

# UNIVERSAL PERIODIC REVIEW (UPR) STAKEHOLDER SUBMISSIONS

## MINORITY RIGHTS GROUP INTERNATIONAL

in partnership with :

Bytes for All, Catholic Commission for Justice and Peace, Center for Law and Justice and  
Bargad Youth Organization

Submission in the framework of the Universal Periodic Review of

## PAKISTAN

42<sup>nd</sup> Session of the Working Group on the UPR

23 January – 3 February 2023

minority  
rights  
group  
international

Minority Rights Group (MRG)

Web: [www.minorityrights.org](http://www.minorityrights.org)

54 Commercial Street, London E1 6LT United Kingdom



[www.bytesforall.pk](http://www.bytesforall.pk)

Bytes for all

Web : [www.bytesforall.pk](http://www.bytesforall.pk)

11-12 Salam Heights, 3rd Floor, Sector E- 11/2-3, SCHS, Islamabad - Pakistan



Catholic Commission for Justice and Peace (CCJP)

Web: <http://ccjp-pk.org>

E64/A, Street No. 8, Officer's Colony, Walton Road Lahore Cantt. - Pakistan



Bargad Youth Organization

17/18, Block N, Giulberg II, Lahore - Pakistan



Center for Law & Justice

Dignity | Diversity | Diligence

Center for Law and Justice (CLJ)

Web: <https://cli.org.pk>

Plot 311, Block L Model Town, Lahore, Punjab 54700 - Pakistan

## **I. Introduction:**

1. This joint submission to the Working Group on the Universal Periodic Review (UPR) ahead of review of Pakistan at the 42nd session is based on information gathered by Minority Rights Group International, in partnership with Bytes for All, Catholic (National) Commission for Justice and Peace, Center for Law and Justice and Bargad Youth Organization. It focusses on the rights of religious minorities in the country, including their right to freedom of religion or belief.
2. As per Articles 20, 22 and 25 of its Constitution<sup>1</sup> and international human rights law, including Articles 18 and 26 of the International Covenant on Civil and Political Rights (ICCPR), Pakistan is bound to ensure that; i) all individuals are equal before the law and are equally protected by the law, ii) All legal and administrative hurdles that violate the right to freedom of religion or belief are removed; ii) the legal framework, public policies, and practices of the state must respect, fulfill and protect the full and equal enjoyment of freedom of religion or belief for all in Pakistan.
3. Persons belonging to religious minorities in Pakistan face discrimination in their daily lives, which impacts their enjoyment of basic and fundamental rights – including but not limited to their right to freedom of religion or belief (FoRB). At the same time, this leads to socio-political and economic exclusion, leading to a situation in which minorities are severely marginalized in all aspects of life. As per the latest (2017) Census, Muslims make up 96.47% of the population (including Shi'a Muslims). Ahmaddiya constitutes 0,09% of the population, and non-Muslim religious minorities constitute 3.53%, including: Hindus 1.73%; Christians, 1.27%; and others, 0.02%.<sup>2</sup> The census data also captures 0.41% of the population as scheduled castes which is a mixed group, some belonging to religious minority, some not.
4. In March 2018, the UN Human Rights Council adopted the outcome report of Pakistan's third Universal Periodic Review (UPR). The Pakistani government accepted 168 out of the 289 recommendations it received from the UN member states, while 121 recommendations were 'noted'. Several of these recommendations, which include those both accepted and not, called for an end to all forms of discrimination against minorities. Recommendations 81, 83, 84, 87, 148, 149, 153, 154, 158, 162, 165, 168, 169,166, 224, 273 and 225 in particular call to

secure the rights of vulnerable groups and persons, including religious minorities (right to education without discrimination, protection of the freedom of religion or belief of religious minorities, equality and non-discrimination). This submission includes official data and data gathered by national and international organizations and from credible media reports.

## **II. Legal framework for Freedom of Religion and Belief**

5. It is Pakistan's legal obligation to ensure non-discrimination and equality among its citizens under the Constitution of Pakistan and International Human Rights Law. Articles 20 and 25 of the Constitution of Pakistan, guarantee freedom of religion and equality before the law, respectively. Likewise, these legal obligations are enshrined in international human rights treaties to which Pakistan is a state party, and in particular under Article 2, Article 26, and Article 27 of the ICCPR, Article 2 of the International Covenant on Economic Social and Cultural Rights (ICESCR) and the International Convention on the Elimination of all forms of Racial Discrimination call upon the state parties to end discrimination on many grounds and to ensure equality before the law and the equal protection of the law for all.
6. In view of this framework Pakistan needs to take comprehensive measures and initiatives at legislative, policy and administrative levels to comply with its national and international obligations to respect, protect and fulfill human rights, including the rights of religious minorities.

## **III. Right to Freedom of Religion or Belief**

### **Online Hate Speech**

7. Minority Rights Group (MRG) along with its Pakistan-based partner and co-sponsor of this submission, Bytes for All, have monitored and documented the trends of online faith-based hate speech between 2019 and 2022. This includes the widespread targeting of religious minorities by individuals belonging to the majority religion.<sup>3</sup> During this period, Pakistan has witnessed a significant rise in hate speech, especially in the online spaces against religious

minorities, in particularly targeting Shi'a, Ahmadis, Hindus, and Christians. In some instances, this has been followed by hate crimes.

8. According to this research by MRG and Bytes For All, Ahmadis are the most consistent target of hate speech online, contributing to several offline incidents, including killing of individuals belonging to the Ahmadiyya faith. Blasphemy cases have been registered against Ahmadis for using (online and offline) religious phrases and words used by Muslims. These cases are enabled by Sections 298 - B and 298-C of the Penal Code of Pakistan (PPC), which impose restrictions on Ahmadis ability to propagate their faith. Online hate speech against Ahmadis contributes to an ongoing hostile context, characterized by violence and discrimination. At least 13 Ahmadis were killed between January 2017 to July 2022, with 40 wounded in the same period in hate crime incidents.<sup>4</sup> Other hate crimes against Ahmadis include desecration and demolishing of their graves in Hafizabad<sup>5</sup> and Khushab<sup>6</sup> in 2022 and in Sheikhpura<sup>7</sup> in 2021. At least three incidents of demolishing of Ahmadi Mosques were also reported during the reporting period: one in Sialkot in 2018<sup>8</sup>; one in Gujranwala in 2019<sup>9</sup>; and one in Garmola Varkan in 2021<sup>10</sup>.
9. Online hate speech against Ahmadis has also been spread by state officials, escalating its reach. On April 29<sup>th</sup> 2020, the Minister of State for Parliamentary Affairs Ali Muhammad Khan, on a national TV and through his social media accounts actively spread hate and incitement to violence against Ahmadis. On his social media message he posted a slogan “Gustakh-e-Rasool Ki Saza, Sar Tan Se Juda” [Translation: Blasphemers’ deserve to be beheaded].<sup>11</sup>
10. Similarly, the hate crimes, blasphemy accusations and online hate speech against Shi'a Muslims have also been rampant<sup>12</sup>. At least 42 blasphemy cases against Shi'a individuals, mostly against leading Shi'a scholars were registered in 2020<sup>13</sup>. This series of accusations followed an alleged sermon delivered in Islamabad by Allama Asif Alvi, a prominent Shia Muslim Scholar, during the religious holiday of Ashura. A video of the sermon went viral on YouTube, Facebook and Twitter, which people claimed was edited and shared out of its context. The video prompted country-wide rallies against Shia. One anti-Shi'a rally attacked a Shi'a Imambargah (place of worship) in Karachi. Anti-Shia slogan “Shia Kafir” [Translation: Shia infidel]<sup>14</sup> is a very common occurrence on social media in Pakistan.

11. Violence against Hazara Shia in Pakistan is a longstanding issue that has continued unabated. It has remained largely unaddressed, with a general state failure to prevent, punish and remedy hate speech and hate crimes against Hazara Shia. Among other reported incidents, in 2018, a series of targeted killings were reported in Quetta, and at least three Hazara Shia have been murdered in April 2022 alone<sup>15</sup>. In January 2021 in Balochistan, 11 Hazara coalminers were gunned down. The ISIL (ISIS) group later claimed responsibility for the attack.<sup>16</sup>
12. Hindus and Christians are also victims of similar hate speech and hate crimes in online and offline spaces. Most often, these are related to blasphemy allegations. These allegations have frequently resulted in escalating hate speech, and violence. Forced conversions and forced/ underage marriages of girls belonging to religious minorities (under the guise of conversion), primarily from Hindu and Christian Communities, also remains a long-standing issue<sup>17</sup>. Pakistan has not succeeded in achieving implementation of a minimum age of marriage; where this exists it is alleged that it can be flouted<sup>1</sup>. This impacts particularly on religious minority girls where the issue of religious conversion interacts with underage marriages. The Christian Marriage Act which dates from the colonial era, still provides for a minimum age of marriage of 14 for boys and 13 for girls. At the time of writing, we note that the Government of Pakistan has not submitted its state report concerning its progress in implementing the Convention on the Rights of the Child. This delay is unhelpful in reviewing and making progress on child marriages including those involving coercion, grooming and conversion of minority under-age girls.

### **Misuse of Blasphemy Laws and (offline) hate speech**

13. Pakistan's blasphemy laws include: Sections 295-B, 295-C dealing with offenses of desecration of the Holy Quran and insult against Prophet Muhammad respectively; Section 298 dealing with insult against companions, family members, caliphs and wives of Prophet Muhammad. Sections 298-B and 298-C directly place specific restrictions on Ahmadis for propagating their faith. These laws were inserted in the Pakistan Penal Code during 1980 and 1986 under the then dictatorial regime and have not been removed from since then.

---

<sup>1</sup> ibid

14. On December 3, 2021, Priyantha Kumara, a Sri Lankan working in Sialkot (Pakistan) was lynched and killed by a mob over an allegation of blasphemy<sup>18</sup>. Two months later, the same tragedy of accusation of blasphemy, lynching to death was repeated with the victim being a mentally unstable man<sup>19</sup>.
15. Although the Prime Minister has issued statements condemning this phenomenon in the case of Priyantha Kumara,<sup>20</sup> state authorities have not taken any initiative to repeal or amend blasphemy laws 295 A, 295 B & 295 C<sup>21</sup>. This reflects a wider tendency of the state to not adequately address issues concerning blasphemy legislation. According to a report by the of the National Commission for Justice and Peace, Pakistan records more than 50 cases of blasphemy allegations every year<sup>22</sup>. There were 56 cases reported in 2019, 113 in 2020, and 54 in 2021. There has been a total of 620 cases reported since 2012. These allegations target primarily persons belonging to the religious minority communities (including those from the Shi'a and Ahmadi sectarian communities). Ultimately, the reluctance of the state to amend or repeal blasphemy laws, despite its wrongful use to stimulate or excuse extra-judicial killings or violence, has resulted in the widespread misuse of blasphemy laws.
16. Following a Supreme Court Judgement in 2014, a set of measures to enhance the protection of minorities was mandated<sup>23</sup>. The Government of Pakistan has continued to fail to implement those measures in a meaningful way as mandated by the Court (dates from previous UPR period but continuing issue).

### **Hate Material in Textbooks**

17. Religious hatred expressed against religious minorities is evident in textbooks. This includes the use of derogatory wording, depicting persons belonging to religious minorities as “cunning” and “infidels”.<sup>24</sup> Religious hate material in textbooks which presents religious minorities as second-grade citizens has helped to create a religiously polarized generation. As the National Commission for Justice and Peace has reported, religious hatred expressed against religious minorities has allegedly contributed to an increased drop-out rate among students belonging to religious minorities who face discrimination and alienation.<sup>25</sup>
18. As steps are made to introduce a Single National Curriculum (SNC), it is expected that the intensity of religious hatred is set to rise<sup>26</sup>. In the proposed curriculum, Islamic Studies is

infused in other subjects and there is no separate curriculum for religious minorities<sup>27</sup>. In a positive development, members of religious minorities have been included in the External Review Committee for the textbooks. However, they need to take more robust actions to undo the damage and rewrite and rework school material in a way that is not discriminatory towards persons belonging to religious minorities.<sup>28</sup>

#### **IV. Job Quota for Religious Minorities:**

19. The Government of Pakistan has reserved a minimum of 5% percent of government jobs for minorities since a quota was introduced in 2009. An important aspect of this quota system is that if suitable candidates are not immediately available, posts are left vacant until a suitable person is found.
20. Historically, in periods covered by previous UPRs it was clear that despite introducing an affirmative action scheme, it was clear that the minority job quota was not effective mainly because there were not many qualified candidates who could enter into Gazetted positions in the government jobs.<sup>29</sup> Studies of the federally employed officials established that the number of minority employees is yet below actual proportion of persons belonging to religious minorities within the population. Pakistani civil society activists highlighted the need for a matching education quota for creating level paying fields for members of the religious minorities. After much lobbying by the rights and faith-based organizations, the government of the Punjab province on April 30, 2019 approved a 2-percent quota in higher education institutions for students belonging to religious minorities under its Punjab Minorities Empowerment Package.<sup>30</sup> This quota, however, does not apply to medical universities and only allows Ahmadi to contest on non-Muslim reserved seats.
21. A similar quota system was approved by the Khyber Pakhtunkhawa government in May 2021, with the exception of medical and engineering universities. However, in December 2021, the quota coverage was applied on some academic programmes related to nursing staff in constituent colleges of medical universities in the province.<sup>31</sup>

22. The quotas on education have not been met with full compliance. Initially there was reluctance on the part of the university administrations, but now it is advertised on a regular basis. A data set collected by MRG's partner Bargad of 30 public universities in Punjab informs that there has been enrolment made on minority education quota but its progress is gradual, partly due to the aforementioned reluctance and partner due to the fact that the scheme has been inadequately publicized meaning that not all prospective candidates and parents are fully aware of how to use this opportunity.<sup>32</sup>
23. The job quota policy measure has a weak legal basis because it rests on administrative orders (notifications) rather than legislation, which results in practical difficulties. A lack of regulatory, referral, monitoring and remedy procedures/ mechanisms hampers positive results in this regard.

## **V. Sanitation workers:**

24. Sanitation workers in Pakistan face challenging and hazardous working conditions and are afforded minimal compensation. This work tends to be reserved for non-Muslims/ religious minorities in Pakistan, reflecting a longer legacy in the Indian subcontinent where sanitation work has been reserved to those considered "inferior" and "low-born", reflecting a caste-based division of labor. Despite the fact that Muslims are 96.47% of the total population of Pakistan almost 90% work force of the sanitation workers belong to the Christian and Hindu communities, which are 1.27% and 1.73% respectively of the total population<sup>33</sup>. These sanitation workers tend to come from Dalit backgrounds.
25. A study on sanitation workers<sup>34</sup>, conducted by the Center for Law and Justice (CLJ), shows that an overwhelming number of sanitation workers consists of Christians, mostly from Dalit backgrounds. After them, Hindus are in high number in sanitation work who also come from Dalit origins. Even though many Muslims are in this occupation, they are mostly of Dalit descent. The study, first published in 2019, found that Lahore Waste Management Company (LWMC) had 9000 workers, all of whom were Christian.<sup>35</sup>



26. Earlier in 2018, similar data collected by World Watch Monitor in Pakistan showed that Christians formed an overwhelming number of the sanitation workforce.<sup>36</sup>
27. Several advertisements issued by government departments published in newspapers described jobs for sanitation workers/ sweepers as being reserved for minorities<sup>37</sup>, showing that public authorities have paid little attention to removing discrimination in jobs besides the 0.5 quota referred to above.
28. The Center for Law and Justice reported that from February 2010 to October 2022 around 300 discriminatory job advertisements were published, citing jobs for the sanitation workers reserved for religious minorities<sup>38</sup>. It is unlawful to discriminate in this way, outside of affirmative action; and reserving the lowest status, lowest paid jobs for a religious minority can never form part of an affirmative action programme.
29. The 2019 CLJ study cited above finds that because the workers are not provided safety equipment and there are no safety protocols, the workers come in contact with hazardous chemicals, excreta, sewage, and rotten trash daily. Those who work in sewers are not provided with drysuits, headlamps, oxygen cylinders and masks, gas detectors, and steel ladders—workers dead with solid waste and sewage with bare hands and bare bodies. In many cases, they dive deep into manholes filled with putrefied sewage. Most workers suffer from tuberculosis, asthma, and hepatitis because of the lack of safety equipment.
30. These workers receive very little payment for this important and hazardous work. In many instances, their wages are even less than the minimum wage set by the state. Most of these workers are not hired on a regular contract. The workers are forced into unhygienic and life-threatening work by keeping the threat of being employed live all the time. Many of them are hired on an 89 days contract in government departments, so they are not regularized and made permanent employees. So, the employees sign a new contract at the end of the 89-day contract. This way, the workers are retained for years with no job security.<sup>39</sup>

**In light of the above, co-submitting organisations urge States to recommend to**

**Pakistan to:**

1. Review and modify Sections 295 and 298 of the Pakistan Penal Code (blasphemy laws) to bring them in line with Art.18 and Art.19 of ICCPR
2. Take strong measures, including through public campaigns, public discourse at all levels and education, to prevent and address regular accusations of blasphemy that can lead to violence.
3. Train and equip law enforcement personnel to monitor social media for spikes of hate speech that have the potential to result in criminal acts and increase rapid response capacity to prevent hate crimes.
4. Repeal laws that discriminate against minorities including section 298 of the Penal Code of Pakistan
5. Submit its overdue periodic report to the Committee on the Rights of the Child
6. Pass clear legislation to establish the legal minimum age of marriage as 18 years of age and take steps to ensure that this is respected by all parties with additional safeguards in place considering the additional vulnerability of religious minority girls to underage marriage.
7. Federal and Provincial Authorities must implement recommendations made by Supreme Court in 2014 on the rights of religious minorities,
8. Ensure a curriculum and school material free from discrimination against religious minorities, which respects, values and welcomes the contribution to society of those of all faiths and none.
9. Ensure training of teachers is enhanced to ensure all educators respect and promote values of diversity and inclusiveness as well as tackle intolerance, negative stereotypes and discrimination in the curriculum and in academic achievement.
10. Establish a comprehensive administrative framework at state level to monitor transparently the implementation of job and education quotas for religious minorities and address barriers to full implementation
11. Abolish the clause in service rules/recruitment policies of all federal and provincial government departments that specifies the criterion of religious minorities to be hired for the sanitation work. Clearly direct all government entities and sub-contractors to cease placing such discriminatory adverts and take disciplinary action or sanctions against any that continue to do so.

12. Ensure that all sanitation workers who regularly provide service should be regularized, provided with job security, health and safety related equipment, medical care and ensure that their salaries are paid at least at minimum wage. Take action against any company or government entity that does not comply.

<sup>1</sup> [https://na.gov.pk/uploads/documents/1333523681\\_951.pdf](https://na.gov.pk/uploads/documents/1333523681_951.pdf) Article 20 (Freedom to profess religion and to manage religious institutions), Article 22 (safeguards as to educational institutions in respect of religion) and Article 25 (Equality of Citizens).

<sup>2</sup> [https://www.pbs.gov.pk/sites/default/files/population/2017/sailent\\_feature\\_census\\_2017.pdf](https://www.pbs.gov.pk/sites/default/files/population/2017/sailent_feature_census_2017.pdf)

<sup>3</sup> <https://ohs2020.idontforwardhate.net/>

<sup>4</sup> <https://www.aljazeera.com/news/2021/7/26/ahmadi-persecution-pakistan-blasphemy-islam>

<sup>5</sup> <https://thediplomat.com/2022/02/pakistan-continues-to-exhibit-gory-islamophobia-against-ahmadis/>

<sup>6</sup> <https://www.rabwah.net/ahmadi-graves-desecrated-pakistan/>

<sup>7</sup> *Ibid.*

<sup>8</sup> <https://www.reuters.com/article/us-pakistan-ahmadis-idUSKCN1IP20H>

<sup>9</sup> [https://www.voanews.com/a/south-central-asia\\_pakistani-police-demolish-mosque-minority-ahmadi-sect/6178363.html](https://www.voanews.com/a/south-central-asia_pakistani-police-demolish-mosque-minority-ahmadi-sect/6178363.html)

<sup>10</sup> <https://nayadaur.tv/2021/03/ahmadi-worship-place-desecrated-in-gujranwala-attackers-celebrate/>

<sup>11</sup> <https://nayadaur.tv/2020/04/minister-ali-muhammad-khan-says-blasphemers-should-be-beheaded/>

<sup>12</sup> [https://www.voanews.com/a/extremism-watch\\_blasphemy-cases-against-shiite-community-surge-pakistan/6197713.html](https://www.voanews.com/a/extremism-watch_blasphemy-cases-against-shiite-community-surge-pakistan/6197713.html)

<sup>13</sup> <https://www.ucanews.com/news/shia-muslims-feel-the-heat-of-pakistans-blasphemy-laws/90509>

<sup>14</sup> <https://ohs2020.idontforwardhate.net/>

<sup>15</sup> <https://www.dawn.com/news/1404396>

<sup>16</sup> <https://www.aljazeera.com/news/2021/1/3/gunmen-kill-at-least-11-from-shia-minority-in-south-west-pakistan>

<sup>17</sup> <https://www.ids.ac.uk/publications/violence-and-discrimination-against-women-of-religious-minority-backgrounds-in-pakistan/>

<sup>18</sup> <https://www.dawn.com/news/1661878/ghastly-murder-of-lankan-man-in-sialkot-shames-nation>

<sup>19</sup> <https://www.thefridaytimes.com/2022/02/13/man-tortured-to-death-by-mob-on-blasphemy-allegations-in-mian-channu/>

<sup>20</sup> <https://tribune.com.pk/story/2332852/wont-let-incidents-like-sialkot-happen-again-pm>

<sup>21</sup> <https://www.thefridaytimes.com/2021/09/03/how-misuse-of-blasphemy-laws-takes-innocent-lives-in-pakistan/>

<sup>22</sup> Annual Human Rights Monitor of NCJP <https://drive.google.com/file/d/1KFB4pNfzDsGLP9dGKq8utUEIYwDonac/view?usp=sharing>

<sup>23</sup> <https://www.refworld.org/pdfid/559e57644.pdf>

<sup>24</sup> [https://drive.google.com/file/d/1MP\\_JmB8ZTRHohvAQajuypbYR9MhZo9zM/view?usp=sharing](https://drive.google.com/file/d/1MP_JmB8ZTRHohvAQajuypbYR9MhZo9zM/view?usp=sharing) (On the Same Page? NCJP's evidence-based research study)

<https://www.dawn.com/news/844641/curriculum-of-hatred>

<sup>25</sup> [https://drive.google.com/file/d/1MP\\_JmB8ZTRHohvAQajuypbYR9MhZo9zM/view?usp=sharing](https://drive.google.com/file/d/1MP_JmB8ZTRHohvAQajuypbYR9MhZo9zM/view?usp=sharing) (On the Same Page? NCJP's evidence-based research study)

<sup>26</sup> <https://www.dawn.com/news/1572130>

<sup>27</sup> <https://www.dawn.com/news/1630230>

<sup>28</sup> <https://www.dawn.com/news/1630231>

<sup>29</sup> *Ibid.*

<sup>30</sup> Daily Dawn. '2pc seats for minority students in higher education', Karachi: May 1, 2020. Available at:

<https://www.dawn.com/news/1553584>

<sup>31</sup> Daily The News International. 'KP reserves minority quota in medical education,' By Kasim Abbasi, November 25, 2021. Available at:

<https://www.thenews.com.pk/print/911527-kp-reserves-minority-quota-in-medical-education>

<sup>32</sup> 'Progress Report: 1st Vice-Chancellors' Conference on Equity and Inclusion of Marginalized Communities in Higher Education: Opportunities and Challenges, 2021,' PPT Presentation made at 2nd VCs' Conference, 'The Challenges of Academic Governance, Achieving Excellence and Equity in Higher Education', Jointly organized by University of Home Economics, Lahore and Bargad: Lahore, 30 June, 2022.

<sup>33</sup> [https://www.pbs.gov.pk/sites/default/files/population/2017/sailent\\_feature\\_census\\_2017.pdf](https://www.pbs.gov.pk/sites/default/files/population/2017/sailent_feature_census_2017.pdf)

<sup>34</sup> <https://cli.org.pk/wp-content/uploads/2022/05/Shame-and-Stigma-in-Sanitation-New-Edition-2021.pdf>

<sup>35</sup> <https://cli.org.pk/wp-content/uploads/2022/05/Shame-and-Stigma-in-Sanitation-New-Edition-2021.pdf>

<sup>36</sup> <https://www.worldwatchmonitor.org/2018/11/untouchable-caste-identity-haunts-pakistani-christians-like-asia-bibi/>

<sup>37</sup> <https://www.facebook.com/sewperheroes/posts/pfbid03ZPw2XrfUq6y4j5DTfNAS6V8dsjix2x7LTx5TViGWMtC7F7qCnjqpvR2GXn1cDpVl>

<sup>38</sup> <https://www.nchr.gov.pk/wp-content/uploads/2022/05/Minority-Report-compressed.pdf>

<sup>39</sup> <https://cli.org.pk/wp-content/uploads/2022/05/Shame-and-Stigma-in-Sanitation-New-Edition-2021.pdf>