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## **Forced Conversion in Pakistan and International Human Rights Law: Evaluating Pakistan's Compliance with The ICCPR in Cases of Forced Conversion of Minority Girl**

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### **Abstract**

Pakistan ratified international human rights treaties like ICCPR, CEDAW and CRC, so there is binding obligation on Pakistan to secure right to life, right to liberty, freedom of expression, freedom of religion etc. Over the last decade, forced conversion of minority girls embossed as a constant human right concern in Pakistan, lifting an important questions about Pakistan compliance with its obligations under the international human rights treaties, specially the international Covenant on civil and Political Rights (ICCPR). In spite of ICCPR and constitutional guarantees of equality, liberty and religious freedom, reports is ongoing to highlight cases where Christian, Hindu, parsis and other underage non muslim girls are kidnapped, converting them to Islam by force, and later on married to their kidnapper. This research paper evaluates Pakistan's current legal frame work, judicial decisions, and institutional practices in light of ICCPR articles. It also evaluate the recent reforms and State commitments to the United Nations Human Rights Committee. The paper concludes by identifying constant challenges, view of Islamic law regarding forced conversion and suggesting that, by domestication of international human rights laws and administrative improvements can convert Pakistan's paper commitments in to lived protection of the rights of minority girls against forced conversion to Islam.

**Keywords:** Forced conversion, Religious minorities, legal framework, Human rights, Pakistan, ICCPR

### **Introduction**

Forced conversion occurs when an individual is compelled to change their religious beliefs through the use of force or pressure, which can be physical, emotional, or psychological. A common method employed for this purpose involves abducting the victim and subjecting them to coercion, threats, and intimidation, forcing them to choose between enduring abuse or converting.<sup>1</sup> Forced conversion of religious minorities in Pakistan is one of the most suppressing human rights challenges confronting the state in today era. It particularly affecting Hindus, Christians, parsis and Sikhs. These groups face extensively economic, sociocultural, and gender-based infirmities, especially in Sindh where majority of Hindu population resides. Despite of guarantying religious freedom by constitution of Pakistan and its binding on state due to commitment under the international covenant on civil and political rights ICCPR, the issue intact particularly with alarming regularity In Pakistan. Cases consistently highlights that young Hindu girls being abducted, forcibly converted to Islam and subsequently married to Muslim man are frequent. It also highlights religious intolerance and patriarchal practices.<sup>2</sup> Religious leaders often play a direct role in these conversion, framing them as religious obligations. This Disturbing dynamic emphasize on how religion and socioeconomic dependence connecting to maintain inequality and injustice in the country.<sup>3</sup> These incidents not only represent violation of state domestic laws but also constitute breach of international human right treaties that is binding on state.

The issue of forced conversions cannot be inspect solely as isolated occurrence. Instead, it must be realize with in comprehensive framework of Pakistan religio-political landscape and structural inequalities, where the interaction of economic dependency, religion and social hierarchy strengthen minority vulnerability. Research indicates that numerous Hindu households struggle with poverty and depend on affluent Muslim landowners, resulting in a power disparity that can be easily manipulated. This reliance heightens their vulnerability to coercion, particularly concerning the forced conversion of young females. Often, these incidents are supported or sanctioned by religious authorities, which significantly complicates the ability of Hindu families to oppose or pursue justice.<sup>4</sup> Law enforcement agencies are often complex or ineffective, and socio-political pressures prevent victims from obtaining justice. The intersection of economic vulnerability, religious oppression, and weak legal protections leaves minority communities, especially in rural Sindh, in a precarious position.<sup>5</sup>

Although constitution of Pakistan guarantees every citizen the right to practice, declare and propagate their religion.<sup>6</sup> So there remain stark gap between law and implementation. Even the legislative effort such as

protection of minority bill 2016, the protection of persons against forced religious conversion bill 2019 try to introduce legal protection against forced conversion, but still these bills were not enacted because they confronted very bad opposition from religious groups, and it is proof of ,that how religious power and political influence inhibit meaningful reform. Victims often denied justice as a legal system of forced conversion. Furthermore, it is largely ineffective in dealing with criminals. Highlighting the weakness of Pakistan's judicial and law enforcement institutions.<sup>7</sup>

The issue of forced religious conversion in Pakistan has received significant attention. International attention, with several human rights organizations condemning the Pakistani government's failure to protect its religious minorities. Reports from the United Nations Human Rights Council and Amnesty International have urged Pakistan to uphold international human rights standards and ensure religious freedom for all citizens.<sup>8</sup> International monitors have consistently urged Pakistan to harmonize its national law with its international obligations and to maintain the principles established in article 18 of the ICCPR, which guarantees freedom of religion and thought. Also the convention on the elimination of all form of discrimination against women (CEDAW) protect minority women from discrimination and convention on the right of the child (CRC) clearly prohibit the forced conversion of children.<sup>9</sup>

This gap between Pakistan's international commitments and its domestic legal framework is also apparent in the Cairo Declaration on Human Rights in Islam.<sup>10</sup> While the Cairo Declaration emphasizes Islam as the "religion of true unspoiled nature" and prohibits any form of coercion regarding religious conversion. However, it does not establish a clear right to freedom of thought, values, and religion as outlined in the ICCPR. Instead, all rights outlined in the Cairo Declaration are conditional upon Islamic Sharia law, which can often be interpreted in ways that conflict with international human rights norms.

This study discuss Pakistan compliance with international human right law, role of Pakistani judiciary and enforcement institution. it also explore the psychological consequence of forced conversion and some challenges to human rights compliance . At last it evaluate the view of Islamic law about forced conversion. This study seeks to point out systematic failure and promote right based approach line up with Pakistan international obligation.

### **Pakistan Compliance With International Human Right Standard: Between Ratification And Reality.**

Several important international human rights treaties, including the Convention on the Rights of the Child (CRC), CEDAW, and the ICCPR,

have been ratified by Pakistan. This ratification reflects a commitment to uphold the principles outlined in these agreements. However, ratification alone does not guarantee compliance. Pakistan has faced various internal and external challenges in meeting its international obligations.<sup>11</sup>

It is essential to integrate treaty commitments into national laws and policies to fulfill international human rights obligations. This process has been uneven and challenging in Pakistan. For instance, freedom of religion, personal liberty, protection from coercion, gender-based violence, forced conversion of minority girls and discrimination against women; especially minority girls, continue to exist despite the ratification of CEDAW, ICCPR and CRC. Additionally, issues such as one have to adopt any religion of his own will and to live freely with freedom of expression are hindering the implementation of the ICCPR. Accountability and transparency in human rights activities depend on effective monitoring and reporting procedures. Pakistan is required to submit regular reports detailing its progress in fulfilling its human rights obligations to international organizations, including the UN Human Rights Council. However, these reports are often criticized for inaccuracies or lack of completeness.<sup>12</sup>

One reason for this non-compliance is Pakistan legal dualism, treaties are not automatically enforce in courts, they require proper legislation. Due to this, ICCPR protections remain persuasive than binding in forced conversion litigation.<sup>13</sup> Also the courts and law enforcement agencies' treat forced conversion cases as private family matter rather than human right violation.

### **Lack Of ICCPR Domestication In Pakistan Legal System.**

Pakistan ratify the international covenant of civil and political right in 2010 and there after immediately it created an obligation on government to protect right to freedom of religion of minorities from forced conversion.<sup>14</sup> While national law like article 20 of constitution and 498-B of PPC excessively cited, they both are not analyze through of ICCPR obligation nor the principle of pacta sunt servanda.<sup>15</sup> So as result the court are treating the abduction and forced conversion complaint as a ordinary matrimonial disputes rather than as violation of treaty law and article 20 of constitution of Pakistan.<sup>16</sup> Article 20 of constitution and article 18 of ICCPR clearly forbid forced conversion impairing the freedom to have a religion, victims goes due to the coercion for complaints and to get justice before domestic tribunals ; however judges habitually dismiss the petition of parents of minority girls on the ground that the converted girl is now Muslim and therefore beyond the jurisdiction of there natal family.<sup>17</sup>

In past decade parliament attempted two time to protect minorities from forced conversion –first in 2015 with criminal law (protection of minorities) bill and second in 2019 with the protection of forced religious conversion bill. But unfortunately both bills were not passed when religious lobbies denunciate any waiting period or age verification period as un islamic. The UN Human right committee has repeatedly warned the Pakistan by not fulfilling its duty under ICCPR.<sup>18</sup>

So Pakistan required effective domestication, First we need a comprehensive law for forced conversion regardless of victim age and make a three month mandatory reflection period for holding any conversion certificate abeyance.

### **Pakistani Judiciary Fail To Apply International Standards In Forced Conversion Adjudication.**

Pakistani courts most of the time ignore international standards embedded in the international human right law when they decide forced conversion cases. Because Pakistani has never legislated an implementing law, judges are not bound to apply article 18 of ICCPR, which clearly prohibit forced conversion. But at that movement the abductor immediately make a nikkah certificate and on that day a free will certificate, the hearing begin with a simple question whether the girl is validly married or not? And then the kidnapping charge is re-labelled with a simple ordinary matrimonial disputes. At last the burden come on the minor's parent, to proved that she is forcibly converted or coerced, a burden which is impossible under the current Pakistani procedure.<sup>19</sup>

The superior court in Rinkle Kumari 2012 case, a sixteen year old girl, accepted her statement as a conclusive proof that she had embraced Islam with her consent; it never looked that whether her age want the safeguard mentioned in article 24 of ICCPR and in CRC. Now lower courts follow that precedent and they record the victim age 18 on strength of conversion certificate because the abductor make the conversion certificate and write her age 18 and they treat that subsequent marriage as ipso-facto valid, and close the abducting file without any further investigation regarding forced conversion .

### **Psychological and Social Effects of Forced Conversions on Victims and Their Families in Pakistan: A Comparative Analysis with International Human Rights Law**

The psychological and social effects of forced conversion on victims and their families in Pakistan are significant and varied.<sup>20</sup> Individuals who

undergo forced conversions frequently encounter considerable emotional challenges, such as anxiety, depression, and trauma.<sup>21</sup> The forced nature of these exchanges can lead to a profound loss of identity and belonging, as individuals are often torn apart from their cultural and religious roots.<sup>22</sup> Families of victims also face severe impacts, including social stigma, eviction, and economic hardship.<sup>23</sup> When a member of a family is forcibly converted, the entire family may be marginalized in their community, leading to a loss of social status and support.<sup>24</sup>

The trauma associated with forced conversions can interfere with family relationships, leading to divisions that impact the family's unity and functioning.<sup>25</sup> In many cases, families may feel helpless in protecting their loved ones, further exacerbating their psychological distress. The societal implications of forced conversions impact not only individual families but also foster a culture of fear and mistrust within religious minority communities.<sup>26</sup>

International human right instrument treat these cases as composite violation. Article 18 of ICCPR safeguard the freedom to have a religion of your own choice. While Article 7 prohibit inhuman and cruel treatment which surround psychological trauma inflicted through forced conversions. Also Article 23 protect the family of every individual as a fundamental unit of society. The UN Declaration on the elimination of violence against women (DEVAW) article 2(a) frames forced conversion as act of violence causing physical, sexual and psychological harm.

International covenant on the right of child article 16 protect children from unlawful interference with privacy and home, yet majority of converted girls are of age 14 to 16.

### **Gendered Dimension Of Forced Conversion In Pakistan**

The dynamics of forced conversions in Pakistan show a concerning trend, especially regarding the targeting of women and girls from religious minorities.<sup>27</sup> Social norms and gender roles play a significant role in increasing the vulnerability of these individuals, making them more susceptible to coercive tactics used by those who carry out forced conversions.<sup>28</sup> In many instances, women and girls encounter specific challenges that arise from patriarchal societal frameworks. Religious leaders may take advantage of these vulnerabilities by employing tactics that specifically target women, including abduction, emotional manipulation, or threats of violence.<sup>29</sup>

90% of reported cases of forced conversion are of girls aged 12-18. Typically, following an abduction, the victim's family requests the local police to register a First Information Report (FIR). The police often hesitate

or do not conduct a thorough investigation. Instead, after a few days, the parents frequently receive a conversion certificate along with a marriage certificate, and are informed that the girl has willingly converted to Islam, married, and is residing with her new spouse.<sup>30</sup>

The gendered aspects of forced conversions require a focused approach to understanding and addressing these issues within the larger context of minority rights in Pakistan, highlighting the need for protective measures that take into account the specific challenges encountered by women.<sup>31</sup>

### **Challenges To Human Rights Compliance**

Pakistan's commitment to human rights is significantly affected by institutional and political challenges. Human rights are often deprioritized in the context of security concerns, influenced by the intertwining of military authority and civil governance in the country's political landscape. The military's influence on policy decisions, especially regarding national security, leads to limitations on civil liberties and results in human rights abuses such as enforced disappearances and extrajudicial killings.<sup>32</sup> The court's ability to protect human rights is hindered by political pressure and corruption, despite its constitutional independence. This situation is exacerbated by political instability and frequent changes in government, which often lead to a lack of coherence and consistency in human rights programs. Additionally, a culture of impunity is perpetuated because violations often remain unpunished due to inadequate institutional mechanisms for accountability.<sup>33</sup> In Pakistan, socioeconomic challenges significantly hinder the realization of human rights. Factors such as poverty, illiteracy, and limited access to essential services like healthcare and education severely restrict individuals' ability to claim and exercise their rights. Economic inequality contributes to social stratification, placing marginalized groups—particularly minorities and women—at the forefront of institutionalized exclusion and discrimination. These issues are exacerbated by the disparity between rural and urban areas, where rural communities often lack adequate infrastructure and state support.<sup>34</sup> Attitudes and actions regarding human rights in Pakistan are significantly shaped by cultural and religious traditions. International human rights standards, especially those related to gender equality and women's rights, often conflict with traditional patriarchal views. Laws and theological interpretations, including those related to blasphemy, can serve as justifications for violence and discrimination against religious minorities. These cultural and religious influences are deeply embedded in social

attitudes and behaviors, which may hinder efforts to promote human rights.<sup>35</sup>

### **Religious Institution And Clerical Influence.**

Madrasas and religious organizations serve a dual purpose. In Pakistan, certain clerics and seminaries have faced allegations of enabling forced conversions and providing false age certificates or marriage documents. This is the frequent feature of forced conversion case that they issue a conversion certificate or affidavit by which they are declaring that the victim embraced Islam voluntarily. And those documents were accepted by police and courts with little bit inquiry. In India, religious leaders from both Hindu and Muslim communities frequently play a central role in mobilizing support for or against interfaith unions. The existing literature examines the role of religious authorities in either reinforcing or failing to address intolerance.

### **Mechanism Used For Forced Conversion.**

The significant issue surrounding these forced conversions involves various societal influences, including extremist clerics. Reports indicate that in certain instances, when individuals declined to convert to Islam willingly, they faced accusations of blasphemy and violations of Islamic laws. There have been documented cases where members of religious minorities who resisted conversion to Islam were either charged with blasphemy or threatened with such charges.<sup>36</sup> They experienced societal pressure to accept Islam if they declined the offer. Various mechanisms exist to compel minority individuals to convert without their free will. Two of the most prevalent methods are Bonded Labor and Forced Marriage. A significant portion of bonded laborers belongs to the Hindu minority, particularly from scheduled castes. They are held in servitude due to unpaid loans, with their labor considered as compensation for debts incurred. Many live under constant surveillance. There are reports of enslavement driven by religious intolerance. Victims often endure physical, mental, and sexual abuse, and are frequently employed in sectors such as farming, brick-making, tanning, and carpet production. Unfortunately, there is a lack of stringent legislation against bonded labor, and even existing laws, such as the national Bonded Labor Abolition Act of 1992, have not been effectively enforced. Reports indicate that police are often hesitant to document victims' accounts due to the political connections and influence of the perpetrators. This discrimination is further reinforced by societal factors that promote the acceptance of such practices in Pakistan.<sup>37</sup> Another significant reason for this conversion is forced marriages. The number of minor girls marrying

Muslim men and subsequently converting has risen considerably in recent years.<sup>38</sup> Other contributing factors include, but are not limited to, the maintenance of the status quo by religious institutions, discriminatory practices against non-Muslim communities, misogyny and extreme patriarchy adversely affecting women, a lack of adequate educational opportunities for minorities, and pressure from conservative local groups. Additionally, when incidents occur, political affiliations or traditional sympathies typically hinder prompt and effective responses to such crimes.<sup>39</sup>

### **Forced Conversion In The View Of Fiqh.**

The Islamic principle of religious conviction prohibits forced conversion, as reflected in the Quranic verse emphasizing "no compulsion in religion."<sup>40</sup> In Islamic law, non-Muslim minorities, referred to as "Dhimmi," are granted a status known as "protected persons." This designation applies to non-Muslims who reside in an Islamic state and are entitled to certain legal protections.

Islamic law mandates that the state ensures the safety and religious freedoms of its citizens, while also recognizing their allegiance to the state, which includes the obligation to pay the jizya tax. This is distinct from the zakat, which is the obligatory alms paid by Muslim citizens. An important aspect of this legal framework is that Dhimmis, as non-Muslims, are exempted from specific duties that apply only to Muslims, provided they fulfill their obligation to pay the jizya.

Islam grants every individual fundamental rights to life and honor, irrespective of their beliefs or creed. The Quran states that taking the life of an individual without legitimate authority is akin to killing humanity. Thus, the rights of non-Muslims are recognized as equal to those of Muslims. No Muslim is permitted to harm the lives, property, or places of worship belonging to non-Muslims. According to the Holy Prophet Muhammad, "He who tortures a Dhimmi is like one who has tortured me." On the Day of Judgment, I shall counteract against him.

Islam highlights the importance of tolerance toward minorities and their inclusion in government roles to contribute to the development of the state. Minorities have the right to practice their religion, fulfill their religious obligations, and establish educational institutions and places of worship to educate their children about their faith and beliefs.<sup>41</sup> Additionally, they are regulated by their own legal systems (Personal Laws). For example, during the Muslim rule, the Jewish community in Medina was allowed to establish its own Halakhic courts.<sup>42</sup> They are allowed to engage in certain practices that are generally prohibited for Muslims, such as consuming alcohol.<sup>43</sup>

Christians, Jews, and Sabians are recognized as Dhimmi by all four schools of Islamic jurisprudence. In contrast, Hindus and Polytheists are given Dhimmi status by only the Hanafi and Maliki schools.<sup>44</sup>

The majority of Muslim followers in Pakistan adhere to the Hanafi School of Jurisprudence, which leads commentators to classify Hindus as Dhimmi (protected minority) within the country. Islam, through the concept of Dhimmi, provides various privileges to minorities, including the freedom of religion and a prohibition on the forced conversion of these groups.

### **Conclusion.**

Despite Pakistan's ratification of international human rights treaties, these obligations have no effective and direct relevancy with domestic law. Forced conversion is not just a social problem but it is a failure of human rights protection system in Pakistan. Although, to some extent, Pakistani domestic law- like international human rights law- also include the prohibition regarding coercive conversion but the problem is in the weak and inconsistent implementation. This failure is increased by judicial practice also. Where the court instead of inquiry, just rely on a simple conversion certificate. As a result there are destructive psychological and social consequences of forced conversion on victims. Religious lobbies also believe that forced conversion is their religious duty of minority girls. Which is against international human rights law, domestic law and Islamic law.

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### **References**

- 1 Matthews, J.R., 1995. Major Greenwood versus Almroth Wright: contrasting visions of "scientific" medicine in Edwardian Britain. *Bulletin of the History of Medicine*, 69(1), pp.30-43.
- 2 Batool, M., Tehseem, T., & Shah, A. A. (2022). Exploring identity crises in Nadeem Aslam's maps for lost lovers: A conversation analysis. *Competitive Social Science Research Journal*, 3(1), 276-292.
- 3 Hussain, G. (2021). Religious conversions in Pakistan: Empirical evidence from Sindh. *Policy Perspectives*, 18(1), 5-24.
- 4 Afzal, N., Hameed, A., & Jabeen, I. (2022). The use of macro and micro structures in Pakistani prime minister's speech at UNGA: A critical discourse analysis approach. *Croatian International Relations Review*, 28(89), 39-61.
- 5 Caron, J., & Khan, S. (2022). Writing war, and the politics of poetic conversation. *Critical Asian Studies*, 54(2), 149-170.
- 6 Article 20, constitution of Pakistan 1973
- 7 Khalid, A. (2022). The negotiations of Pakistani mothers' agency with structure: Towards a research practice of hearing 'silences' as a strategy. *Gender and Education*, 34(6), 659-673.

- 8 Patimah, E., Nurhantoro, T. S., & Susanti, D. L. (2021). Rethinking gender discrimination: The restriction of Pakistan women's rights through cultural and political interests as portrayed in Aisha Saeed's *Amal unbound*. *Journal of English Language and Language Teaching*, 5(1), 63-74.
- 9 Article 12 & 14 of CRC
- 10 Kayaoglu, T. (2020, September 28). The Organization of Islamic cooperation's declaration on human rights: Promises and pitfalls. *Brookings*.
- 11 Kretzmer, D. and Klein, E. eds., 2021. The concept of human dignity in human rights discourse. *Brill*.
- 12 Ife, J., Soldatić, K. and Briskman, L., 2022. *Human rights and social work*. Cambridge University Press.
- 13 *Shehla Zia v. WAPDA (PLD 1994 SC 693)*
- 14 ICCPR, art 18
- 15 Vienna Convention on the Law of Treaties, May 23, 1969, art. 26.
- 16 International Dalit Solidarity Network, *Caste-Blind Does Not Mean Casteless: Discrimination against Dalits in Pakistan*, 2020
- 17 *ibid*
- 18 <sup>8</sup> UN Human Rights Committee, Concluding Observations on the Second Periodic Report of Pakistan, CCPR/C/PAK/CO/2, 38 (2024)
- 19 PAK CPIN- Pakistan and christian converts, april 2024, p 11.4.8
- 20 • Aksakalova, O., & Chatterji, T. (2023). Combating isolationism through coil virtual exchange. In *Writing on the wall: Writing Education and Resistance to Isolationism*, 151. University Press of Colorado. 9781646423248
- 21 Shah, W. A., Pardesi, H. Y., & Memon, T. (2024). Neoliberalizing subjects through global ELT programs. *TESOL Quarterly*, 58(2), 693-725.
- 22 Akram, U. (2024). *Exploring market entry strategies for Pakistani exports in Germany (Doctoral dissertation)*. Technical University Ingolstadt of Applied Sciences.
- 23 Batool, M., Tehseem, T., & Shah, A. A. (2022). Exploring identity crises in Nadeem Aslam's maps for lost lovers: A conversation analysis. *Competitive Social Science Research Journal*, 3(1), 276-292.
- 24 Hussain, G. (2021). Religious conversions in Pakistan: Empirical evidence from Sindh. *Policy Perspectives*, 18(1), 5-24.
- 25 Caron, J., & Khan, S. (2022). Writing war, and the politics of poetic conversation. *Critical Asian Studies*, 54(2), 149-170
- 26 Waheed, S. F. (2022). *Hidden Histories of Pakistan*. Cambridge University Press
- 27 Vandamme, D. (2022). *Role compatibility as socialization: The case of Pakistan*. Routledge.
- 28 Zhang, H. (2021). *Internationalization of China's developmental state: Mechanisms and impacts (Doctoral dissertation)*. George Mason University
- 29 Manan, S. A., Channa, L. A., & Haidar, S. (2022). Celebratory or guilty multilingualism? English medium instruction challenges, pedagogical choices, and teacher agency in Pakistan. *Teaching in Higher Education*, 27(4), 530-545
- 30 APPG for Pakistani Minorities, Westminster Report, Dec 2021

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- 31 Baqai, H. N. S. (2022). A rearticulation of Pakistan's foreign policy in the wake of the twenty-first century challenges. *Global Pakistan: Pakistan's Role in the International System*, 171-194.
- 32 Rahman, M., Ahmed, R., Moitra, M., Damschroder, L., Brownson, R., Chorpita, B., Idele, P., Gohar, F., Huang, K.Y., Saxena, S. and Lai, J., 2021. Mental distress and human rights violations during COVID-19: a rapid review of the evidence informing rights, mental health needs, and public policy around vulnerable populations. *Frontiers in psychiatry*, 11, p.603875
- 33 Tomaševski, K., 2021. Responding to human rights violations, 1946-1999 (Vol. 63). Brill.
- 34 Akhmedshina, F., 2020. Violence against women: a form of discrimination and human rights violations. *Mental Enlightenment Scientific-Methodological Journal*, pp.13-23.
- 35 Costello, C. and Mann, I., 2020. Border justice: migration and accountability for human rights violations. *German Law Journal*, 21(3), pp.311-334
- 36 Compass Direct News 12 Mar. 2012; The Express Tribune 9 Oct. 2012
- 37 Malik, N. (2016). Bonded Labour in Pakistan. *Advances in Anthropology*, 6, p. 127-136.
- 38 Aftab, S; Taj, A (2015). Migration of Minorities in Pakistan: A Case Study Analysis. AWAAZ Programme.
- 39 Movement for Solidarity and Peace (2014). Forced Marriages & Forced Conversions In the Christian Community of Pakistan, p. 23
- 40 Quran 2:256
- 41 Parveen ShokatAli,, 'Human Rights in Islam'. New Delhi: Adam Publishers, 2007.
- 42 Cohen, Mark R. 'Under Crescent and Cross: The Jews in the Middle Ages'. Princeton University Press. P. 74. ISBN 978-0-691-01082-3. (2005) Retrieved 10th April 2022
- 43 Al-Misri, Reliance of the Traveler' (edited and translated by Nuh Ha Mim Keller), p. 608. Amana Publications, 1994.
- 44 Gerhard Bowering, ed. (2009). *Islamic Political Thought: An Introduction*. Princeton University Press. Pp. 127–128. ISBN 9781400866427.