provisions are being violated at the scale documented in this report.
29. The UN Human Rights Council, treaty bodies, and Special Procedures should maintain and intensify engagement with Pakistan on the specific violations documented here --- including through Universal Periodic Review, periodic reporting under the ICCPR and CEDAW, and Special Rapporteur engagement --- and should publicly acknowledge when Pakistan's formal responses to recommendations fail to correspond to the documented ground reality.
30. Bilateral development partners should explicitly condition the continuation of development assistance and security cooperation on measurable progress in minority rights protection --- specifically: the prosecution of perpetrators of Jaranwala and comparable anti-minority violence; enforcement of the blasphemy law safeguards recommended above; completion of the Ahmadiyya mosque demolition accountability process; and implementation of the NCMR's mandate. Conditioning is not sanction --- it is the application of leverage that formal relationships create in support of commitments Pakistan has already made.
31. The UN Special Rapporteur on Freedom of Religion or Belief and the UN Special Rapporteur on Violence against Women should be invited by Pakistan to conduct in-country visits and report on the forced conversion, blasphemy law, and Ahmadiyya persecution issues documented in this report. If Pakistan does not issue such invitations voluntarily, the Human Rights Council should formally request them.
32. FATF should maintain scrutiny of the financial flows that fund madrassa operations outside the registered and audited framework --- specifically, the undisclosed foreign funding from Gulf states documented since 2015 --- as part of its ongoing engagement with Pakistan on terrorist financing risks.

To Civil Society --- in Pakistan and Internationally

33. Document and archive violations with precision --- naming perpetrators, identifying the state actors who failed to intervene, recording the timeline between accusation and violence, and preserving this record for future accountability proceedings. The pattern of impunity in Pakistan is sustained partly by the absence of a comprehensive, credible record that can be brought before accountability mechanisms; civil society documentation is the foundation of future justice.
34. Support and fund legal defence for minority community members facing blasphemy accusations, forced conversion proceedings, and land expropriation --- including the legal aid infrastructure that allows cases to reach higher courts where acquittals are more likely, and the security arrangements that allow lawyers to take on these cases without facing the fate of Rashid Rehman.
35. Build interfaith peacebuilding capacity at the community level --- the AFI/WPTGF model of engaging parents from Christian, Hindu, and Muslim communities in shared training on inclusion and conflict resolution represents a grassroots approach to the social attitudes that the curriculum and mosque discourse currently reinforce. Scale these approaches in partnership with majority-Muslim communities, framing minority rights not as a concession to international pressure but as consistent with Pakistan's own constitutional commitments and the teachings of Islamic scholars who have affirmed equal citizenship for non-Muslims.
36. Advocate for the protection of human rights defenders --- particularly lawyers, journalists, and civil society leaders who face threats for documenting minority rights violations --- including through

international solidarity, emergency relocation support, and naming-and-shaming of perpetrators of threats and violence against defenders.

Closing Note

CLOSING FINDING

The distance between Pakistan's legal commitments and the lived reality of minority citizens is one of the largest and most persistently documented human rights gaps in South Asia.

The central finding of this report is not that Pakistan lacks adequate legal commitments to minority rights --- it is that the distance between those commitments and the lived reality of minority citizens is one of the largest and most persistently documented human rights gaps in South Asia. Closing that distance does not require the invention of new principles. It requires political will to enforce the principles that Pakistan's own Constitution, its own Supreme Court, and its own treaty obligations have already established. The question of whether that political will can be generated --- from within Pakistan's democratic institutions, from minority communities themselves, from international accountability pressure, or from some combination of all three --- is the question on which the future of Pakistan's religious minorities depends.

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