

# Policy Brief

## Employment of Children in Pakistan

From scattered and inconsistent provincial and national laws to a uniform and harmonized child labour law

ISSUED BY  
Research Advocacy and Social Training Institute  
RASTI



## Abbreviations

BECPRA	Balochistan Employment of Children (Prohibition & Regulation) Act
BMZ	Federal Ministry for Economic Cooperation and Development
ECA	Employment of Children Act of 1991
ICT PECA	Islamabad Capital Territory Prohibition of Employment of Children Act
ILO	International Labour Organization
KP	Khyber Pakhtunkhwa
KPPECA	Khyber Pakhtunkhwa Prohibition of Employment of Children Act
NP	Not Prohibited
PPCLBKA	Punjab Prohibition of Child Labour at Brick Kilns Act
PRECA	Punjab Restriction on Employment of Children Act
RASTI	Research Advocacy & Social Training Institute
SPECA	Sindh Prohibition of Employment of Children Act
UNCRC	United Nations Convention on the Rights of the Child

Policy Brief on the Employment of Children in Pakistan: From scattered and inconsistent laws to a uniform and harmonized child labour law

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## Message from the Chairperson NCRC

Child labor continues to deprive many children of their right to a safe and healthy childhood. Despite ongoing efforts, numerous children remain trapped in hazardous and exploitative work, affecting their education, health, and overall well-being.

This policy brief, based on a detailed review of national and provincial child labor laws, highlights the urgent need for legislative reform. The inconsistencies in these laws weaken enforcement and leave children vulnerable to exploitation. As a nation committed to child rights, we must address this issue.

Pakistan's adherence to international conventions like the UNCRC and ILO underscores our pledge to protect children. However, disparities in age definitions, light work regulations, and hazardous work provisions reveal significant gaps in our legal framework. Following the 18th Amendment, it is crucial to establish uniform child labor laws that offer comprehensive protection for all children.

This policy brief advocates for the necessary legal reforms and effective policy interventions required to close these gaps and ensure that every child in Pakistan can grow up in a safe and nurturing environment.

The NCRC has been advocating for putting a ban on child labor in domestic work. The commission has drafted a bill on banning child labor in domestic work after a thorough consultative process, and the previously mentioned bill is set to be laid at the cabinet by the ministry of human rights.

I urge all stakeholders—government bodies, civil society, and the private sector—to come together in this crucial effort. The elimination of child labor is not just a legal obligation but also a moral imperative. We must ensure that every child in Pakistan is given the opportunity to realize their full potential, free from the shackles of exploitative labor.

Sincerely,

Ayesha Raza Farooq  
Chairperson  
National Commission on the Rights of Child (NCRC)

## Message from the Country Coordinator KNH

The forthcoming Policy Brief on the Employment of Children in Pakistan underscores the pressing need to unify the nation's disparate provincial and national child labor laws into a coherent and comprehensive framework. The current inconsistencies and gaps in Laws have left children vulnerable to exploitation, highlighting the critical need for a more integrated approach. The brief advocates for a collaborative, multi-stakeholder strategy, emphasizing the inclusion of child participation in legislative reforms. Such a participatory approach is essential for creating robust protections and ensuring that all children benefit from a consistent legal framework. By aligning national legislation with international standards, we aim to address these gaps and work towards a future where every child in Pakistan is safeguarded from exploitation and abuse. With the support of dedicated organizations and stakeholders, we are confident that it is possible to establish a unified legal framework that enhances protection for children and fosters a safer environment for their development and well-being.

Kiran Shahzadi  
Country Coordinator  
Kindernothilfe (KNH)

## Preface

It is with great pleasure that I present this Policy Brief on the Employment of Children in Pakistan, a comprehensive examination of the legal landscape surrounding child labor in our country. As the Executive Director of RASTI, an organization dedicated to the welfare and rights of children, I am deeply committed to addressing the critical issues surrounding child labor and advocating for policies that protect our most vulnerable population.

This policy brief represents a culmination of extensive research, analysis, and collaboration aimed at addressing the scattered and inconsistent laws governing child labor in Pakistan. It is my sincere hope that this brief will catalyze meaningful change, sparking dialogue and action towards the establishment of a uniform and harmonized child labor law across the country that safeguards the rights and well-being of our nation's children.

I would like to extend my gratitude to the team at BMZ, particularly Mr. Atif Abbas (Project Manager) and Ms. Maryam, whose unwavering support and tireless efforts have been instrumental in the development of this policy brief. Their expertise, dedication, and commitment to our cause have been invaluable throughout this process.

I extend my heartfelt gratitude to Chairperson, National Commission on the Rights of Child (NCRC), Senator Ayesha Raza Farooq, for her guidance and support for this project. I would also like to extend my gratitude to the dedicated team of the NCRC, particularly Ms. Maham Afridi, for her expert insights and views.

I would also like to express my appreciation to Dr. Abdullah Khoso (Assistant Professor), our esteemed consultant, whose profound insights and expertise have greatly enriched this policy brief. His guidance and contributions have been indispensable in shaping our understanding of the complex challenges posed by child labor in Pakistan.

Thank you to all those who have contributed to this important initiative. Your dedication and commitment to the cause of child welfare are truly commendable, and I am confident that together, we can work towards a brighter future for all children in Pakistan.

Zaheer Abbas  
Chief Executive Officer  
RASTI

## About RASTI

RASTI is a Pakistani national-level child-focused non-profit, non-governmental organization (Registration No. DSW (1480)-K) established in 1995. RASTI works with children, youth, and women to improve their living conditions. The main objective of the organization is to create an environment where children can enjoy and have easy access to their fundamental rights. RASTI is committed to promoting and protecting children's rights through community participation and stakeholder involvement. Over its 27 years of experience, RASTI has implemented several development projects with various organizations at national, international, and government levels.

## About NCRC

The National Commission on the Rights of Child (NCRC) has been established by the Government of Pakistan as an independent statutory body for the promotion, protection, and fulfilment of children's rights in Pakistan. It has the mandate to examine and review policies, laws, practices and proposals, inquire into violations of child rights, conduct research, raise awareness, build capacities, provide technical support and advise the Government on legislative and policy matters by virtue of the National Commission on the Rights of Child Act, 2017.

## Background and Introduction of the Project

RASTI in partnership with the German Ministry for Cooperation and Development BMZ is implementing a project "Listening to the Experts" with technical partner Kindernothilfe.ev. This project will be implemented in five districts Chakwal, Muzaffargarh, Rawalpindi, Peshawar and Karachi focusing on the advocacy for working children involved in hazardous work and their voices to be heard by the key stakeholders. The project is based on the experiences with the previous projects "It's Time to Talk! - Children's Views on Children's Work" (2016-2020) and the following project "Dialogue Works - Anchoring Working Children's Participation Sustainably in Societal and political processes" (2020-2024) co-funded by BMZ. Whereas "Time to Talk" concentrates on the global consultation of around 1800 working children and youth worldwide and the systematic recording of their perspectives and recommendations, "Dialogue Works" concentrates on establishing Children Advisory Committees to advocate for their rights as working children in their local context.

The project "Listening to the Experts" focuses particularly on the national contexts of Pakistan. Both, the international announcement of the 2021 Year of Elimination of Child Labour and the upcoming elections in the partner countries were considered as a fruitful window of opportunity to start this project for strengthening the participation of working children in political processes. The partners are experienced with the issue of child labour and consider it as one of the crucial child rights violations in the respective countries. Furthermore, in Pakistan, RASTI already focuses on the implementation of projects against child labour. For this reason, RASTI is well acquainted with the issue and the current political debate and has been in contact with relevant political stakeholders in the past. As the other implemented projects focus on specific areas, types of work, informal education and the self-help approach, the focus on advocacy and lobbying to strengthen child participation is a promising and useful complement to the work areas of the local project executing agency. The relevant experience RASTI has, especially in the field of child labour, will be a very useful tool to convince stakeholders to make the voices of working children and youth heard at the level where policies and planning are made.

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## Executive Summary

The Policy Brief on the Employment of Children in Pakistan is based on the analysis of secondary data, especially child labour-related national and provincial laws. It underscores Pakistan's commitment to international conventions like the UNCRC and ILO conventions, aiming to protect children from economic exploitation and hazardous labour. It delineates the distinction between child work and child labour, emphasizing the latter's detrimental impact on childhood, dignity, and potential. The brief advocates for uniform child labour laws post-18th Amendment, stressing the need for comprehensive legal reform and effective policy interventions to safeguard children's rights and eliminate exploitative labour practices.

The critical points and criticisms regarding the child labour laws across the provinces of Pakistan reveal several inconsistencies and gaps that have and continue to lead to uneven protection for children and adolescents. The age definitions differ significantly, with Punjab defining a child as a person who has not attained the age of fifteen years, while KP, Sindh, and Balochistan define a child as a person who has not attained the age of fourteen years.

Light work provisions also vary between provinces. KP allows children aged 12 and above to engage in light work for up to two hours per day, while Sindh and Balochistan have similar definitions but slight variations in age and conditions. These varying definitions and conditions for light work can lead to exploitation and inconsistent enforcement of child labour laws.

Although all provinces define hazardous work similarly, focusing on the nature and circumstances likely to harm children's health, safety, or morals, the specific occupations and processes considered hazardous are different. This has and will continue to result in inconsistencies in protection for children engaged in hazardous work.

The constitution and composition of committees on child labour vary across provinces. While Sindh, KP, Balochistan, and Punjab all have provisions to form committees to advise the government on child labour issues, the number of members and specific representation differ slightly. This variation may affect the uniformity and effectiveness of policy recommendations and enforcement.

There are notable differences in the emphasis on education and non-discrimination protections. Sindh mandates compulsory schooling for working children and adolescents, along with documentation and non-discrimination protections, while Balochistan focuses on ensuring compliance with education or training-related work conditions and emphasises wage equality for young workers. KP and Punjab lack explicit provisions on compulsory education and non-discrimination protections for child workers, representing significant gaps in the legal framework.

The authority to make health and safety rules also varies. KP mandates the government to make health and safety rules for young workers, while Balochistan allows the government discretion to make such rules and provides a detailed list of specific areas to be covered. The mandatory versus discretionary nature of rule-making and the specificity of the rules are signs of inconsistent protection and enforcement standards across provinces.

An overview of hazardous professions under the Employment of Children Act (ECA), 1991, and other provincial and national laws, showcases deep inconsistencies and gaps in child labour regulations. While the ECA broadly bans scavenging and rag-picking, it lacks specific prohibitions for sectors like coal mining,



addressed separately by the Mines Act of 1923. Various occupations, including fisheries-related work and transport roles, exhibit unclear or incomplete regulations across provinces. Begging is tackled differently by provincial laws, with some addressing it while others lack explicit provisions. Brick kiln and domestic labour are addressed in specific provincial laws, but sectors like auto workshops and home-based manufacturing lack clear regulations. This patchwork of laws underscores the need for comprehensive and standardized legal protections nationwide, ensuring consistent enforcement and safeguarding of child workers.

The challenges surrounding child labour laws in Pakistan are multifaceted and deeply rooted in inconsistencies and gaps across provinces. Fragmentation of legislation, varying minimum working ages, and the lack of uniform recognition of hazardous occupations create complexities in enforcement efforts and leave children vulnerable to exploitation and health risks. Furthermore, the absence of consistent political commitment, limited capacity in provincial labour departments, and economic pressures exacerbate the issue, hindering effective monitoring and enforcement of child labour laws.

Overall, the critical points of inconsistency in child labour laws across Pakistan include variations in age definitions, light work provisions, committee compositions, educational and non-discrimination provisions, health and safety rule-making authority, and notification requirements. These inconsistencies can lead to uneven protection for children and adolescents, gaps in the legal framework, and challenges in the effective enforcement of child labour laws. Additionally, deeply ingrained cultural norms accepting child labour and insufficient awareness and advocacy efforts further impede progress in combating the issue, highlighting the need for comprehensive legislative reforms, enhanced enforcement mechanisms, and robust awareness campaigns to effectively address child labour in Pakistan. Addressing these legal inconsistencies is crucial for ensuring comprehensive and uniform protection for child workers/labourers across the country.

## 1. Introduction

Pakistan ratified the UNCRC on 20<sup>th</sup> November 1990.<sup>1</sup> The protection of children from economic exploitation and from working in occupations that are harmful to their physical and mental development is emphasised in Article 32 of the UNCRC. Article 32 also emphasises that no work should be permitted if it interferes with a child's education. It stipulates that the state should establish the minimum age for admittance to employment, that the state should regulate working hours and employment conditions, and that the state should implement suitable penalties and other sanctions to ensure that the law is effectively enforced.<sup>2</sup>

Pakistan has made several commitments to address child labour, including the worst forms of child labour and hazardous child labour, through its adherence to International Labour Organization (ILO) conventions. These ILO-related commitments include the ratification of Convention No. 138 (Minimum Age Convention), which sets the minimum age for admission to employment and work at 15 years (or 14 years in developing countries under specific conditions) and aims to abolish child labour. Additionally, Pakistan ratified Convention No. 182 (Worst Forms of Child Labour Convention), which calls for immediate and effective measures to eliminate the worst forms of child labour, including all forms of slavery, trafficking, and hazardous work that harms the health, safety, or morals of children.<sup>3</sup> The ILO's conventions and recommendations, in conjunction with the United Nations Convention on the Rights of the Child (CRC), form a comprehensive framework for ensuring that children's rights are respected and upheld in the context of labour and beyond.

According to the ILO, not all child work is child labour; only work that harms their physical and mental well-being, dignity, or potential qualifies. Positive work aids development, such as family assistance or earning pocket money. Child labour, however, involves mentally, physically, or morally dangerous work, interfering with schooling or forcing dropout. The worst forms of child labour include slavery, trafficking, debt bondage, forced labour child labour, prostitution, pornography, and involvement in illicit activities. Hazardous child labour involves work likely to harm children's safety, health, or morals, including exposure to abuse, dangerous environments, hazardous substances, extreme conditions, or unreasonable confinement. These are detailed in ILO Convention No. 182 and Recommendation No. 190.<sup>4</sup>

In Pakistan, child labour is a persistent issue, culturally accepted and hardly a political concern<sup>5</sup>, with a significant number of children between 6 and 18 years of age engaged in various forms of work across different sectors - many among them are engaged in hazardous occupations and slavery type of

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<sup>1</sup> Khoso, A., & Kousar, U. (2022). The Founding Law of Pakistan's National Commission on the Rights of the Child: Legal Challenges, Bureaucratic Barriers, and Vague Opportunities. In *The Roles of Independent Children's Rights Institutions in Advancing Human Rights of Children* (Vol. 28, pp. 131-150). Emerald Publishing Limited.

<sup>2</sup> The United Nations. (1989). Convention on the Rights of the Child. <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

<sup>3</sup> ILO. (2021). Pakistan's journey towards the elimination of child labour: A timeline [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms\\_819050.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms_819050.pdf)

<sup>4</sup> ILO. What is child labour. <https://www.ilo.org/ipec/facts/lang-en/index.htm>

<sup>5</sup> A political concern means there is a lack of priority by politicians or political parties- thus, it has never been part of political parties' manifestos; and also, has not been an agenda item in political campaigns or government policies. It also implies policymakers have not focused on or invested resources in combating child labour. This neglect could be due to various reasons, including other competing interests or a lack of awareness. Additionally, child labour is seen as an economic necessity due to unemployment, low wages, and poverty; and addressing it politically is considered controversial or unpopular among constituents who rely on it for survival.

conditions, especially in agriculture (as bonded labourers), brick kilns, coal mines, domestic work and beggary to mention a few.

RASTI has identified 11 [i.e., coal mines, rag picking, grazing children (engaged in herding activities), fisheries (deep sea fishing, fish processing), transport (drivers, conductors), begging (forced), child hawkers, auto workshops, brick kilns, domestic child labour, home home-based manufacturing (adda work or hand embroidery; carpet weaving)] inherently hazardous occupations. However, only a few of these have been officially declared dangerous in Pakistan, and even then, only in certain regions, with poor implementation. Banning these 11 hazardous occupations in a single uniformed law is crucial, as children should not work under dangerous conditions. Additionally, there is a dire need to establish uniform child labour laws because there is a lot of inconsistency in the national and provincial laws after the 18<sup>th</sup> constitutional amendment. These inconsistencies provide loopholes for exploitation of children.

ILO Convention No. 182 on the Worst Forms of Child Labour (1999) seeks to eliminate the worst forms of child labour, including practices harmful to the health, safety, and morals of children. In Article 1, it calls for immediate and effective measures to secure the prohibition and elimination of the worst forms of child labour. In Article 2, it defines "child" as all persons under the age of 18. In Article 3, it identifies the worst forms of child labour, including slavery, trafficking, and forced labour.

ILO Recommendation No. 190 on the Worst Forms of Child Labour (1999) guides on implementing Convention No. 182. Paragraph 1 emphasizes the importance of education in eliminating child labour and ensuring children's participation in society. Paragraph 13 recommends measures to ensure that children removed from the worst forms of child labour have access to free basic education and vocational training.

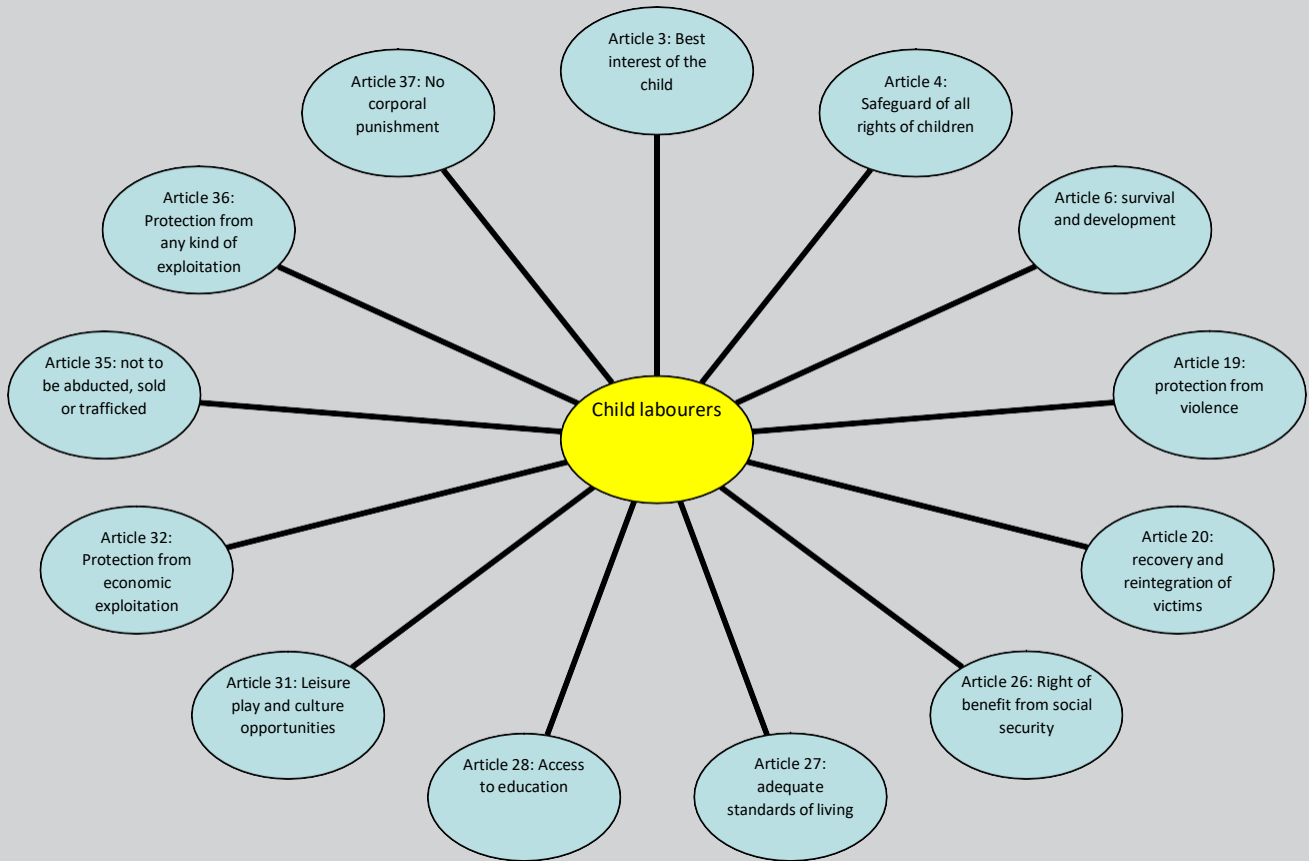
ILO Convention No. 189 on Domestic Workers (2011), while primarily focusing on domestic workers, includes provisions relevant to child workers. Article 4 requires measures to ensure that child domestic workers are afforded protections no less favourable than those applied to other workers, particularly regarding working hours and conditions. Article 6 emphasizes the right of domestic workers to be informed of their terms and conditions of employment, promoting transparency and participation.

There are nominal or rare efforts to combat child labour both at the practical as well as theoretical fronts. Thus, it continues to pose serious threats to the fundamental rights, well-being, education, and prospects of children in the country and, will eventually affect the growth and economy of the country.<sup>6</sup> A thorough understanding of the scope and impact of the legal framework on the formal and informal labour market (that recruits children for diversity of work is crucial for developing robust and effective policies and interventions to at least protect children from the hazardous or worst forms of child labour. This policy brief largely focuses on theoretical (legal) dimensions, which largely are being ignored while combating child labour, especially the worst forms of child labour in Pakistan.

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<sup>6</sup> Edmonds, E. V. (2015). Economic growth and child labor in low-income economies. *A Synthesis Paper Prepared for IZA/DFID*. Bonn: Institute for the Study of Labor.

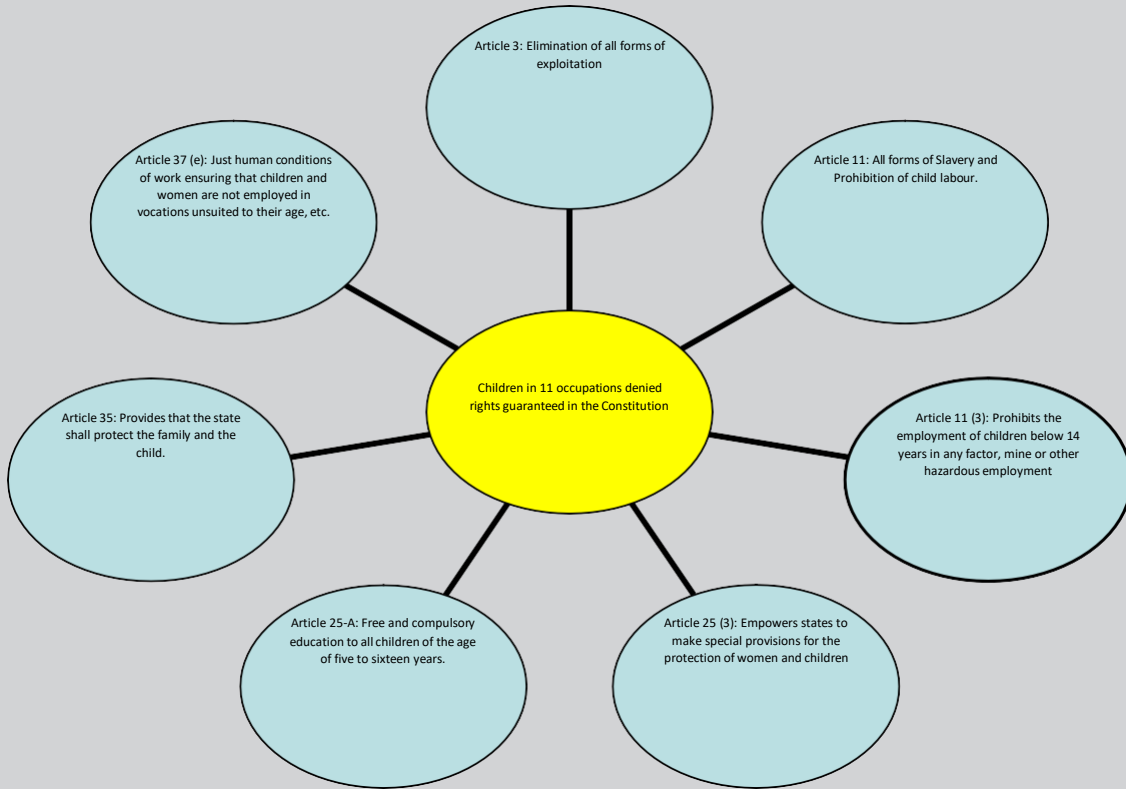
Figure 1: Child labourers denied fundamental rights in light of the UNCRC



### 1.1 Objectives of the Policy Brief

This policy brief provides a comprehensive overview of the Employment of Children Act (ECA) of 1991 in Pakistan (and its amendment in 2005) and the post-18<sup>th</sup> Amendment scenario (provincial landscape), especially when child labour has become a provincial subject and the legislative role in combating child labour. It has to be kept in mind that after the 18<sup>th</sup> Amendment, Balochistan, KP, ICT, Punjab, and Sindh introduced or enacted laws prohibiting the employment of children under 14 years of age (under 15 in Punjab) and regulating the employment of children above 14 years of age (above 15 in Punjab). These laws also repealed the Employment of Children Act of 1991 in their respective territories or provinces, thus making the ECA redundant in any part of the country. The ICT has not yet repealed the ECA of 1991; efforts are there to replace the law with certain modifications. However, by examining the provisions of the ECA of 1991, the provincial legal frameworks on child labour, and child protection laws, this policy brief aims to highlight the importance of legislative measures in protecting the rights of children and eliminating exploitative labour practices. Furthermore, the brief seeks to raise awareness among policymakers, stakeholders, and the general public about the significance of addressing child labour through targeted interventions and policy initiatives.

Figure 2: Child labourers denied fundamental rights in light of the Constitution of Pakistan



## 1.2 Methodology

This Policy Brief on the Employment of Children in Pakistan is based on a rigorous and comprehensive methodology aimed at providing an in-depth analysis of the legal framework governing child labour in the country. The methodology employed for the development of this brief involved several key steps.

The first step was doing a thorough literature review on the subject of child labour including academic publications, government reports, policy documents, and international conventions related to child labour in Pakistan. This literature review provided a foundational understanding of the historical context, current scenario, legal framework, and key issues surrounding child labour.

The second step was a detailed legal analysis to examine the relevant national and provincial laws, regulations, and policies governing child labour in Pakistan. This analysis focused on identifying inconsistencies, gaps, and areas of overlap within the legal framework with particular attention to definitions, prohibitions, and specific provisions related to hazardous work, light work, and minimum working ages.

The third step was a comparative analysis to compare and contrast the child labour laws across different provinces in Pakistan, including Khyber Pakhtunkhwa, Sindh, Balochistan, Punjab and the ICT. This analysis

sought to identify similarities, differences, and inconsistencies in definitions, prohibitions, enforcement mechanisms, and institutional frameworks for addressing child labour.

The adopted methodology ensured a comprehensive and evidence-based approach to the development of the Policy Brief on the Employment of Children in Pakistan, providing valuable insights and recommendations for addressing the complex and multifaceted issue of child labour in the country.

## 2. Current statistical overview of child labour and eleven hazardous child labour in Pakistan

### 2.1 National and provincial statistics of child labour

The Labour Force Survey (LFS) (2014–15) offers useful information on the situation of child labour. It is to be noted the LFS only includes data for children 10 to and 17 years (and does not include children between 6 to 9 years old, who are also engaged in child labour).<sup>7</sup> The LFS estimated that around 12.5 million children aged 10 to 17 were employed in child labour.<sup>8</sup> In 2004, the ILO estimated that 264,000 children were engaged in child domestic work in Pakistan.<sup>9</sup> In 2015, the ILO estimated 8.5 million people were engaged in domestic work in Pakistan.<sup>10</sup> A recent study estimates that one out of every four households employs a domestic worker, usually a female between the ages of 10 and 14. In Pakistan, in 2017, there were an estimated 32,200,000 households<sup>11</sup>, implying that 8,050,000 households had domestic workers, mainly female children. Also, *indicators of child labour surveys are not uniform; for instance, the Punjab Child Labour Survey (2019-20) include ages from 5 to 14 years of age; and the KP Child Labour Survey (2022) includes 5 to 17 years.*

Table 1 presents estimated child labourers and out-of-school children in Pakistan and its provinces. The data is based on various surveys and reports conducted between 1996 and 2022. According to estimates, Pakistan has a significant number of child labourers, with approximately 12.5 million children employed, of which 61% are boys aged 10 to 14, and 88% hail from rural areas (for reference see Table 1). Moreover, around 22.8 million children aged five to sixteen, which accounts for 39% of children in this age group, are out of school.

In Balochistan, the estimates suggest that there are around 13,723 child labourers between the ages of 5 and 15, with an additional 500 child labourers in the coal mines of the Loralai district, and an estimated 10,000 child labourers in Quetta city. The province also has a significant number of out-of-school children, with around 3.13 million children not attending school (for reference see Table 1).

In Khyber Pakhtunkhwa (KP), the estimates indicate that there are around 922,314 child labourers between the ages of 5 and 17, which accounts for 11.1% of children in this age group. Additionally, there are around 1,058,089 child labourers between the ages of 5 and 14, according to the 1996 National Child Labour Survey. The province also has a significant number of out-of-school children, with around 3.63 million children not attending school (for reference see Table 1).

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<sup>7</sup> Ahmad, I. (2017). Child Labour: Lack of Coherent Reforms in Pakistan. <https://clr.org.pk/wp-content/uploads/2020/06/Child-Labour.-Lack-of-Coherent-Reforms-in-Pakistan.pdf>

<sup>8</sup> The Borgen Project. Child Labour in Pakistan. <https://borgenproject.org/child-labor-in-pakistan/>

<sup>9</sup> ILO. (2004). World Day Against Child Labour: New ILO report highlights plight of children in domestic labour. [https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\\_005207/lang--en/index.htm](https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_005207/lang--en/index.htm)

<sup>10</sup> ILO. (2015). Giving rights to millions of domestic workers in Pakistan. [https://www.ilo.org/islamabad/info/public/fs/WCMS\\_347029/lang--en/index.htm](https://www.ilo.org/islamabad/info/public/fs/WCMS_347029/lang--en/index.htm).

<sup>11</sup> Government of Pakistan. Labour Force Survey. [https://www.finance.gov.pk/survey/chapters\\_18/12-Population.pdf](https://www.finance.gov.pk/survey/chapters_18/12-Population.pdf)

In Punjab, the estimates suggest that there are around 1.9 million child labourers, which accounts for 60% of the total child labourers in the country. Moreover, around 13.4% of children aged 5 to 14 are engaged in child labour. The province also has a significant number of out-of-school children, with around 11.73 million children not attending school (for reference see Table 1).

In Sindh, the estimates indicate that around 10% of children aged 5 to 17 are engaged in child labour, with around 0.29 million child labourers between the ages of 5 and 14. The province also has a significant number of out-of-school children, with around 7.63 million children not attending school (for reference see Table 1).

In Islamabad Capital Territory (ICT), the estimates suggest that there are around 0.08 million child labourers, with 60.3% of them in the 13-14 age group and 30.3% in the 11-12 age group. Moreover, around 33% of the under-18 population in ICT is out of school, according to a 2022 report (for reference see Table 1).

The statistical data in Table 1 on child labour in Pakistan lacks coherence and consistency at both national and provincial levels. Unfortunately, there are no exact figures available on this issue, and estimates are based on outdated surveys. This means that the data on child labour is unreliable, outdated, and potentially inaccurate, making it challenging to grasp the scope of the problem and develop effective solutions.

Province/region	Estimated Child Labour	Out-of-school children
Pakistan	-3.3 million (National Child Labour Survey – NCLS- in 1996) <sup>12</sup> -12.5 million children are employed as child labourers. Of these, 61 per cent are boys aged 10 to 14, and 88 per cent hail from rural areas. <sup>13</sup>	22.8 million children aged five to sixteen (39 % of children) in 2016-2017
Balochistan	-13723 children (age group 5-15) NCLS in 1996; -500 child labourers in the coal mine in the Loralai district; an estimated 10,000 child labourers in Quetta city. <sup>14</sup>	3.13 million
KP	-11.1 % 922,314 (age group 5-17) KP Child Labour Survey 2022 <sup>15</sup> -1058,089 (age group 5-14), NCLS in 1996;	3.63 million
Punjab	-1.9 million (60% of 3.3 million) in NCLS in 1996 <sup>16</sup> -13.4 % (age group 5-14) (3,835,956) Punjab Child Labour Survey 2019-20; <sup>17</sup>	11.73 million

<sup>12</sup> UNICEF. Child Protection. <https://www.unicef.org/pakistan/child-protection-0>

<sup>13</sup> The Borgen Project. Child Labour in Pakistan. <https://borgenproject.org/child-labor-in-pakistan/>

<sup>14</sup> The Balochistan Voice. (2016). <https://www.balochistanvoices.com/2016/03/alarms-situation-of-children-in-balochistan/>

<sup>15</sup> KPK Child Labour Survey Key Findings <https://dol.kp.gov.pk/wp-content/uploads/2024/01/Child-Labour-Survey-Key-Findings.pdf>

<sup>16</sup> Federal Bureau of Statistics (FBS). (1996). Summary results of Child Labour Survey in Pakistan (1996)

Sindh	10% of children aged 5-17 years are engaged in child labour <sup>18</sup> -0.29 million aged 5-14, NCLS in 1996	7.63 million
ICT	-Of the 307 working children interviewed in the ICT, 60.3 % were from the 13-14 years age group, and 30.3 % were from the 11-12 years age group. <sup>19</sup> - Children as young as 5-6 years old work in tyre shops, restaurants, and shops, often from 7:00 a.m. to 10:00 p.m., earning Rs.100 per day. Some employers claim to pay them Rs.250 per day. These children include beggars with assistants. <sup>20</sup>	-0.08 million <sup>21</sup> -according to a 2022 report by the federal ombudsman, 33% of the under-18 population in ICT, is out of school. <sup>22</sup>

## 2.2 Statistics on the number of children engaged in eleven hazardous occupations

Table 2 presents statistics on children engaged in eleven hazardous occupations in Pakistan. While exact numbers are not available for each occupation, estimates suggest that thousands of children are working in coal mines, with some as young as eight years old. Similarly, a significant number of children are involved in rag picking, with estimates ranging from 5,000 to 100,000 in various cities. Children are also engaged in herding activities, cotton farming, and fisheries, including deep-sea fishing and fish processing. However, no national or provincial estimates are available for these industries. Reports suggest that thousands of children are working in these sectors, often in hazardous conditions. Additionally, child labour is prevalent in the transport sector, with an estimated 50,000 Qingqis (a type of vehicle) operating in Karachi alone- often being operated by children even under 16 years of age.

The data highlights the widespread nature of child labour in Pakistan, with children as young as five years old working in one of the eleven hazardous sectors of the country. The lack of accurate estimates and data underscores the need for better monitoring and reporting to address this critical issue. The table provides a glimpse into the extent of child labour in Pakistan, emphasizing the need for concerted efforts to ensure the protection and education of these vulnerable children.

<sup>17</sup> Punjab Child Labour Survey 2019-20: Key Findings Report

[https://labour.punjab.gov.pk/system/files/Punjab%20Child%20Survey%20KFR%20Report\\_0.pdf](https://labour.punjab.gov.pk/system/files/Punjab%20Child%20Survey%20KFR%20Report_0.pdf)

<sup>18</sup> Sindh Bureau of Statistics, Planning and Development Department [https://sbos.sindh.gov.pk/files/SBOS/MICS/MICS%202018-19/Snapshots/F15.MICS-Statistical-Snapshot-Child-labour\\_022021.pdf](https://sbos.sindh.gov.pk/files/SBOS/MICS/MICS%202018-19/Snapshots/F15.MICS-Statistical-Snapshot-Child-labour_022021.pdf)

<sup>19</sup> Hussain, M., Saud, A., & Khattak, M. u. R. (2017). Socio-Economic Determinants of Working Children: Evidence from Capital Territory of Islamabad, Pakistan. *Pakistan Administrative Review*, 1(2), 145-158. <https://nbn-resolving.org/urn:nbn:de:0168-ssoar-54471-8>

<sup>20</sup> Wafaqi Mohtasib. (2022). Inquiry into the plight of street children in ict – challenges & way

Forward [https://mohtasib.gov.pk/SiteImage/Downloads/Final%20Report%20of%20Street%20Children\\_Oct-22.pdf](https://mohtasib.gov.pk/SiteImage/Downloads/Final%20Report%20of%20Street%20Children_Oct-22.pdf)

<sup>21</sup> Minister wants 'education emergency' imposed to enrol out-of-school children (2024). <https://www.dawn.com/news/1822879>

<sup>22</sup> Wafaqi Mohtasib. (2022). Inquiry into the plight of street children in ict – challenges & way

Forward [https://mohtasib.gov.pk/SiteImage/Downloads/Final%20Report%20of%20Street%20Children\\_Oct-22.pdf](https://mohtasib.gov.pk/SiteImage/Downloads/Final%20Report%20of%20Street%20Children_Oct-22.pdf)



**Table 2: Statistics- The number of children engaged in eleven hazardous occupations**

Hazardous occupations	Number of children engaged in Pakistan
Coal Mines	<ul style="list-style-type: none"> <li>- There are no known figures about the exact or estimated numbers of working children in coal mines. However, from different regions, the media and other reports provided scattered numbers of children engaged in coal mines in Pakistan.</li> <li>-around 400 coal mines in Balochistan’s Harnai district, operated by over 30,000 men.<sup>23</sup> Children also work in these mines, but their numbers are unrecorded. Same in Sindh and KP.</li> <li>-at the Mach coal mines, estimated 20,000 workers; child labour is common there; at all the coal mines in Mach, children were working above ground sorting coal, collecting iron and picking up pieces of coal spilled across the fields.<sup>24</sup></li> <li>- in the Loralai district of Balochistan, up to 500 child mine workers, some of them as young as eight years old</li> </ul>
Rag Picking	<ul style="list-style-type: none"> <li>-6000 garbage pickers in Quetta<sup>25</sup></li> <li>-In 2004, an estimated 100000 rag pickers were considered in five major cities (Karachi, Peshawar, Quetta, Lahore and Islamabad); accurate data on the magnitude of waste-picking by children is not available.<sup>26</sup></li> <li>-in 2013, an estimated 5000 in Islamabad and Rawalpindi<sup>27</sup></li> <li>- an estimated that more than 20,000 children are working as rag pickers in Karachi.</li> <li>-an estimated a million street children in Punjab.<sup>28</sup></li> <li>-an estimated 1.5 million street children in Pakistan’s urban areas<sup>29</sup></li> </ul>
Grazing Children (engaged in herding activities)	<ul style="list-style-type: none"> <li>-no provincial and national estimates (the author)</li> <li>-according to the Hari Welfare Association NGO, in a rural village in Sindh, at least 20 children are permanently engaged in herding; and 40 children partly</li> </ul>
Fisheries (deep sea fishing)	<ul style="list-style-type: none"> <li>-no provincial and national estimates;</li> <li>-according to Pakistan Fisherfolk Forum, an estimated 800,000 fishermen are directly engaged in fishing; of these, more</li> </ul>

<sup>23</sup> The guardian. (2020). Coal Workers are orphans the children and slaves <https://www.theguardian.com/global-development/2020/feb/19/coal-workers-are-orphans-the-children-and-slaves-mining-pakistans-coal>

<sup>24</sup> Ibid.

<sup>25</sup> Express Tribune. Survey Findings on legislation against child labour in Balochistan <https://tribune.com.pk/story/626748/survey-findings-no-legislation-against-child-labour-in-balochistan>

<sup>26</sup> ILO. Pakistan's journey towards the elimination of child labour: A timeline [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms\\_887600.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms_887600.pdf)

<sup>27</sup> trash-pickers frail-and forgotten the children-in-the shadows <https://tribune.com.pk/story/519843/trash-pickers-frail-and-forgotten-the-children-in-the-shadows>

<sup>28</sup> Voice PK. At least a million children on Punjab’s streets says CPWB Chief <https://voicepk.net/2021/04/at-least-a-million-children-on-punjab-streets-says-cpwb-chief/>

<sup>29</sup> ILO. Pakistan's journey towards the elimination of child labour: A timeline [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms\\_887600.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms_887600.pdf)

	<p>than 30 % are under 18 years old</p> <p>-Reported in 2015, around, 16,000 fishing boats operated in Sindh and Balochistan’s seas; and most engaged underage boys.<sup>30</sup></p> <p>-reported in 2015, around 2,500 boys from 5 to 17 years old worked on the fishing boats as helpers to collect fish from the nets and deposit them in cold storage for transportation to the fish processing plants</p>
Fisheries (fish processing)	<p>-no provincial and national estimates (the author)</p> <p>-prevails in Karachi and Gwadar, Pasni (the author)</p>
Transport (driver)	<p>-no estimates (the author)</p> <p>-recent estimates indicate that 50,000 Qingqis are in Karachi city<sup>31</sup></p>
Transport (conductor)	<p>- no provincial and national estimates (the author)</p>
Begging (forced)	<p>-reported in 2022, in Islamabad, about 30% of respondent-children were begging<sup>32</sup></p>
Child hawkers	<p>-no provincial and national estimates (the author)</p> <p>-reported in 2022, in Islamabad, about 33% of the respondent children were selling miscellaneous items<sup>33</sup></p> <p>-an estimated 1.2 million street children live on Pakistan's streets, with Lahore having key hotspots including Data Darbar, Railway Station, Minar-e-Pakistan, Laxmi Chowk, Regal Chowk, and Badami Bagh, where they sell a variety of items.<sup>34</sup></p>
Auto Workshops	<p>- no provincial and national estimates (the author)</p> <p>-In 2013, in a small area of Peshawar city, 1,500 children were reported to be working in 300 automobile workshops<sup>35</sup></p> <p>-in 2016, 5,566 children were engaged at auto workshops, service stations, petrol pumps, hotels and restaurants in 10 Punjab districts<sup>36</sup></p>
Brick Kilns	<p>-no reliable estimates (the author)</p> <p>- More than 250,000 children work in brick kilns in Pakistan<sup>37</sup></p> <p>-estimated that around 70 % of bonded labourers in Pakistan are children, who constitute one-third of the 4 million people</p>

<sup>30</sup> The State of Children in Pakistan (2015) <https://mohtasib.gov.pk/SiteImage/Downloads/WMS%20Committee%20report/SOCP.pdf>

<sup>31</sup> Children on roads. (2014). <https://www.dawn.com/news/1147103>

<sup>32</sup> Wafaqi Mohtasib. (2022). Inquiry into the plight of street children in ict – challenges & way Forward [https://mohtasib.gov.pk/SiteImage/Downloads/Final%20Report%20of%20Street%20Children\\_Oct-22.pdf](https://mohtasib.gov.pk/SiteImage/Downloads/Final%20Report%20of%20Street%20Children_Oct-22.pdf)

<sup>33</sup> Ibid

<sup>34</sup> Khalid, A., Nasir, M., & Rehman, S. U. (2014). A Study to Identify the Hot Spots of Street Children in Lahore. *Pakistan Vision*, 16(1), 40-55.

<sup>35</sup> Mubasher Rehman Khattak.(). Determinants of Child Labor: A Case Study of Children Working at Automobiles Workshop at Tehkal Payan of Peshawar City, Khyber Pakhtunkhwa, Pakistan”. MPhil thesis. <https://file-thesis.pide.org.pk/pdf/mphil-development-studies-2013-mubasher-rehman-khattak--determinants-of-child-labor-a-case-study-of-children-working-at-automobiles-workshop-at-tehkal-payan.pdf>

<sup>36</sup> Express Tribune. 15566 children working in 10 districts. <https://tribune.com.pk/story/1129048/15566-children-working-10-districts> Bahawalpur, Dera Ghazi Khan, Hafizabad, Khanewal, Multan, Okara, Rahim Yar Khan, Gujranwala and Sheikhpura

<sup>37</sup> Over 250000 children work in brick <https://kufarooq2.blogspot.com/2015/10/over-250000-children-work-in-brick.html>

		<p>working in brick kilns<sup>38</sup></p> <ul style="list-style-type: none"> <li>-in 2021, in Punjab, 126,557 children in Brick kilns, of whom 94,052 are enrolled in school. The youngest child working at a brick kiln is 5 years old.<sup>39</sup></li> <li>- in 2021's report, estimated around 1 million men, women and children work in around 10,000 brick kilns in Punjab; and around 20,000 brick kilns in Pakistan<sup>40</sup></li> </ul>
Domestic Labour	Child	<ul style="list-style-type: none"> <li>-In 2004, an estimated 264,000 CDWs</li> <li>-In 2015, an estimated 8.5 million people were engaged in domestic work</li> <li>- In Pakistan, in 2017, estimated 32,200,000 households; 8,050,000 households had domestic workers mainly female children.<sup>41</sup></li> </ul>
Home-based manufacturing (adda work or hand embroidery; carpet weaving)	Home-	<p><i>Adda work</i></p> <ul style="list-style-type: none"> <li>- no national and provincial estimates specific about <i>adda</i> work (the author)</li> <li>-estimated 8.52 million home-based workers; of these, child labourers up to the age of 10 years are around 6 million<sup>42</sup></li> </ul> <p><i>Carpet weaving</i></p> <ul style="list-style-type: none"> <li>- no national and provincial estimates specific to carpet weaving</li> <li>- reported in 2021, an estimated 90% of Pakistan's carpet industry's workforce are children under the age of 14 years.<sup>43</sup></li> <li>-reported in 1990, estimated 80 per cent of carpet weavers in Punjab were children under 15 years of age<sup>44</sup></li> <li>- In 2012's report, an estimated 646 factories and 39,366 households were engaged in the carpet sector, employing a total of 105,915 regular workers. Of these workers, 33,413 (31.5 percent) were children.</li> <li>-In 2008, in Tharparkar, at least 40 per cent of the workforce in carpet weaving are children<sup>45</sup></li> </ul>

<sup>38</sup> Pakistan. (2022). [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2022/Pakistan.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2022/Pakistan.pdf)

<sup>39</sup> Child Labour at brick kilns. <https://opendata.com.pk/blog/child-labor-at-brick-kilns>

<sup>40</sup> Solidarity Center. (2021). Pakistan Report Force Labour in the brick kilns <https://www.solidaritycenter.org/wp-content/uploads/2021/03/Pakistan.Report.Forced-labor-in-the-brick-kilns.pdf>

<sup>41</sup> ILO. (2022). Child Labour in domestic work in Pakistan: A scoping study. <https://www.ilo.org/publications/child-labour-domestic-work-pakistan-scoping-study>

<sup>42</sup> '12.5 million children in Pakistan are involved in labour' (2016). <https://www.dawn.com/news/1264451>

<sup>43</sup> SOS Children's Villages <https://www.sos-childrensvillages.org/where-we-help/asia/pakistan>

<sup>44</sup> Ali, K., & Hamid, A. (1999). Major determinants of female child labour in urban Multan (Punjab-Pakistan).

<https://repository.lahoreschool.edu.pk/xmlui/bitstream/handle/123456789/4469/Karamat.pdf?sequence=1&isAllowed=y>

<sup>45</sup> Hyderabad 40 percent workers in carpet industry are children- report <https://www.dawn.com/news/314051/hyderabad-40-per-cent-workers-in-carpet-industry-are-children-report>

### 3. Hazardous conditions for children in eleven occupations

The world of employment is a precarious place for children. They are often exposed to hazardous conditions that harm their physical, psychological and emotional well-being. In Pakistan, millions of children are engaged in various occupations exposed to significant risks to their health, safety, and development. This section highlights the alarming situation of children working in eleven hazardous occupations, including coal mines, rag picking, grazing, fisheries, transport, begging, child hawkers, auto workshops, brick kilns, domestic child labour, and home-based manufacturing. The following table provides a stark reminder of the dangers faced by these children, emphasizing the urgent need for protective measures, policy interventions, and awareness campaigns to ensure the safety and well-being of Pakistan's most vulnerable population.

**Table 3: Eleven hazardous occupations and the possible working or hazardous conditions**

Occupations/processes	Characteristics of hazardous conditions for children
Coal Mines	Exposure to toxic gases, risk of mine collapses, physical strain from heavy lifting, and respiratory issues due to coal dust inhalation.
Rag Picking	Exposure to sharp objects, hazardous waste, risk of injury or infection, unhealthy working conditions, and potential contact with harmful chemicals or materials.
Grazing (herder) Children	Risk of animal attacks, exposure to extreme weather conditions, and lack of supervision, potential encounters with dangerous wildlife, and physical strain from long hours of walking.
Fisheries	Risk of drowning, exposure to waterborne diseases, handling sharp tools or equipment, physical strain from lifting heavy nets or equipment, and exposure to extreme weather conditions. In shrimp processing, children are exposed to dangers such as handling sharp tools, working in wet and slippery conditions, and facing the risk of slips, falls, and injuries.
Transport	Risk of accidents or injuries while operating vehicles, exposure to hazardous fumes or exhaust, long hours leading to fatigue, potential exploitation or abuse from employers or passengers.
Begging	Vulnerability to exploitation or abuse, exposure to harsh weather conditions, risk of accidents or injuries while navigating busy streets or intersections, and potential involvement in criminal activities.
Child Hawkers	Exposure to dangerous areas while selling goods, risk of accidents or injuries while navigating crowded streets, potential exploitation or abuse from employers or customers, vulnerability to trafficking or criminal exploitation.
Auto Workshops	Exposure to hazardous chemicals or materials, risk of burns or injuries from machinery or tools, potential inhalation of toxic fumes or exhaust, lack of safety precautions, and physical strain from lifting heavy objects.
Brick Kilns	Exposure to extreme heat and smoke, risk of burns or injuries from handling bricks or equipment, potential respiratory issues from inhaling brick dust, lack of protective gear or safety measures, and long hours leading to fatigue.
Domestic Child Labour	Exposure to physical or verbal abuse, risk of exploitation or trafficking, lack of access to education or healthcare, long hours of work with little rest or breaks, and potential exposure to hazardous household chemicals or materials.
Home Based Manufacturing (adda)	Exposure to hazardous materials or equipment, risk of burns or injuries from machinery, lack of safety precautions or supervision, long hours of work with

work)

little rest, potential exploitation or abuse from employers or family members.

#### 4. Profiles of eleven hazardous occupations

##### 4.1 Coal mines

The coal sector contributes 2.51% to Pakistan's GDP and employed 0.3% of the workforce by 2022. With 186 billion tonnes of coal reserves, the government aims to increase extraction from 4.5 to 60 million tonnes annually. Pakistan has around 400 coal mines with 100,000 workers, and over 300 miners die annually.<sup>46, 47</sup> There is no exact national and provincial numbers of child labourers in the sector in Pakistan some as young as nine, who work in KP and Balochistan's coal fields, earning up to around PKR600 a day. Children aged 7-12 years clean coal on the surface, while those aged 13-18 work inside mines excavating and transporting coal.<sup>48, 49</sup> Children descend below the surface daily to dig up thousands of tons of coal. They toil in one of the world's harshest work environments; multiple recent reports of child sexual abuse in the mines of Shahrag, in Balochistan's Harnai district, a 300-400 coal mines operated by over 30,000 men.<sup>50</sup> The town is notorious for being unsafe for boys, with men posing a constant threat. Children are brought here from KP and Afghanistan for the sole purpose of sexually abusing them.<sup>51</sup> Coal mines in Sindh indirectly suggest the use of child labour, though it has not been directly reported in the media.<sup>52</sup>

##### 4.2 Rag Picking/scavengers (a sub-category of children on the street)

Given the nature of work, rag picking (or scavenging) comes under children on the street and is considered the worst form of child labour. Rag-picking children are vulnerable to all sorts of violence, abuse and discrimination. As these children spend a considerable amount of time on the streets and without any adult supervision, they are generally harassed by the public and particularly by the police.<sup>53</sup> Waste-picking involves collecting recyclable items from dumpsites, roadside bins, and residential areas to sell to junkyard owners or middlemen. These children, often from marginalized communities such as Afghan refugees and minorities, take up waste-picking due to severe poverty and lack of other options. Starting as young as 5, most children begin waste-picking with family members. Boys dominate this labour force, with a significant portion being Afghan refugees due to their dire circumstances. These children work long hours, face extreme weather, and handle hazardous materials, leading to frequent injuries and health issues. They endure social stigma, verbal abuse, and physical violence from both work and family. Most children begin waste-picking due to family pressure and collect between 5 and 15 kilograms of waste daily. They face substantial physical violence and abuse, expressing fear of police and societal prejudice. Additionally, a significant majority are unaware of social protection programs that could aid them, highlighting a severe gap in support and regulation for these vulnerable children.<sup>54</sup> The injury rate among rag pickers was 62.8% in Pakistan which include dog bites, insect bites, faced faeces and stray animals. They often face severe health risks from hazardous waste.<sup>55</sup> Chemical fumes and airborne dust

<sup>46</sup> Ayaz, Muhammad, Noor Jehan, Joanna Nakonieczny, and Urszula Mentel. "Health costs of environmental pollution faced by underground coal miners: Evidence from Balochistan, Pakistan." *Resources Policy* 76 (2022): 102536.

<sup>47</sup> Malik, Afia. "Local Coal for Power Generation in Pakistan." *The Pakistan Development Review* (2023): 573-589.

<sup>48</sup> Freedom United. <https://www.freedomunited.org/news/debt-bondage-and-child-labor-thrive-in-pakistans-coal-mines/>

<sup>49</sup> SPARC. <http://www.sparcpk.org/Publications/Coal-Mines-in-Balochistan.pdf>

<sup>50</sup> The Guardian. <https://www.theguardian.com/global-development/2020/feb/19/coal-workers-are-orphans-the-children-and-slaves-mining-pakistans-coal>

<sup>51</sup> Shahrag, the Pakistani town where boys aren't safe from men. (2019). <https://www.dawn.com/news/1463990>

<sup>52</sup> Bodies of eight labourers retrieved from flooded mine near Sindh's Jhimpir (2022). <https://www.dawn.com/news/1698696>

<sup>53</sup> Human Rights Asia. (2009). <http://www.humanrights.asia/news/forwarded-news/AHRC-FAT-039-2009/>

<sup>54</sup> ILO. Pakistan's journey towards the elimination of child labour: A timeline [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms\\_887600.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms_887600.pdf)

<sup>55</sup> The State of Children in Pakistan (2015) <https://mohtasib.gov.pk/SiteImage/Downloads/WMS%20Committee%20report/SOCP.pdf>

cause various types of health threats, some of which begin in the place where these are inhaled.<sup>56</sup> Most are extremely poor, illiterate, and uneducated and begin picking waste at a very young age – usually between 5 and 8 years old.<sup>57</sup>

#### 4.3 *Begging children (a sub-category of children on the street)*

The ICT Police Mujahid squad identified 20 leaders of begging rings exploiting women, children as young as 4-5, and disabled persons. These individuals are forced to work long hours soliciting money or selling items. The mafia preys on destitute or homeless children, provides them with food, and coerces them into begging. Police investigations revealed that child beggary is highly organized, sometimes involving relatives and cases where children are "hired" or sold for begging.<sup>58</sup> At least a million street children in Punjab: street children as those who are found to be begging on the streets, who are lost or missing or those who run away from their homes. The category even includes infants who have been abandoned by parents.<sup>59</sup> Some children from Pakistan are kidnapped or sold into organized begging rings, domestic servitude, gangs, and child sex trafficking in Iran.<sup>60</sup>

#### 4.4 *Children Hawkers (a sub-category of children on the street)*

Various hotspots in Pakistan's cities illustrate the complex socio-economic challenges street children face especially hawkers, including exploitation, lack of education, and exposure to violence and drug addiction.<sup>61</sup> Street hawking ranks among the most egregious forms of child labour, abuse, and neglect, aligning with other exploitative practices such as using children for begging, drug peddling, nomadic lifestyles, trafficking, prostitution, and domestic servitude (ILO, 2020). The exploitation extends beyond street hawking to include begging and working as bus conductors, especially troubling in certain urban areas. Teenage Street hawking constitutes a subset of child labour, compounding the challenges faced by vulnerable children.<sup>62</sup> Scores of young street vendors blowing balloons for selling to children on a roadside in Karachi.<sup>63</sup> Child Street vendors in Peshawar sell toys and balloons they cannot afford to play with. One earns Rs500-600 with her father, while another makes Rs50-70 selling balloons. Despite being surrounded by items they yearn for; these luxuries remain out of reach as they contribute to their family's income.<sup>64</sup> Street children are vulnerable to paedophilia, and easily targeted by sexual predators while begging or selling items. They face physical and sexual abuse, molested by older boys and men, and exploited by those who feign friendship. Many become desensitized to the abuse, developing inferiority complexes that damage their self-esteem. Paedophiles prey on these children, who are left unprotected and vulnerable on the streets.<sup>65</sup>

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<sup>56</sup> Sara, H. H., Bayazid, A. R., & Quayyum, Z. (2022). Occupational health sufferings of child waste workers in South Asia: A scoping review. *International Journal of Environmental Research and Public Health*, 19(14), 8628.

<sup>57</sup> ILO. Pakistan's journey towards the elimination of child labour: A timeline [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms\\_887600.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms_887600.pdf)

<sup>58</sup> Wafaqi Mohtasib. (2022). Inquiry into the plight of street children in ict – challenges & way Forward [https://mohtasib.gov.pk/SiteImage/Downloads/Final%20Report%20of%20Street%20Children\\_Oct-22.pdf](https://mohtasib.gov.pk/SiteImage/Downloads/Final%20Report%20of%20Street%20Children_Oct-22.pdf)

<sup>59</sup> Voice PK. (2021). At least a million children on Punjab's streets' <https://voicepk.net/2021/04/at-least-a-million-children-on-punjab-streets-says-cpwb-chief/>

<sup>60</sup> Pakistan. (2022). [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2022/Pakistan.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2022/Pakistan.pdf)

<sup>61</sup> Khalid, A., Nasir, M., & Rehman, S. U. (2014). A Study to Identify the Hot Spots of Street Children in Lahore. *Pakistan Vision*, 16(1), 40-55.

<sup>62</sup> International Labour Organization (2020). Meaning of child labour. Retrieved from <https://www.ilo.org>dacts.langen>.

<sup>63</sup> Young street vendors blowing balloons for selling to children on a roadside in the port city [https://www.app.com.pk/photos-section/young-street-vendors-blowing-balloons-for-selling-to-children-on-a-roadside-in-the-port-city/#google\\_vignette](https://www.app.com.pk/photos-section/young-street-vendors-blowing-balloons-for-selling-to-children-on-a-roadside-in-the-port-city/#google_vignette)

<sup>64</sup> Express Tribune. (2015). Forbidden fruit: Toys in hand, joy at an arm's length <https://tribune.com.pk/story/869345/forbidden-fruit-toys-in-hand-joy-at-an-arms-length>

<sup>65</sup> Express Tribune. Street children succumb to paedophilia <https://tribune.com.pk/story/2447497/street-children-succumb-to-paedophilia>

#### 4.5 Grazing Children (engaged in herding activities)

In rural Pakistan, children as young as 5 years old are involved in livestock activities, herding animals and performing tasks like feeding, milking, and cleaning.<sup>66</sup> They face exploitative conditions, long working hours, and hazards like slips, falls, amputations, and electric shocks. Despite legal prohibitions, children work with dangerous machines, leading to injuries. They experience back pain, eye problems, depression, and stress, but also show resilience and confidence. Boys primarily engage in goat rearing and herding, while girls perform similar tasks, including feeding and milking. Children in the livestock sector face numerous risks and challenges.<sup>67</sup>

#### 4.6 Child labour in fisheries (deep sea fishing, fish processing)

Deep-sea fishing is a dangerous world, even for adults. Children are especially at risk due to their developing bodies and lack of experience. Rough seas, harsh weather, and extreme temperatures can lead to accidents, dehydration, heatstroke, or hypothermia. The physically demanding work of hauling equipment and battling large fish puts strain on young bodies. Long hours at sea mean sleep deprivation, making children more prone to fatigue and accidents, which perhaps is the most concerning aspect is child labour in deep-sea fishing. Children cannot advocate for themselves and may be forced to work long hours in dangerous conditions for little pay. This high incidence of child labour underscores the need for development strategies to eliminate child labour in the fisheries sector.<sup>68</sup>

In Karachi's coastal communities, child labour is rampant, particularly in the shrimp peeling industry, which is fraught with hazardous conditions for children. Families, often led by women and assisted by minor children, engage in shrimp peeling from as early as 6 am in compounds with poor sanitary conditions. The children work long hours, sometimes over 10 hours a day, without proper protective equipment. They peel frozen shrimps with their bare hands, which often leads to infections and injuries, evident from the numerous bandaged fingers. Despite these harsh conditions, the meagre earnings, such as 50 rupees per day for a family of four, are vital for their survival.<sup>69</sup>

#### 4.7 Transport (drivers and conductors)

A significant portion of Pakistan's workforce, especially in transport, is children. Coerced by poverty, they start as helpers, expected to become drivers. Isolated from families, they endure prolonged travel, miss education, vulnerable to physical, sexual, and psychological abuse, and drug addiction from senior drivers, helpers, and mechanics during their apprenticeship.<sup>70</sup> In Karachi, conductors are frequently underage, typically aged 10 to 15. Young boys, with their vigor, accept lower wages. Rickshaw owners commonly pay Rs150 to Rs250 for over 12 hours of labour.<sup>71</sup> These light tricycles, powered by 70cc engines, often carry a driver, six passengers, and a boy conductor, posing significant dangers. The risk escalates when the driver is a minor. Therefore, Qingqi driving is not classified as the worst form of child labour in Pakistan.<sup>72</sup> Also, an increasing number of children, some as young as 14 or even younger, are compelled to work as bus conductors due to economic hardships at home. Instead of attending school,

<sup>66</sup> FAO. (2013). Children's work in the livestock sector: Herding and beyond <https://www.fao.org/4/i3098e/i3098e.pdf>

<sup>67</sup> ILO. (2013). The effect of work on Report of Research on Ten Occupational Sectors in Pakistan Children's Health

<sup>68</sup> Abdul Hai, A., Fatima, A., & Sadaqat, M. (2010). Socio-economic conditions of child labor: A case study for the fishing sector on Balochistan coast. *International Journal of Social Economics*, 37(4), 316-338.

<sup>69</sup> Society: The Prawn-Peelers of Machhar Colony (2018). <https://www.dawn.com/news/1443447>

<sup>70</sup> Kayani, A., King, M., & Fleiter, J. (2018). PA 18-5-1786 Child labour and child abuse: cultural practices in commercial driver 'apprenticeship' in Pakistan.

<sup>71</sup> The Express Tribune. (2014). Too close for comfort: Female passengers uncomfortable with conductors in nine-seat rickshaws <https://tribune.com.pk/story/759259/too-close-for-comfort-female-passengers-uncomfortable-with-conductors-in-nine-seat-rickshaws>  
Children on road. (2014). <https://www.dawn.com/news/1147103>

<sup>72</sup>

they find themselves employed in public transport buses, wagons, and other modes of transportation. These young conductors face numerous challenges, including harassment from drivers and others associated with the transport industry. They get Rs150 daily to support their families, working from 8 am to 10 pm, hanging onto the back of the vehicle, and calling out for passengers. Despite hunger or fatigue, he must complete his duties to ensure he receives his daily wage, as observed at various bus stands throughout Rawalpindi city.<sup>73</sup>

#### 4.8 Auto-workshops

Many workshops employ children between the ages of 10 and 12, and sometimes even younger. Throughout 10 to 15 years, these children acquire skills in automobile repair and maintenance.<sup>74</sup> Child labourers in workshops face gruelling conditions. Many work long hours, often 8-12 per day, and some even at night. Despite electricity, extreme temperatures are common due to working outdoors without proper heating or cooling. Cluttered workshops increase the risk of slips, trips, and falls. Children are exposed to loud machinery and dust from roads and work processes, causing fatigue. Chemical hazards are prevalent, with exposure to kerosene, paints, and various solvents. Frequent headaches, back pain, respiratory problems, and eye issues are common. Alarmingly, recent injuries include amputations, highlighting the dangers of sharp tools and unguarded machinery in these workshops.

#### 4.9 Brick Kilns

In Pakistan, a shocking 72% of brick kiln workers bring their children, as young as five years old, into these hazardous environments. These children work gruelling 14-hour days making bricks, carrying heavy loads, and enduring extreme heat, dust, smoke, and toxic fumes. This leads to a multitude of health problems, including respiratory infections, skin diseases, eye problems, and injuries.<sup>75</sup> Their families live in poor conditions with limited water and sanitation. The work itself is demanding, with boys often experiencing back pain and injuries from heavy lifting. Girls, who primarily handle cleaning and food preparation, also face long hours and inadequate sanitation facilities. Compared to other child labourers, brick kiln children show higher stress, lower social integration, and more depression symptoms. This dangerous and exploitative system traps children in a cycle of poverty and ill health.<sup>76</sup>

#### 4.10 Child labour in home-based manufacturing

Home-based manufacturing, including textile, leather, footwear, and craft work, involves significant health hazards. Textile tasks like dyeing and sewing expose workers to harmful dyes and repetitive movements, leading to arthritis, muscle discomfort, and respiratory issues. Craftwork hazards include repetitive movements and dust, leading to finger deformities, vision loss, and lung diseases.<sup>77</sup> There are 8.52 million home-based workers,<sup>78</sup> with around 6 million child labourers under 10, including girls in packaging and embroidery.<sup>79</sup> Children in 'adda work' (embroidery work) were involved in hazardous jobs, including work in power looms, wandering, and kharad, which were harmful to their health. These jobs cause injuries, asthma, muscle contractions, weakening of eyesight, and respiratory diseases. Female child labourers not

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<sup>73</sup> The Express Tribune. Underage children working as bus conductors on the rise. <https://tribune.com.pk/story/2349733/underage-children-working-as-conductors-on-the-rise>

<sup>74</sup> ILO. (2023). Rapid assessment of child labour in automobile repair workshops in Pakistan [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms\\_887599.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/@ilo-islamabad/documents/publication/wcms_887599.pdf)

<sup>75</sup> Republic Policy. The rights of brick kiln children in Pakistan. <https://republicpolicy.com/the-rights-of-brick-kiln-children-in-pakistan/>

<sup>76</sup> ILO. 2013. The effect of work on children's health - Report of research on ten occupational sectors in Pakistan. <https://www.ilo.org/ipecinfo/product/download.do?type=document&id=22375>

<sup>77</sup> ILO/IPEC. (2011). Children in Hazardous Work: What We Know, What We Need to Do.

<sup>78</sup> '12.5 million children in Pakistan are involved in labour' (2016) <https://www.dawn.com/news/1264451>

<sup>79</sup> The News International. (2020). Underage workers. <https://www.thenews.com.pk/tns/detail/726874-unde-age-workers>



only face these health problems but are also teased and abused at the workplace. Most children attend schools but later on drop out, most get engaged in *adda* work and stitching. Additionally, these children work 8 to 13 hours a day.<sup>80</sup> The home-based manufacturing sector is fraught with forced or bonded labour, child labour, discrimination, and a pervasive lack of adherence to labour standards, exacerbated by the absence of an enabling environment for women's equal participation in the economy.<sup>81</sup> In Hyderabad and many other cities of Pakistan, glass bangles are decorated at homes by tender hands of young girls and boys.<sup>82</sup> Similar to numerous other industries, the practice of *peshgi* (advance payment) exists in home-based work. Children face issues like health risks and low wages. Payment is typically based on a piece-rate system.<sup>83</sup>

#### 4.11 Domestic Child Labour

Child domestic workers (CDWs) represent a significant portion of child labourers in Pakistan, often working within homes and thus remaining a "hidden phenomenon." They perform domestic tasks in third-party homes, with or without pay, differing from children doing chores in their own homes. They perform various tasks including cleaning, cooking, and babysitting, often facing harsh conditions, long hours, and restricted freedoms, akin to slavery. Many CDWs start as young as six, particularly girls, who often begin working with their mothers before taking on independent roles by age ten. They are exposed to numerous risks like electrical hazards, burns, and respiratory issues from dust. Abuse is rampant, with significant numbers of CDWs suffering violence, including severe physical and sexual abuse, sometimes leading to death.<sup>84</sup>

#### 5. Minimum age for employability: Legal inconsistencies

The minimum age for admission to work varies significantly across different laws and regions in Pakistan, leading to inconsistencies in how children are legally employed and in which sectors. These variations not only contribute to confusion and enforcement challenges but also undermine the protection of children's rights nationwide. For instance, under the Mines Act 1923, it is set at 17 years, while the Factories Act 1934 and its provincial variants enacted after devolution set it at 15 years. The Shops & Establishments Ordinance 1969 and its provincial variants in Sindh and Khyber Pakhtunkhwa also set it at 14 years, whereas the Road Transport Workers Ordinance 1961 sets the minimum age at 18 years. The Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015, and the Sindh Prohibition of Employment of Children Act, 2017, both set the minimum age for starting work at 14 years. However, the Punjab Restriction on Employment of Children Ordinance 2016 raises the minimum age to 15 years. In Balochistan, draft legislation also sets the minimum age at 14 years, while draft legislation for the Islamabad Capital Territory proposes raising it to 15 years.

The minimum age for work is set at 14 years under the Employment of Children Act 1991, currently only applicable in the Islamabad Capital Territory because all the provincial laws have abolished the ECA of 1991. After devolution, Khyber Pakhtunkhwa, Punjab, and Sindh enacted legislation raising the minimum age for hazardous work to 18 years, aligning with the provisions of Convention 138. The draft legislation for the Islamabad Capital Territory and Balochistan also raises the minimum age for hazardous work to 18 years. Additionally, the Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015, allows light

<sup>80</sup> Aqil, Zahid. 2012. "Nexus between Poverty & Child Labour: of Poverty Alleviation on Child Labour Research Report 2012

<sup>81</sup> Issues faced by home-based woman workers discussed (2024). <https://www.dawn.com/news/1820402>

<sup>82</sup> The Express Tribune. <https://tribune.com.pk/story/2462084/hyderabad-delicate-eid-bangles-go-from-furnace-to-forearms>

<sup>83</sup> ILO. A rapid assessment of bonded labour in hazardous industries in Pakistan: glass bangle-making, tanneries and construction

<sup>84</sup> Child Domestic Workers. (2022). <https://www.dawn.com/news/1727996>

work for children aged 12 and above for up to two hours per day to acquire skills, with similar provisions existing in Sindh legislation.

**Table 4: Minimum age for employment (Region and type of work)<sup>85</sup>**

Type of Work	Punjab	Sindh	Khyber Pakhtunkhwa (KP)	Balochistan	Islamabad Capital Territory (ICT)
Factories	15	14	14	14	14
Shops and Establishments	15	14	14	14	14
Road Transport	8 (21 for drivers)	-do-	-do-	-do-	-do-
Hazardous Work (Brick Kilns)	18	18	18	14	14
Light Work		14	14		NP
Mines	NP	NP	12	NP	NP
Domestic Work	14	14	14	14	14
Construction	15	NP	NP	18	14
Other Hazardous Work	15	NP	NP	18	14

Table 4 outlines the minimum age requirements for various jobs across different regions in Pakistan. It breaks down nine work categories, including factories, shops, and hazardous professions like brick kilns. Each region has a corresponding minimum age listed for each job type. It shows that some regions lack regulations for specific work categories, indicated by "No Provision." This is particularly concerning for hazardous jobs like mining and construction. Additionally, the table uses "-do-" to signify the same minimum age as the previous entry, which could be clearer if the age was simply repeated. It raises a red flag is a minimum age for hazardous work (brick kilns). While most regions require workers to be 18, Balochistan allows 14-year-olds to perform this dangerous work. This highlights a potential gap in child safety regulations across different provinces. Overall, while Table 4 offers a glimpse into minimum working ages in Pakistan, the inconsistencies and missing data suggest a need for more clear and consistent regulations, especially for hazardous work and unprotected job categories.

ILO Convention No. 138 on the Minimum Age for Admission to Employment (1973) aims to eliminate child labour by setting a minimum age for employment. In Article 1, it requires member states to pursue a national policy designed to ensure the effective abolition of child labour. Article 2 sets the minimum age for employment, which shall not be less than the age of completion of compulsory schooling and, in any case, not less than 15 years. Pakistan's ECA of 1991 and provincial laws are neither in conformity with the ILO's compulsory schooling provision nor with Article 25A of the Constitution which says free and compulsory education from 5 to 16 years.

<sup>85</sup> Table is taken from Ahmad, I. (2017). Child Labour: Lack of Coherent Reforms in Pakistan. <https://clr.org.pk/wp-content/uploads/2020/06/Child-Labour.-Lack-of-Coherent-Reforms-in-Pakistan.pdf>; updated with new legislative developments in provinces

## 6. Committees

In all four provinces, for tackling child labour, advisory committees have to be established. These committees share a unified goal of eradicating child labour and ensuring compliance with both national and international standards. The inclusion of diverse representation from government, employers, workers, and civil society is a common approach, reflecting a comprehensive effort to address the issue from multiple perspectives.

However, there are notable differences in the structure and specifics of these committees. Sindh's committee is larger and includes provincial assembly members, which could provide stronger legislative support and oversight. Punjab's committee, while similar in structure to those in KP and Balochistan, includes a slightly different composition in terms of member numbers. Additionally, both Sindh and Punjab place a specific focus on setting or proposing the minimum age for employment, which is not explicitly mentioned in the mandates for KP and Balochistan's committees.

In the first place, the committees' presence or existence is not confirmed. Thus, their activities and performance are not known to civil society. However, differences given in these laws have or could influence the effectiveness and approach of each committee in addressing child labour within their respective provinces. The inclusion of provincial assembly members in Sindh's committee, for example, might facilitate more robust legislative action, while the precise size and composition of committees in other provinces might impact their operational dynamics and breadth of representation.

Overall, while the committees share a common foundation in their purpose and representation, the variations in their structure and specific mandates reflect tailored approaches to the unique legislative and administrative contexts of each province.

**Table 5: Provincial committees**

	Sindh	KP	Balochistan	Punjab
Committee Name	Sindh Coordination Committee on Child Labour (CCCL)	KP CCCL	Balochistan CCCL	Provincial Committee on Child Labour
Purpose and Function	Advise on legislative, and administrative measures for child labour eradication as per international instruments	Advise on legislative, and administrative measures for child labour eradication as per national and international instruments	Advise on legislative, administrative measures for child labour eradication as per national and international instruments	Advise on legislative, administrative measures for child labour eradication and propose the minimum age for employment
Number of Members	Chairperson + at least 9 members	Chairman + 7 members	Chairman + 7 members	Chairperson + not more than 8 members
Representation	Govt., employers, workers, civil society, 2 MPAs	Government, employers, workers, civil society	Govt., employers, workers, civil society	Govt., employers, workers, civil society

Provincial Assembly Members	Yes	No	No	No
Setting Minimum Age for Employment	Tasked with setting the minimum age for employment	Not specifically mentioned	Not specifically mentioned	Tasked with proposing the minimum age for employment
Notification and Functioning	Not specified	Functions and manner to be prescribed	Functions and manner to be prescribed	Not specified

## 7. Overtime, night time and other matters

Across provinces, the regulations governing adolescent labour exhibit a strong commitment to protecting young workers from excessive working hours and ensuring their well-being. The common threads in these regulations reflect a unified approach to child labour, emphasizing rest periods, prohibition of night work, and preventing multiple employments on the same day. These similarities demonstrate a nationwide recognition of the vulnerabilities associated with adolescent labour and a shared goal of safeguarding young workers.

However, each province introduces specific nuances that tailor the regulations to their unique contexts. KP and Sindh's strict prohibition of overtime aligns with a more protective stance, ensuring that adolescents are not overburdened. Punjab's inclusion of provisions to accommodate educational or vocational training schedules highlights the importance of balancing work and education, which is crucial for the holistic development of adolescents.

**Table 7: Overtime, night time and other matters in provinces**

	KP	Sindh	Punjab	Balochistan
Max Continuous Work Hours	3 hours	3 hours	3 hours	3 hours
Rest Interval	At least 1 hour	At least 1 hour	At least 1 hour	At least 1 hour
Total Work Period (including rest)	Not to exceed 7 hours	Not to exceed 7 hours	Not to exceed 7 hours	Not to exceed 7 hours
Night Work Prohibition	7:00 p.m. to 8:00 a.m.	7:00 p.m. to 8:00 a.m.	7:00 p.m. to 8:00 a.m.	7:00 p.m. to 8:00 a.m.
Overtime Work	Not permitted	Not permitted	Not permitted	Permitted up to 8 hours per week, with overtime pay
Multiple Employment	Not permitted to work in more than one establishment per day	Not permitted to work in more than one establishment per day	Not permitted to work in more than one establishment per day	Not permitted to work in more than one establishment per day

Educational/ Consideration	Vocational	Not specifically mentioned	Not specifically mentioned	Work hours must not conflict with educational or vocational training	Not specifically mentioned
Overall Work Hours Cap		Not to exceed 7 hours	Not to exceed 7 hours	Not to exceed 7 hours	Not to exceed 8 hours per day, including overtime
Differentiation "Young Person" and "Adolescent"	Between	No	No	No	Yes
Special Provisions for Education		No	No	Yes	No

Balochistan's allowance for overtime, with a cap and mandatory overtime pay, introduces a degree of flexibility that could be seen as recognizing the economic realities and labour demands of the region. This approach, while more permissive, still aims to protect young workers by capping overtime hours and ensuring they are compensated fairly.

Overall, the variations among the provinces reflect different strategies to address the complex issue of child labour while maintaining a core commitment to the protection and development of adolescents. These differences underscore the importance of context-specific regulations that consider regional labour markets, educational needs, and economic conditions.

## 8. Notice to Inspector

**Table 8: Provisions related to notices by the employers to the inspectors**

	KP	Sindh	Baluchistan	Punjab
<b>Notice Contents</b>				
Name, location, and address	Yes	Yes	Yes	Yes
A person in the actual management	Yes	Yes	Yes	Yes
Address for communication	Yes	Yes	Yes	Yes
Nature of occupation/process	Yes	Yes	Yes	Yes
Name and particulars of adolescents	Yes	No	No	Yes
<b>Exemptions</b>				
Educational/training institutions	Not specifically mentioned	For learning skills only	Not specifically mentioned	Exempt from sections 6, 7, and 8
Young Person Specifics	No	No	Includes "young person" along with adolescents	No

All four provinces require occupiers to notify the inspector within 30 days of either the commencement of the Act or the employment of an adolescent. The notice must include the name, location, and address of the establishment; the person in actual management; the address for communication; and the nature of the occupation or process carried out in the establishment. Additionally, all provinces exempt family-run establishments and government-recognized schools from certain sections of the Act.

In KP and Punjab, the notice requirements explicitly include the names and particulars of the adolescents, while Sindh and Balochistan do not require these details. Regarding exemptions, KP, Sindh, and Balochistan apply exemptions to sections 7, 8, and 9 of the Act, whereas Punjab applies exemptions to sections 6, 7, and 8. Punjab specifically exempts educational and training institutions recognized by various government bodies, while Sindh exempts schools established, assisted, or recognized by the government for learning skills; KP and Balochistan do not specifically mention educational or training institutions in their exemptions. Additionally, Balochistan includes "young person" along with adolescents in its regulations, a distinction not made by KP, Sindh, and Punjab.

## 9. Dispute on age

Table 9: Child Labour Dispute Resolution across Pakistani Provinces

	Sindh	KP	Balochistan	Punjab
Dispute Parties	Inspector and occupier	Inspector and occupier	Inspector and occupier	Inspector and occupier
Subjects of Dispute	Age of any child or adolescent	Age of any adolescent or child	Age of any child	Age of any child or adolescent
Initial Reference	Certificate as to the age granted by prescribed medical authority	Certificate as to the age granted by the prescribed authority	Certificate as to the age granted by prescribed medical authority	Registration certificate (Form-B) issued by NADRA or a birth certificate issued by a competent authority
Secondary Reference	Referred by the Inspector to the prescribed medical authority	Referred by the Inspector to the prescribed medical authority	Referred by the Inspector to the prescribed medical authority	Referred by the Inspector to the prescribed medical authority if primary documents are absent
Final Authority	Prescribed medical authority	Prescribed medical authority	Prescribed medical authority	Prescribed medical authority
Conclusive Proof	The decision of prescribed medical authority	The decision of prescribed medical authority	The decision of prescribed medical authority	The decision of prescribed medical authority shall be conclusive proof
Primary Documentation	Absent	Absent	Absent	Form-B or birth certificate as primary evidence

All provinces specify that disputes arise between the Inspector and the occupier regarding the age of a child or adolescent employed or permitted to work. In the absence of an initial age certificate, all provinces require the matter to be referred by the Inspector to the prescribed medical authority. The decision of the prescribed medical authority is considered conclusive proof of the age of the child or adolescent in all provinces.

However, there are differences in how the provinces address these disputes. Sindh and KP include both children and adolescents in their regulations, while Balochistan only mentions children. Punjab, like Sindh and KP, includes both children and adolescents. When it comes to initial references for age verification, Sindh, KP, and Balochistan primarily rely on a certificate granted by the prescribed medical authority. In contrast, Punjab first refers to the registration certificate (Form-B) issued by NADRA or the birth certificate issued by the competent authority, and only in the absence of these documents does it refer to the prescribed medical authority. Additionally, while Sindh, KP, and Balochistan do not specify any primary documentation other than the certificate by the medical authority, Punjab specifies Form-B or a birth certificate as primary documentation before referring to the medical authority.

10. Health and safety rules				
Table 10: Health and Safety Rule-Making for Young Workers				
	KP	Balochistan	Punjab	Sindh
Health and Safety Rules	The govt. shall, by notification, make rules for the health and safety of adolescents or children employed or permitted to work in any establishment or class of establishments	Government may, by notification in the official Gazette, make rules for the health and safety of children and young persons employed or permitted to work in any establishment or class of establishments.	No provisions	No provisions
Specific Provisions	Not specified	Specifies detailed provisions covering: cleanliness, disposal of wastes and effluents, ventilation and temperature, dust and fumes, artificial humidification, lighting, drinking water, latrine and urinals, spittoons, fencing of machinery, work at or near machinery in motion, restrictions on and regulations of employment of adolescents and young persons on dangerous machines.	Not applicable	Not applicable
Scope	Adolescents or children	Children and young persons	Not applicable	Not applicable
Legislative Authority	Govt. mandated to make rules	The Govt. has the discretion to make rules	Not applicable	Not applicable

Both KP and Balochistan empower the government to make rules regarding the health and safety of children and adolescents employed or permitted to work in establishments. These provisions aim to

protect young workers, with KP focusing on children and adolescents, and Balochistan including children and young persons.

There are notable differences between the two provinces in their approach. KP uses the word "shall," indicating a mandatory requirement for the government to make health and safety rules. In contrast, Balochistan uses the word "may," indicating that it is at the government's discretion to make such rules. Additionally, KP's provision is general and does not specify particular areas of health and safety to be covered by the rules. Balochistan, however, provides a detailed list of specific areas that the health and safety rules may cover, including cleanliness, waste disposal, ventilation, temperature, dust and fumes, artificial humidification, lighting, drinking water, latrines and urinals, spittoons, fencing of machinery, work near machinery in motion, and regulations on employment on dangerous machines.

Moreover, KP's rules are broad and general in scope, focusing on the necessity of rule-making without delving into specific details. On the other hand, Balochistan offers a comprehensive and detailed framework for what the health and safety rules should include, providing clear guidance on various aspects of workplace health and safety.

In contrast to KP and Balochistan, both Punjab and Sindh do not have specific provisions regarding the health and safety of children and adolescents in their labour laws. This indicates a potential gap in the legal framework for protecting young workers in these provinces.

KP and Balochistan have taken steps to address the health and safety of young workers, with Balochistan providing a more detailed and specific framework. In contrast, Punjab and Sindh currently lack explicit provisions in this area, highlighting an opportunity for potential legislative development to ensure comprehensive protection for young workers across all provinces.

#### 11. Educational and Non-Discrimination Provisions for Child Labour

Both Sindh and Balochistan recognize the importance of ensuring education for children and adolescents, albeit through different mechanisms. Additionally, both provinces emphasize non-discrimination in enforcing labour laws.

**Table 11: educational and non-discrimination provisions for child labour in provinces**

	Sindh	KP	Balochistan	Punjab
Occupier's Responsibility towards Education	The occupier must ensure that adolescents (under 16 years) working in the establishment, or children acquiring skills, undergo compulsory schooling as required under Article 25A of the Constitution.	No provisions	Work performed by adolescents or young persons, as part of education or training, must comply with relevant conditions set by the Act.	No provision
Documentation Requirement	The occupier must keep documentary proof of the adolescent or child's education for inspection by the competent authority.	Not applicable	Not specified	Not applicable



Protection against Discrimination	No discrimination based on gender, religion, political affiliation, sect, colour, caste, creed, or ethnic background in enforcing the Act.	Not applicable	Not specified	Not applicable
Analysis	Sindh mandates that occupiers ensure education for working adolescents and children, with provisions for documentation and protection against discrimination.	KP lacks provisions concerning education for working adolescents or children.	Balochistan emphasizes compliance with conditions for education or training-related work, along with wage equality for young workers.	Punjab does not address the responsibility of occupiers towards education or protection against discrimination in its labour laws.

However, there are distinct differences between the two provinces. Sindh specifically mandates compulsory schooling for adolescents and children working in establishments, along with documentation requirements and protection against discrimination. In contrast, Balochistan focuses on ensuring compliance with conditions for education or training-related work and emphasizes wage equality for young workers. KP and Punjab lack provisions addressing the responsibility of occupiers towards education or protection against discrimination, representing potential gaps in the legal framework for child labour protection.

The presence of provisions in Sindh and Balochistan highlights efforts to safeguard the education and rights of working children and adolescents. The absence of similar provisions in KP and Punjab suggests areas for potential legislative development to strengthen protections for child and adolescent workers.

## 12. Comparison of national and provincial laws on child labour and child protection

In the following Table, we can see details about the classification of various professions and occupations as hazardous under the ECA and other national laws that remain in effect. While the ECA broadly prohibits scavenging and rag-picking and identifies exposure to coal dust as hazardous, it does not directly address coal mining, which is explicitly prohibited for children under 15 by Article 26 of the Mines Act of 1923. Rag picking, interrelated with scavenging, is prohibited under the ECA. Fisheries-related jobs, including deep-sea fishing and fish processing, are declared hazardous under the ECA, while child labour in cotton sectors and domestic work are not specifically covered. The Road Transport Workers Ordinance 1961 prohibits children from working as drivers, though it is unclear regarding conductors. Begging, or forced begging, is addressed under Section 7 of the West Pakistan Vagrancy Ordinance 1958. Other sectors, such as auto workshops, brick kilns, and various forms of home-based manufacturing, have unclear or no explicit prohibitions. The ECA and other national laws thus show a patchwork of regulations, highlighting the need for comprehensive and consistent legal protections for child labour across different sectors.

The table also outlines the classification of eleven occupations and professions as hazardous or not under provincial child protection and labour laws. For coal mines, while provincial child protection laws do not provide specific prohibitions, the Balochistan Assembly passed a resolution in 2019 against child labour in coal mines, particularly highlighting the exposure to coal dust. Rag picking is prohibited under section 36B

of the Punjab Destitute Neglected Children Act (PDNCA) of 2006 and all provincial child labour laws, which ban scavenging. However, grazing children and child labour in the cotton sector are not addressed in these laws.

Fisheries-related work, such as deep-sea fishing and fish processing, is prohibited in all provincial child labour laws, though these bans are not effectively enforced in Khyber Pakhtunkhwa (KP), Punjab, and the Islamabad Capital Territory (ICT). The transport sector sees clear prohibitions against children working as drivers and conductors in all provincial child labour laws, though specific references in child protection laws are unclear.

Begging or forced begging is addressed by various provincial child protection laws, including the Sindh Children Act of 1955, the Sindh Child Protection Authority Act of 2011, the KP Child Protection and Welfare Act of 2010, the Punjab Domestic Workers Act of 2019, and the Punjab Vagrancy Ordinance of 1958. However, there are no specific prohibitions for child hawkers and auto workshop labourers, with both categories remaining unclear under current laws.

Brick kiln labour is addressed under the Punjab Prohibition of Child Labour at Brick Kilns Act (PPCLBKA) of 2016, which prohibits employing children under 14 years of age. Domestic child labour is regulated by the Punjab Domestic Workers Act of 2019, which prohibits the employment of children under 15 years, with additional regulations in Balochistan and the ICT under the ECA. Home-based manufacturing, such as adda work or hand embroidery, is not specifically addressed in provincial child protection laws, but carpet weaving is prohibited in all provincial child labour laws. These regulations illustrate a patchwork of protections with significant gaps and inconsistencies that hinder comprehensive enforcement and protection for child workers across different regions and sectors.

**Table 6: Provisions related to eleven occupations/professions: declared hazardous or not**

Type of professions/ occupations	Declared hazardous in ECA, 1991 (through repealed across the country- except for the ICT)	Declared hazardous in the national laws (other than ECA), which are still implementable	Declared hazardous in provincial child protection laws including the PPCLBKA of 2016	Declared hazardous in provincial child labour laws [The PRECA of 2016; the KPPECA of 2015, the SPECA of 2017, the BECPRA of 2021] and policies
Coal Mines	Not direct, but says: "Exposure to coal dust" is hazardous	-Article 26 of the Mines Act of 1923 prohibits child labour in mining or mining activity below ground. A child means a person who has not completed his 15 years.	-NP (Not provided)	-In 2019, the Balochistan Assembly passed a resolution against child labour in coal mines - 'exposure to coal dust'

Rag Picking	-all types of scavenging are prohibited; scavenging and rag-picking are interrelated activities	NP	- The PDNCA of 2006 does not ban rag-picking by children; criminalizes child rag-picking	-scavenging is prohibited in all provincial child labour laws
Grazing Children	NP [not provided]	NP	NP	NP
Child labour in the cotton sector	No	NP	NP	NP
Fisheries (deep sea fishing)	Yes	NP	NP	-prohibited in all provincial child labour laws (but of no use in KP, Punjab, the ICT)
Fisheries (fish processing)	Yes	NP	NP	-prohibited in all provincial child labour laws
Transport (driver)	Yes	The Road Transport Workers Ordinance 1961	-unclear	-prohibited in all provincial child labour laws
Transport (conductor)	It may come under ECA, but not sure	-NP	-NP	- prohibited in all provincial child labour laws
Begging (or forced begging)	NP	-Section 7 of the West Pakistan Vagrancy Ordinance 1958	-The PDNCA of 2006 does not ban child begging but criminalizes child begging -The Sindh Children Act 1955 -the Sindh Child Protection Authority Act of 2011 -The KP Child Protection and Welfare Act of 2010 -The Punjab Domestic Workers Act of 2019 - the Punjab vagrancy ordinance of 1958 --the PDNCA of 2004	-NP
Child hawkers	NP	NP	NP	-NP
Auto Workshops	NP	-unclear	-unclear	-unclear
Brick Kilns	NP	NP	-The PPCLBKA of 2016 [under 14 years of age]	-unclear

Domestic Child Labour	NP but only in the ICT	NP	-The Punjab Domestic Workers Act of 2019 [under the age of 15 years]	-only in Balochistan and the ICT ECA
Home Home-based manufacturing (adda work or hand embroidery)	NP	NP	-NP	NP
Home Home-based manufacturing (carpet weaving)	Yes	NP	-NP	-prohibited in all provincial child labour laws

### 13. Challenges

The challenges surrounding child labour laws in Pakistan are multifaceted and deeply rooted in legal inconsistencies and gaps across provinces. One significant issue lies in the variation of minimum working ages, with disparities between provinces leading to confusion and complicating enforcement efforts. Additionally, the repeal of the Employment of Children Act of 1991 by most provinces except ICT has left a fragmented legal framework, causing significant disparities in child labour laws across the country.

Another challenge arises from the lack of uniform recognition of hazardous occupations across provincial laws, despite international standards identifying eleven professions as hazardous. This inconsistency poses significant enforcement challenges and hampers efforts to protect children from harmful work environments.

The scattering of important provisions related to child labour across various national and provincial laws further exacerbates the issue, leading to inconsistencies and confusion in enforcement and punishment determinants for the perpetrators. Additionally, differing minimum working ages across provinces create further confusion.

Moreover, the absence of consistent political commitment at both federal and provincial levels, coupled with poor coordination between governments, has hindered the implementation of uniform child labour policies and laws. This lack of coordination has resulted in fragmented efforts and inconsistent enforcement practices.

Provincial labour departments also face challenges due to limited capacity and resources, hindering their ability to monitor and enforce child labour laws effectively. Economic pressures and high poverty rates force children into labour, further complicating enforcement efforts. Additionally, deeply ingrained cultural norms accepting child labour and resistance from communities and employers reliant on cheap child labour add layers of complexity to eradication efforts.

Low levels of public awareness about the harmful effects of child labour and insufficient advocacy efforts further impede progress in combating the issue. Complex legislative processes, bureaucratic red tape, and insufficient data and research on child labour prevalence and nature contribute to gaps in protection and enforcement.

## 14. Discussion and conclusion

The child labour laws in Pakistan, spanning KP, Sindh, Balochistan, and Punjab, share similarities and notable differences in their definitions, prohibitions, and specific provisions. Each province has outlined definitions for "hazardous work" and "light work," along with regulations regarding the employment of children and adolescents.

In KP, hazardous work encompasses activities likely to harm the health, safety, or morals of children and adolescents, with specific occupations listed in a schedule. Light work, permitted for children aged 12 and above, is allowed for skill acquisition purposes, with a maximum daily duration of two hours alongside a family member. Similarly, Sindh and Balochistan define hazardous work in parallel with KP, detailing specific occupations posing risks to health, safety, or morals. Light work is allowed in both provinces, with Balochistan setting an age range of 12-14 and emphasizing that it should not interfere with schooling or vocational training.

Conversely, Punjab defines hazardous work specifically concerning adolescents and lists occupations accordingly but does not define light work. The province prohibits the employment of children in any establishment and bans adolescents from hazardous work. Punjab's unique addition is the establishment of a Provincial Committee on Child Labour, responsible for advising on legislative measures and proposing minimum employment ages, a feature absent in other provinces.

While there are similarities across provinces regarding the definition of hazardous work and prohibitions, differences arise in the specifics of light work definitions, age limits, and provisions for vocational training. Punjab stands out with its committee formation, which is absent in other provinces.

In conclusion, while efforts have been made to address child labour through legislative measures, there are critical issues within the legal framework, such as the inconsistent recognition of hazardous occupations and the scattering of relevant provisions. These inconsistencies pose enforcement challenges and hinder comprehensive legal reform, necessitating a unified approach to protect children's rights effectively and comply with international standards.

## 15. Recommendations

Addressing challenges analysed in this policy brief requires concerted efforts at both federal and provincial levels to harmonize laws, enhance enforcement mechanisms, raise public awareness, and improve advocacy efforts to effectively combat child labour in Pakistan.

By adopting the following key recommendations, Pakistan and its provinces can create a more consistent, effective, and protective legal environment for all children, ensuring their rights are upheld and their well-being is prioritized:

1. **Comprehensive and uniform legal framework:** The intra-provincial legal commissions of experts should be established to oversee legal inconsistencies and ensure harmonization.
2. **Standardization of minimum age:** To ensure consistency and alignment with international standards, Pakistan should adopt a minimum age of 18 for employment of children in hazardous work, as outlined in Convention 138 of the International Labour Organization (ILO).

3. Harmonization of hazardous occupation classification and standardization of hazardous work definitions: Provinces should align their definitions of hazardous occupations with international standards by adopting a standardized list of hazardous professions and clarifying regulations for sectors currently lacking explicit prohibitions. To ensure consistency, this involves explicitly prohibiting hazardous work such as coal mining and deep-sea fishing in all provincial child labour laws, mirroring the prohibitions found in national laws.

Provincial legislation harmonization:

- In light of Article 25-A of the Constitution, introduce a unified minimum age of 17 for admission to work full time across all provinces and territories.
- Raise the minimum age for hazardous work uniformly to 18 years across all regions.
- Incorporate clear, standardized provisions for light work across all provinces, ensuring it does not interfere with education or development
- Include 11 identified occupations in the list of banned occupations in the provincial laws

Clarification of regulations for specific sectors: Provinces need to clarify regulations for sectors currently lacking explicit prohibitions. For example, auto workshops and child hawkers remain unclear under current laws. Clear guidelines should be established to prohibit child labour in these sectors, ensuring comprehensive protection for all children.

Unified committees: Establishing unified advisory committees on child labour across all provinces can facilitate coordinated efforts to eradicate child labour and ensure compliance with national and international standards. These committees should be transparent and accountable, tasked with proposing and monitoring the minimum age for employment.

Streamlined dispute resolution: Harmonizing the dispute resolution process for verifying the age of child and adolescent workers is essential for consistency and fairness. Clear criteria for age verification and standardized procedures for resolving disputes should be established including birth certificates, CNIC and other relevant documents.

Comprehensive health and safety regulations: All provinces should enact comprehensive health and safety regulations tailored to protect children and young workers. These regulations should cover essential aspects such as working conditions, and working hours, cleanliness, waste disposal, ventilation, temperature control, and restrictions on hazardous machinery.

Standardization of educational provisions: All provinces should ensure that occupiers/employers are responsible for facilitating compulsory schooling for working adolescents and children, similar to Sindh's mandate. This should include documentation requirements to track compliance and protect against discrimination based on gender, religion, or ethnicity.

Alignment of begging prohibitions: Begging or forced begging is addressed differently across provincial laws, leading to inconsistencies in protection. Provinces should align their laws to explicitly prohibit child begging and ensure adequate support and rehabilitation services for affected children.

Uniformity in transport sector regulations: Regulations regarding child labour in the transport sector vary across provinces, leading to confusion. Clear prohibitions should be established against children working as drivers and conductors in all provincial child labour laws, ensuring consistency and protection for children in this sector. Banning drivers under 18 from entirety.

Expansion of domestic child labour prohibitions: Domestic child labour is regulated differently across provinces, with some laws lacking explicit prohibitions. Provinces should expand prohibitions on domestic child labour to cover all regions, ensuring that children are not exploited in private households. Putting a complete ban on full time employment under the age of 18 years.

Comprehensive coverage of home-based manufacturing: Home-based manufacturing, such as adda work or hand embroidery, remains unaddressed in provincial child protection laws. Provinces should include clear regulations to prohibit child labour in all forms of home-based manufacturing, providing comprehensive protection for children in these sectors and regular monitoring of such facilities by labour inspectors.

Increase budget for labour inspectors: Boost funding to ensure more frequent and effective inspections for child labour violations including in the agriculture sector.

Expand capacity building for labour inspectors: Provide specialized training on identifying and addressing child labour issues for inspectors.

Launch comprehensive media and social media campaigns: Raise awareness about the dangers of child labour and promote reporting through widespread campaigns.

Advocate for consistent child labour laws: Push for uniform, stringent child labour laws to ensure comprehensive protection for children across all regions.

# UNCRC Article 12

Every child has the Right to say what they think should happen and have their views listened to.



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