



Conversion without consent

The abduction, forced religious conversions, and child marriage of faith minority girls in Pakistan

Jubilee Campaign¹ and Voice for Justice²

Abstract

International human rights law guarantees individuals the right to freedom of religion or belief via “worship, observance, practice and teaching” (United Nations General Assembly 1966). Freedom of religion permits peaceful evangelism; it does not, however, protect acts of coercive conversion through bribery, promises of social benefits, or exploitation of another’s “inexperience, trust, need, low intellect or naïvety” (Council of Europe 1998). In the predominantly Muslim population in Pakistan, conversion to Islam is encouraged, and the negligible implementation of legislation – albeit already deficient or discriminatory in essence – further emboldens Muslim men to kidnap girls from minority faith communities, whom they then subject to forced religious conversions and child marriages.

Keywords

Human rights, forced conversion, faith minorities, underage marriage, Islamic jurisprudence, judicial corruption.

1. International legal framework safeguarding human rights, child rights, and the right to freedom of religion

The International Covenant on Civil and Political Rights is a foundational global agreement that outlines fundamental human rights and liberties, such as the right to liberty and security of person; the right to freedom of thought, conscience, and religion, including the freedom to identify – or not identify – with

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- 1 Jubilee Campaign USA is a non-governmental organization, based in Fairfax, Virginia, USA, that focuses on promoting the rights of religious and ethnic minorities and raising the status of vulnerable women and children, to protect them from bodily harm and exploitation. This article uses American English. Article submitted: 15 August 2023; accepted: 20 August 2024. Email: information@jubileecampaign.org.
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any belief and convert beliefs willfully; and the right to freedom of movement and residence. The Covenant additionally stipulates that the following acts are prohibited due to their incompatibility with the aforementioned fundamental human rights and freedoms guaranteed therein: “unlawful interference with ... privacy, family, home or correspondents” and “unlawful attacks on ... honour and reputation”; degrading treatment, torture, and compulsory labor; “coercion which would impair [one’s] freedom to have or to adopt a religion or belief of his choice”; the marriage of underaged individuals or any who have not acquired “marriageable age”; and nonconsensual marriages (UNGA 1966).

Pakistan ratified the International Covenant on Civil and Political Rights on 23 June 2010, though only after entering reservations to eight of the 27 articles, most notably those that protect the rights to life, freedom of religion, and freedom of opinion and expression. The Vienna Convention on the Law of Treaties (Article 19), however, allows reservations only if they do not compromise or contradict “the object and purpose of the treaty” (United Nations 1969). The Human Rights Committee has further clarified that “provisions in the Covenant that represent customary international law ... may not be the subject of reservations”, and that “a State may not reserve the right to ... [among other actions] deny freedom of thought, conscience and religion” (United Nations Human Rights Committee 1994). Pakistan’s reservations to Covenant Articles 3, 6, 7, 12, 13, 18, 19, 25, and 40 – which collectively cover the rights to freedom from arbitrary deprivation of life and torturous treatment, and freedom of travel, opinion, and faith identification or non-identification – as well as the nation’s rejection of the Covenant’s Optional Protocol on complaints procedures effectively imply disingenuous intentions behind Pakistan’s accession to the treaty (Amnesty International and International Commission of Jurists 2011).

Of particular concern are widely formulated reservations which essentially render ineffective all Covenant rights which would require any change in national law to ensure compliance with Covenant obligations. No real international rights or obligations have thus been accepted. And when there is an absence of provisions to ensure that [violations of] Covenant rights may be sued on in domestic courts, and, further, a failure to allow individual complaints to be brought to the Committee under the first Optional Protocol, all the essential elements of the Covenant guarantees have been removed (United Nations Human Rights Committee 1994).

Pakistan has similarly ratified – but rejected the Optional Protocol permitting complaints related to – the Convention on the Rights of the Child, which eluci-

dates both the rights and freedoms of children, as well as protective measures to which children are accorded due to their vulnerable status as minors. Notably, Pakistan initially ratified the treaty in 1990 with a reservation that “provisions of the convention shall be interpreted in the light of the principles of Islamic laws and values,” many of which problematically permit certain kinds of conduct that violate international standards of child rights, such as child marriage, which is authorized by Sharia. Pakistan did withdraw this reservation seven years later, in 1997, via a communication with the United Nations Secretary-General (United Nations Treaty Collection n.d.). Recognizing its identification of a “child” as an individual under 18 years of age, the Convention requires signatory nations to protect children from “all forms of discrimination or punishment on the basis of the status, activities, expressed opinions, or beliefs of the child’s parents, legal guardians, or family members” (UNGA 1989). Article 14 of the Convention mandates States Parties to “respect the right of the child to freedom of thought, conscience and religion”, and specifically to respect the will of the child’s parents to raise children according to their own faith “in a manner consistent with the evolving capacities of the child” (UNGA 1989).

As this article illustrates, Pakistani state authorities have often reneged on this commitment to guarantee children’s right to freedom of religion or belief by failing to rescue girls of minority faiths from captivity, accompanied by forced renunciation of their beliefs and coercive conversion to other beliefs. Article 19 obligates state signatories to make multidisciplinary efforts to “protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child” (UNGA 1989). In many cases, as discussed below, girls of minority faiths have been subjected to a host of physical, mental, and sexual abuses while in the custody of their kidnappers, many of whom exploit legal loopholes, along with state actors’ inaction and complicity, to maintain custody of their victims. State actors’ delay and often failure to exercise their due diligence in rescuing abducted girls is an egregious dereliction of their responsibilities, as laid out in Article 39 of the Convention, to “promote physical and psychological recovery and social reintegration of a child victim of ... any form of neglect, exploitation, or abuse” (UNGA 1989).

2. Quantitative findings

Voice for Justice and Jubilee Campaign have conducted research on cases involving abduction, forced faith conversion, and forced marriage of girls and women belonging to the Christian minority community across Pakistan between January

2019 and October 2022. With the help of lawyers, journalists, non-governmental advocacy organizations, and activists engaged locally, as well as through analysis of court documentation and other primary sources, we were able to identify patterns and contributing factors in abduction, marriage, and conversion cases. Additionally, our research exposes how the already minimal and ineffective legislative framework protecting vulnerable child communities in Pakistan loses efficacy even further due to state actors' lack of political will and complicity.

We examined 100 cases between January 2019 and October 2022 and observed that the vast majority (86 percent) occurred in the province of Punjab; within this region, the cities of Lahore and Faisalabad saw the most cases of abductions, forced conversions, and child marriages (21 cases each), followed by Gujranwala (10), Karachi (8), and Sheikhupura (7). These findings are consistent with the following section's qualitative analysis of specific publicized cases, many of which took place in these same Punjabi cities, in addition to Bahawalpur and Rawalpindi. Many of the remaining cases (11 percent of the total) occurred in Sindh province, and the remaining 3 percent took place in the provinces of Khyber Pakhtunkhwa and Islamabad. With regard to the ages of the female victims, the vast majority (61 percent) were under age 16, 18 percent were between the ages of 16 and 18, 14 percent were over 18, and the ages of the remaining victims were unreported (Voice for Justice and Jubilee Campaign 2022).

Regrettably, many cases of forced conversions go unreported; however, digital and social media have brought international attention to numerous particularly egregious cases that may otherwise have never garnered global advocacy and calls for justice. Unfortunately, not all families have means to report their cases to the police, and therefore the total number of abductions and forced conversions of women and girls is plausibly much higher than the number of cases reviewed here. Estimates regarding the number of minority-faith girls abducted and forcibly converted to Islam annually range between 1,000 and 2,000 (All-Party Parliamentary Group for the Pakistani Minorities 2021; International Christian Concern 2022). Moreover, access to authorities who file First Information Reports (FIRs)³ on behalf of complainants is limited and depends on the resources and diligence of the police stations in the regions discussed.

Although our study focuses specifically on Christian minorities, similar concerns have been raised among other minority communities, including Hindus and Dalits (i.e., Scheduled Castes) and Sikhs. The Centre for Social Justice Pakistan, for example, in its 2023 report discussed the trends of abductions and forced

³ First Information Reports are documents filed by local police upon receiving information about the possible commission of a cognizable offense.

conversions of women and girls among a wider selection of religious minority groups. That study indicated that 124 cases involving 120 Hindu, 80 Christian, and two Sikh girls or women were reported in the year 2022 alone, exhibiting a 59 percent increase as compared to 78 cases in 2021, and a nearly 200 percent increase over the 43 cases in 2020 (Centre for Social Justice Pakistan 2022; CSJ 2023).

3. Ineffectual legislation and relevant case studies

Every Pakistani citizen is afforded the right to “profess, practice and propagate his religion” as well as to “establish, maintain and manage its religious institutions” by Article 20 of the 1973 Constitution of Pakistan, though the document explicitly identifies Islam as the state religion and fails to offer any special safeguards of the rights of minority faiths present in the country (National Assembly of Pakistan, 1973). Children of minority faith communities are made even more vulnerable by the incongruity of domestic legislation and international human rights standards, the discrepancies among provincial authorities’ application of federal laws concerning child rights, and the repeated obstacles to improving such legislation on account of the issue’s divisive nature.

Faith conversion is legally permissible in Pakistan; however, in practice, the National Database and Registration Authority (NADRA) places a restriction on conversion away from the majority religion, Islam. According to its policy, the modification “from other religions to Islam” in the religion column of citizens’ national identity cards is permissible, but it is absolutely prohibited to change one’s faith “from Islam to other religions” after applicants have previously submitted a declaration professing their religion as Islam at the time of registration with NADRA (National Database and Registration Authority 2019; NADRA International Operations Department n.d.). Exploiting the legal gaps that provide cover to individuals who may use illicit means to induce another to convert religions, perpetrators compel girls to abandon their faith and nonconsensually “accept” Islam, which subsequently offers an additional criminal pathway through which middle-aged Muslim men can marry girls one-third their age and escape punishment.

Sharia law, derived from Quranic principles, allows the marriage of girls who have reached the age of “maturity”; this ambiguous classification is open to interpretation by each judge, many of whom in Pakistan are conservative Muslims and therefore define it as the time when a girl experiences her first menstrual cycle (Lee 2013). In early 2020, months after the abduction of a 14-year-old Christian girl, Huma Younas, by three Muslim men, a court rejected her family’s claims that Huma was underage and therefore forcibly and illegitimately married. Instead, the court declared that her marriage was acceptable because she had converted

to Islam and had reached the age of menarche (Perttula 2020). Similarly, in 2021, the Lahore High Court overlooked myriad documented evidence of 13-year-old Christian girl Chashman Kanwal's age – her birth certificate, school enrollment records, NADRA child registration documents, and medical evaluation results – provided to the court by her father and decided that despite her young age, individuals who have reached puberty are marriageable and may change religions (Voice for Justice and Jubilee Campaign 2022).

Many perpetrators acquire the assistance of Islamic clerics, mosques, madrasas, and Muslim organizations to arrange and expedite illegitimate faith conversions and underage marriages. In January 2019, a Muslim man, Zafar Iqbal, kidnapped the young daughter of his Christian neighbors, Charlotte Javed, and took her to a mosque in Faisalabad District where three clerics “offered” to convert her to Islam. Upon Charlotte's refusal, the three men physically assaulted her and forcibly took her thumbprint to seal a faith conversion certificate and a marriage certificate (Voice for Justice and Jubilee Campaign 2022). In another incident, a 13-year-old Hindu girl, Kavita Oad, was abducted by an Islamic cleric, Miam Mithoo, who has an infamous reputation for running a “conversion factory” by which he organizes and conducts numerous kidnappings (OpIndia 2021, 2023).

Should any complaints or concerns be raised against these abhorrent “marriages,” both parties involved – the victim and the kidnapper alike – are considered legally Muslims (despite the victim's lack of consent in faith conversions), and therefore their cases are presided over by Sharia courts, thus providing perpetrators with protection against charges they would face in secular courts. As such, existing – though relatively inefficacious – laws designed to crack down on these activities, such as the 1929 Child Marriage Restraint Act, are not applied and become useless, with the exception of cases in which female victims bravely attest to the fact that they were abducted and nonconsensually forced to become Muslim. Had these cases been tried with consideration to the 1929 law, which explicitly criminalizes the facilitation, formalization, and solemnization of an adult's marriage to a child, female victims would face far fewer obstacles to seeking justice for themselves and securing punishment of their abusers (Government of Pakistan 1929).

Numerous courts across Pakistan have deplorable track records of accepting, without due scrutiny and inspection, forged documents provided by perpetrators that dishonestly raise the ages of their victims and misrepresent their faith conversions and contractual marriages as consensual and legitimate. In September 2020, 12-year-old Christian girl Farzana Sohail was ordered to remain in the custody of her abductor, Muslim man Arif Ahsan, following a court's approval of fabricated birth certificates, religious conversion certificates, and marriage

documentation. Authorities acted to rescue Farzana only following community backlash in which residents organized sit-in protests at the police station (Voice for Justice and Jubilee Campaign 2022). In 2021, a Gujranwala court accepted counterfeit documents provided by NADRA that mischaracterized abducted 15-year-old Christian girl Sunaina James Masih as 19 years old. Sunaina's mother, Nazia, filed a petition – which was ultimately dismissed – with the Federal Investigation Agency against NADRA for manipulating family registration papers and birth certificates, the latter of which alleged Sunaina's birth year to be 2002, which was an entire year prior to her parents' marriage in 2003 (Voice for Justice and Jubilee Campaign 2022). Similarly, notwithstanding pleas from 13-year-old abducted Christian girl Shakaina Johnson's parents to rescue their young child, who had been kidnapped in February 2021, Lahore authorities instead presented them with a Nikahnama – an Islamic marriage certificate – provided to them by her kidnapers (Voice for Justice and Jubilee Campaign 2022).

The converse – in which court officials are also disgracefully inclined to reject irrefutable evidence and victims' testimonies of crimes committed – is equally true. Distinct from their moderate Muslim compatriots who are amenable to measures promoting religious liberty, Pakistan's extremist Muslims seek aggressively to expand the number of believers in Islam. This intransigent atmosphere discourages state actors from impartially reviewing cases, as unbiased verdicts against perpetrators based on criminal intent and harm incurred may provoke excitable segments of the Muslim population. Judicial authorities must conscientiously toe the line between legal duties and responsibilities, on one hand, and acquiescence to inflammatory social demands on the other hand.

Following the abduction of 13-year-old Christian schoolgirl Zarvia Pervaiz by Muslim man Imran Shahzad in April 2022, the Lahore High Court rejected authentic transcripts of phone conversations Zarvia shared with her parents in which she explained that she had been kidnapped, converted to Islam, and married to her abductor against her will, and in which she expressed her wish to return home to her family (Voice for Justice and Jubilee Campaign 2022). Overlooking this information, the court remanded Zarvia to the custody of Shahzad who then subjected Zarvia to atrocities including, but not limited to, forced ingestion of drugs and alcohol, vaginal and anal rape, starvation, forced physical labor, physical assault with sticks and hammers, and electrocution. Zarvia tried to escape captivity multiple times but was repeatedly caught and punished severely by Shahzad, his wife Adiba, and the couple's accomplice Liaquat; she suffered so much abuse that she attempted suicide. Zarvia spent six torturous months in captivity, a period that could have been greatly reduced if authorities had exercised due diligence (Voice for Justice and Jubilee Campaign 2022).

Slightly older than the other girls whose cases have been reviewed, 19-year-old Mehwish Patras managed to flee in 2021 from nine months of captivity imposed by her kidnapper-turned-husband and recorded a statement with a court in Bahawalpur. She explained that she had been abducted against her will and that her previous testimony to the court – in which she claimed that she left home, converted to Islam, and married a man according to her own free will – had been made under duress after her captor threatened her own and her family members' lives. Reprehensibly, two days after Mehwish filed for dissolution of her coerced marriage, authorities raided the home where she had resided following her escape and threatened her with criminal charges if she did not return to her “husband.” Mehwish was able to resolve her case only by petitioning the Lahore High Court (Office of the High Commissioner for Human Rights 2022).

In 2024, Bitter Winter reported concerning updates on the convoluted and protracted case of Hindu teenage girl Chanda Maharaj, who was initially kidnapped by Muslim man Shaman Magsi in Hyderabad, Sindh in August 2022 (Respinti 2024). Magsi had made previous attempts to approach Chanda before he succeeded in abducting her while she was walking home with her sister one evening. Local authorities were at first unwilling to act on Chanda's family's requests for intervention on her behalf, and only after international media attention highlighted the case were police inclined to take action, rescuing her in October 2022 and placing her in a shelter. Chanda's fragile sense of security in this new location was short-lived, as in that very same month a court ruled that her conversion to Islam and marriage to Magsi were valid and ordered her to return to her captor. Chanda's parents appealed and police for the second time rescued Chanda and transported her to a safe house in December 2022, ignoring her wishes to return to her family.

In other similar cases, courts have prohibited these “Muslim” victims from returning to their family home, citing the inconsistency between their new faith and that of their Christian parents that would preclude their amicable reunion, and disregarding evidence of coercive elements in the victims' “acceptance” of Islam. In Chanda's case, nearly two years after the original kidnapping, a court has determined, based on false biographical records and the history of the case, that she has now reached a “biological age [that] makes her apt to be with her ‘husband.’” Accordingly, the court forcibly returned Chanda once again to Magsi's home without conducting a hearing or speaking with Chanda or her family (Respinti 2024).

The majority of parents of kidnapped girls have lost confidence in police officers, who are reluctant to file FIRs and instead delay investigative measures for

prolonged periods of time. In some instances, police themselves become verbally and physically abusive towards parents who implore them to assist. Farzana So-hail's father reflected on being called a "chuhra," which is an offensive slur and religious insult targeting Pakistani Christians (APPG for the Pakistani Minorities 2021). In September 2020, the father of 12-year-old Christian girl Farah Shaheen was finally able to file an FIR for the rescue of his daughter after four discouraging months of unsuccessful appeals to Faisalabad authorities, who made racist remarks and even threatened to charge him with blasphemy (Tanno and Newman 2021). Rafique Masih, the father of 17-year-old Christian girl Mashal Rafique Masih, faced similar derision in 2021 when he visited the Bani police station to file a complaint after his daughter was abducted by three Muslim men while he was at work. Police officers ridiculed and mocked Rafique for some time before registering the FIR (Pakistan Christian Post 2021).

In late 2019, the parents of 13-year-old Catholic girl Samra Munir reached out to police after their son reported witnessing Samra being physically forced into a vehicle while he was returning home from the market. Police repeatedly refused to register an FIR and warned the distressed and inconsolable parents not to cause a scene; authorities later claimed that Samra chose to convert to Islam and marry a Muslim man, and they demanded that her parents stop visiting the police station (Yousef 2019). In June 2022, the parents of 15-year-old Roman Catholic girl Saba Masih campaigned for international attention after Punjab authorities repeatedly refused to file a complaint regarding the girl's abduction, even though her older sister had witnessed the incident and identified the perpetrator – the family's Muslim adult neighbor Muhammad Yasir. Only after intervention by a local organization, Human Rights Focus Pakistan, were Saba's parents able to register an FIR, as previously the police would not even listen to their pleas (Kumar 2022).

In response to the abduction, forced conversion, and child marriage of 14-year-old Christian girl Alina Khalid in June 2024, Chairman of the Raah-e-Nijaat Ministry Mr. Safdar Chaudhry condemned the police's 26-hour delay in filing an FIR, which granted Alina's abductor Haider Ali ample time to disappear along with his victim. Authorities have failed to rescue Alina and arraign Ali, causing her family tremendous distress; the health of Alina's mother, who is afflicted with hepatitis C and diabetes, has deteriorated due to the psychological trauma of losing contact with her child (Christian Daily International 2024).

In some cases, police inaction can prove to have lethal and irreversible consequences, as evidenced by the case of 20-year-old Salma Munir, a Christian woman with a mental disability. A resident of Punjab's Sheikhpura District, Salma was targeted for kidnapping by Muslim neighbor Omer Khokhar, who took advantage

of her disability, repeatedly raped her, and subsequently sold her to a brothel in February 2024. Salma's parents visited local authorities to file a missing persons case immediately following her disappearance, but their urgency and desperation were ignored by police. Salma reappeared four months later when her elder brother rescued her from a rickshaw in which she was placed beside other women by the madam of the brothel where she was detained (Morning Star News 2024b). Salma's health had deteriorated irreversibly during her prolonged period of exploitation; at her time of her rescue, she was bleeding profusely, and despite efforts to find medical treatment, within two days she passed away from injuries sustained while in captivity. Less than one month after the family buried Salma, her abductor Khokhar attempted to kidnap her younger sister Nisha, threatening "that she would suffer the same fate as her sister if she did not surrender to his sexual demands" (Morning Star News 2024b). After half a year of inactivity on Salma's case, the police intervened only after her death and after the threats were leveled against Nisha; Khokhar has been detained but his family continues to harass the family of Nisha and Salma.

Child marriages and forced conversions are possible only if perpetrators are successful in separating their victims from their families and severing all communications between the parties. Where child marriage prohibition laws fail to protect vulnerable minority-faith girls, laws criminalizing abduction and kidnapping could offer some recourse. Unfortunately and not surprisingly, however, these laws are similarly ineffective. Penal Code Article 361 imposes a period of imprisonment not exceeding seven years, accompanied by an undetermined fine, on any individual convicted of kidnapping a boy under age 14 or a girl under age 16 from lawful guardianship (Government of Pakistan 1860). Article 362 clarifies the distinction between kidnapping and abduction, the latter of which is the use of force to "compel, or by any deceitful means induce, any person to go from any place," a crime punishable by a maximum of ten years' imprisonment and a fine (Government of Pakistan 1860). A 1958 amendment to the penal code added a clause to Article 364 stipulating a term of "rigorous" imprisonment from seven years to life or, alternatively, the death penalty for any individual convicted of kidnapping or abducting a child under age 14 for the purposes of murder or subjection to "grievous hurt," slavery, or "the lust of any person." Article 366A criminalizes with a maximum of 10 years' imprisonment the abduction or kidnapping of a girl under 18 for the purpose of forcible seduction to "illicit intercourse" (Government of Pakistan 1860).

Regrettably, however, numerous perpetrators of these egregious crimes are not properly punished, even after their victims are rescued and provide testimonies that lead to initial criminal charges. In September 2020, Faisalabad authori-

ties rescued Farah Shaheen from the captivity of the three Muslim men who had forced her to engage in unsafe labor. Despite the conditions in which she was found – chained to a cattle pen where she was forced to clean up dung, and covered with injuries and wounds indicating restraint, physical and sexual violence, and coerced labor – courts did not indict the primary perpetrator, Khizar Hayat (Ochab 2021). One of the most notorious cases is that of 13-year-old Christian girl Arzoo Raja, abducted in 2020 by a Muslim neighbor 31 years her senior, Ali Azhar. She was forcibly converted to Islam and married to Azhar, who was already a husband and father. Despite her parents' unwavering appeals for Arzoo's rescue, authorities released Azhar from prison on bail, which reputable Pakistani human rights lawyer Saiful Malook noted is a likely indicator that he will evade prosecution (Church in Chains 2022).

For Christian teenager Charlotte Javed, who was kidnapped by Muslim man Zafar Iqbal in January 2019 and subsequently escaped from the small, locked room in which she was confined for two months, numerous factors led to the victim's family's decision to stop pursuing the case, even in light of obvious criminal conduct. Though no explicit reason was provided as to why Charlotte's family declined to press charges against Zafar following his release on bail, most likely they lacked the financial resources to do so, as they are a relatively poor family, and feared the possibility of retaliation by the perpetrator, who was their neighbor (Voice for Justice and Jubilee Campaign 2022).

4. Futile attempts at legislative reform, and encouraging developments

There have been several attempts over the past few years to respond to the undeniably escalating frequency of abductions, forced conversions, and child marriages of Christian and Hindu girls in Pakistan. In 2016, the Sindh Assembly passed the Criminal Law (Protection of Minorities) Bill outlawing forced conversions or conversions before the age of majority; however, Governor Saeed-uz-Zaman Siddiqui refused to give his assent to the bill, based on the objections raised by a religious-political party (Tunio 2017). In 2019, another bill was presented, but it was rejected after a similar reaction by religious groups (Library of Congress 2016). In 2021, the Muslim members of the Parliamentary Committee to Protect Minorities from Forced Conversions refused to consider the "Prohibition of Forced Conversions Bill 2021" for vetting by the parliament, due to opposition led by the Ministry of Religious Affairs and the Council of Islamic Ideology. They asserted that the bill was fundamentally against the principles of Sharia, and they claimed it was an attempt to limit Muslims' right to convert non-Muslims to Islam (Gurmani 2021).

Similar efforts have been taken by various state actors in Pakistan to increase the minimum age for marriage, but these efforts have also been rejected as an-

ti-Islamic in nature. In October 2017, the Senate Standing Committee on Interior rejected the Child Marriage Restraint (Amendment) Bill of 2017 as “un-Islamic” (Junaidi 2017). A couple years later, Pakistani senator Sherry Rehman introduced an updated version of the same bill with minimal revisions – the Child Marriage Restraint (Amendment) Bill of 2019 – which would raise the legal minimum age for marriage to 18 years and punish violators with three years’ imprisonment. The bill only passed the Senate after rigorous debate and discord, including remarks by Jamiat Ulema-i-Islam (JUI-F) Senator Ghafoor Haideri that “Islam allows marriage before puberty”, a sentiment which was then echoed by Jamaat-i-Islami (JI) Senator Mushtaq Ahmad that the protective bill would be “against the Shariat” (Hussain 2019). In response to these grievances, Senator Rehman explained that implementing a law protecting children from underage marriage would not be against the Sharia or an act of “promoting western culture”. Rather, it would be an acknowledgement of the global consensus that marriage of children under 18 is morally “wrong” and a guarantee that Pakistan would work towards eliminating the abhorrent practice (Hussain 2019). Senator Rehman additionally noted that her bill received unanimous endorsement from the Senate Standing Committee on Human Rights. The bill withstood dissent, and a day after it passed in the Senate, Assemblyman Ramesh Kumar Vankwani of the ruling Pakistan Tehreek-i-Insaf (PTI) introduced its bicameral counterpart in the National Assembly, evoking a similarly divisive response by members. Religious Affairs Minister, Noorul Haq Qadri, and Minister of State for Parliamentary Affairs, Ali Mohammad Khan vehemently rejected the bill and urged that it be reviewed by the Council of Islamic Ideology (CII). Further clarifying his oppositional stance to the Child Marriage Restraint (Amendment) Bill, Minister Khan stressed that he would dispute the bill “even at the cost of his cabinet position” (Wasim 2019). News reporters who witnessed the debate recalled Minister Khan stressing that “even the whole house could not pass any legislation which was against the teachings of [the] Quran and Sunnah” (Wasim 2019). After months of heated deliberation, the National Assembly Standing Committee on Law and Justice capitulated to demands of the bill’s fiercest adversaries, ultimately rejecting it “with more than double votes majority” thereby indefinitely stalling progress of the Child Marriage Restraint (Amendment) Bill for the time being until a new variant is inevitably introduced to one of the two houses of Parliament (Anis 2019; Javed and Mughal 2019). The perpetuity of socioreligious discord in the nation’s legislature – which scholars recognize is wracked by a schismatic “social divide” – is especially perplexing considering that other predominantly Muslim countries have made strides in outlawing child marriage, such as Bangladesh, Turkey, and the United Arab Emirates (Javed and Mughal 2019; Wasim 2019).

In a positive recent development, the government of Balochistan finalized and forwarded to the provincial assembly a draft law, the Balochistan Child Marriage Prohibition Act, that would crack down on underage marriages in the region. The provincial government also sent draft legislation to the Federal Shariat Court which had recently taken notice of a case in which a five-year-old girl had been sold into marriage by her father, who was being harassed to do so by tribal elders. Shariat Court Chief Justice Syed Muhammad Anwer has found that child marriage in itself is “un-Islamic” as well as contrary to the Constitution (Iqbal 2023). Chief Justice Anwer’s opinion – which opposes those raised by other political figures who cite Islamic principles to justify child marriage – demonstrates the lack of consensus among state actors and authorities regarding the legality and humanity of the practice. Such variation and polarity in public opinion complicates efforts to adopt a standardized approach to combatting the marriage of minors in Pakistan. Chief Justice Anwer had dismissed, a few months earlier, a petition against the Sindh Child Marriage Restraint Act, stating that the bill “is in line with the Islamic teachings of protecting the rights of children and ensuring their well-being” (Malik 2023). Presently, the only provincial legislation that potentially covers cases of underage marriage, albeit indirectly, is the 2016 Balochistan Child Protection Act, which identifies forced marriage as a form of “sexual abuse and exploitation” and assigns child protection officers to intervene in such cases on behalf of and in the best interests of the child (Balochistan Provincial Assembly Secretariat 2016; National Commission on the Rights of the Child 2023).

In April 2024, United Nations experts, including the Special Rapporteurs on contemporary forms of slavery, trafficking in persons, freedom of religion or belief, and minority issues, published a joint statement expressing concern about the abduction, forced religious conversion, and child marriage of Hindu and Christian girls in Pakistan. Highlighting multiple specific cases, this cohort of experts concluded that “under international law, consent is irrelevant when the victim is a child under the age of 18”, and that Pakistan must align domestic policies with global consensus by developing “provisions to invalidate, annul or dissolve marriages contracted under duress” and “ensure access to justice, remedy, protection and adequate assistance for victims” (Office of the High Commissioner for Human Rights 2024). Days later, an unrelated but relevant development occurred when Lahore High Court Justice Shaid Karim publicly criticized the Punjab Child Marriage Restraint Act, which he called “discriminatory” for its discrepancy between the minimum marriageable age for boys (18 years) and girls (16 years) (Morning Star News 2024c). In his five-page written decision, which echoed many of the concerns raised by the UN experts, Justice Karim concluded that the different age thresholds, “being unconstitutional, are held to be without lawful authority and of no legal

effect. They are struck down” (Morning Star News 2024c). He additionally ordered the provincial government of Punjab to present an amended rescript of the Child Marriage Restraint Act that would abide by his judgment and constitutional provisions guaranteeing citizens equal protections under the law. Justice Karim made a specific reference to the Act’s definition of a “child,” noting that while establishing a minimum age for marriage “is indeed a special provision for the protection of women,” men and boys are offered greater protection “by keeping their age of marriage higher than females” (Morning Star News 2024c). Punjab’s office of the advocate general contributed greatly to this judicial decision by providing Justice Karim with demographic statistics exhibiting an increase in rates of child marriage at the age of 15; the report also highlighted the detrimental effects of the practice on maternal health and educational attainment.

The very threat of child marriage directly imperils girls’ academic life, as evidenced when Christian father Salman Masih reluctantly had to remove his 15-year-old daughter, Muskan, from her school in early 2024 after she confided in him that a Muslim man was regularly harassing her on her way to school. Muskan was subsequently kidnapped by the man, Arsalan Ali, who Salman Masih fears may sell Muskan into sex trafficking due to his “notorious reputation” (Morning Star News 2024d).

Ten days after Justice Karim published his decision, the chair of the Child Protection and Welfare Bureau (CPWB), Sarah Ahmad, also a member of Punjab’s assembly, presented a draft of the revised Child Marriage Restraint Act of 2024, which would set the minimum age for marriage at 18 years for both girls and boys and would penalize violators (Morning Star News 2024a). Under this law, any individual (i.e., parents, guardians, friends, neighbors, religious clerics, educators, etc.) who facilitates an underage marriage would be subject to imprisonment for two to three years, accompanied by a fine of between 100,000 and 200,000 rupees. In another effort to safeguard minors from child marriage, the Act requires the marriage registrar, solemnizer, and secretary of the union council to exercise due diligence and review all documentation – such as national citizenship cards, passports, and school transcripts – to establish that both marriage parties have reached age 18. The bill dictates that “in case of any dispute regarding determination of age of any of the parties to marriage, the court shall determine the age on the basis of birth certificate, educational certificate or other necessary documents after hearing the case,” with medical examinations for age determination mandated in the absence of the above documentation (Morning Star News 2024a).

Human rights activists have welcomed the proposed bill, but they remain cautiously optimistic as sufficient implementation will be the litmus test of its

efficacy. Historically in Pakistan, enforcement of legislation protecting women and girls has often been negligible. Should the new 2024 Punjab Child Marriage Restraint Act prove successful, it could set a precedent and serve as the foundation – along with the Sindh Child Marriage Restraint Act – for similar legislative measures to be taken in the provinces of Khyber Pakhtunkhwa and Balochistan. Calls for child marriage prohibition in Khyber Pakhtunkhwa were reignited in April 2024 when the Adolescent Sexual and Reproductive Health Project, which operates in 10 of the province's 38 districts, found that half of all patients visiting clinics in the Hazara Division with reproductive health problems and psychological issues were “child brides” (Khan 2024).

During a parliamentary session in May 2024, Senator Danesh Kumar Palyani publicly excoriated the government's inability to counter the practice of forced marriage: “The daughters of Hindus are not a booty that someone should forcibly change their religion. ... The government does not take action against these influential people. ... A few dirty eggs and robbers have defamed our beloved motherland Pakistan. The law of Pakistan does not allow forced religious conversion and neither does the Holy Quran” (Bhattacharya 2024). Months later, in July 2024 the National Assembly of Pakistan ratified the Christian Marriage (Amendment) Act of 2024, introduced by assembly member Naveed Amir Jeeva in an effort to raise the minimum age of marriage to 18 years for both boys and girls in the Christian minority community (John 2024). Having already been introduced in the Senate by Christian Senator Kamran Michael and approved in 2023, its acceptance in the National Assembly was a landmark decision of multilateral and bicameral consensus, and it led to the president's ratification of the bill during a special ceremony in July 2024 (Office of the President of Pakistan 2024). President Asif Ali Zardari's signature was attended and witnessed by Federal Minister for Religious Affairs and Interfaith Harmony (MORA), Chaudhry Salik Hussain, and Secretary Minister MORA, Zulfiqar Haider (Office of the President of Pakistan 2024). Both the National Council of Churches in Pakistan and the Catholic Bishops' Conference of Pakistan have lauded the Christian Marriage (Amendment) Act of 2024 and the Punjab Child Marriage Restraint Act of 2024 as signifying a “major gain in the struggle to protect minority girls” (John 2024). Faith rights activists have emphasized the need for strict and uniform implementation, noting that “the new law needs to override all ‘special’ laws and maxims relating to determining a girl's age of maturity,” namely Sharia law (John 2024). Some researchers have been more explicit in their concerns regarding the new Christian Marriage (Amendment) Act, highlighting the glaringly obvious shortcoming in that it raises the marriageable age for Christians only and would therefore be ineffectual in cases where “courts and police protect the Muslim abductors” and recognize

forcibly converted faith-minority girls as Muslims in the eyes of the law (Introvigne 2024). After all, the new bill's predecessor, the Christian Marriage Act of 1872, was in effect for 152 years with minimal protective and prosecutorial accomplishments (Introvigne 2024).

5. Conclusion

The frequent reports of forced conversion in Pakistan are linked with the state's abject failure to implement and enforce existing laws that aim to stymie abduction, child marriage, and forced marriage, especially when the victims are from religious minority communities. Regrettably, there are no official statistics regarding the number of forced conversions to Islam of girls from religious minority communities; however, we believe our analysis of select cases offers insight into the prevalence of this harmful and inhumane practice, as well as the climate of impunity, state actor complicity, and biased judicial discretion that provides cover for bad actors to commit these heinous crimes. Our observations dispute Pakistan's claims in its December 2022 periodic report to the United Nations Human Rights Committee that "its criminal justice system is vigilant in respect of forced marriages and if any individual case is reported by media or through aggrieved parties, institutional mechanisms and courts take the matter very seriously and conduct proper administrative and judicial enquiries to ensure justice" (UN Human Rights Committee 2022).

In some horrific cases in which abducted girls remain in the custody of their kidnappers, the victims are sexually assaulted and at a higher risk of developing sexually transmitted infections and becoming pregnant. In July 2020, Christian girl Huma Younas was reported to be pregnant as a result of rape in captivity following her abduction nine months earlier (OpIndia 2020). Child brides have a greater likelihood of school dropout, health-related complications, lower labor force participation and earnings, and lack of decision-making power within the family. The abduction of schoolgirls hinders their access to opportunities such as education, skill development, and employment, all of which are essential to lead a dignified and self-sufficient life (Voice for Justice and Jubilee Campaign 2022). Pregnancy at a young age affects the health and well-being of girls, reduces the chances of their return to their family, and leaves them with no other choice but to bear the brunt of discrimination and marginalization for a lifetime. The abducted girls from minority communities are never accepted by their in-laws as daughters-in-law; rather, they are treated as *de facto* domestic servants.

In some fortunate cases, female victims of abduction, faith conversion, and child marriage have been rescued and reunited with their families, but they can rarely return to their previous lives and relationships. Following Charlotte

Javed's escape from the custody of Zafar Iqbal and her return to her parents who had been restlessly pursuing her rescue, she was never able to rekindle her relationship with her brothers, who chastised Charlotte and declared that it would have been better if she stayed with Iqbal as she had brought dishonor upon her family (Razzaq 2022). Many survivors experience post-traumatic stress disorder (PTSD), with symptoms including flashbacks, nightmares and sleep disturbances, severe depression and anxiety, social isolation and detachment disorders, anger outbursts, memory loss and dissociative amnesia, alexithymia (loss of emotion), poor self-esteem, hypervigilance, and somatic symptoms. Female survivors may lose interest in activities they previously enjoyed, face difficulties in concentrating on studies or work, and struggle to participate meaningfully in everyday situations. Following her liberation due to police intervention, Farah Shaheen's father has observed changes in her behavior, including mutism, lack of emotional response, and nightmares (Razzaq 2022).

In December 2022, Pakistan boasted that it had become one of the first United Nations member states to propose the goal of eradicating child marriage by 2030 during a meeting of the Open Working Group on the Sustainable Development Goals (UN Human Rights Committee 2022). To fulfill this expressed commitment, Pakistan must take genuine steps including, but not limited to, (1) guaranteeing affirmative action for the protection, promotion, and fulfillment of minority rights; (2) establishing an independent committee of experts comprising jurists, legal experts, human rights activists, and faith minorities to prepare a bill to inhibit forced religious conversions; (3) undertaking comprehensive research on the prevalence and patterns of kidnappings, coercive conversions, and child marriages of minority-faith girls; (4) comprehensively training police officers, religious actors, and judicial authorities regarding international standards of human and children's rights; (5) exhausting all legal means to investigate any allegations of kidnappings, forced religious conversions, and marriages of underage girls; (6) impeding the issuance of fabricated religious conversion and marriage documentation and courts' acceptance thereof; (7) prioritizing authentic birth certificates, national identity cards, family registrations, and medical evaluations; and (8) providing due process and protective measures to female victims and their families during trial proceedings.

Mehdi Hasan, chairperson of the Human Rights Commission of Pakistan, poignantly emphasizes that looking at the "big picture" and examining the practice of abductions, forced religious conversions, and child marriage from an interdisciplinary lens serves to enhance global understanding of and efforts to counteract this depraved trend, which is affecting not only Pakistan but numerous other nations in the Global South such as Egypt, Nigeria, Sudan, and northern Iraq and Syria (Bhattacharya 2024). Hasan stated:

This appears to be a systematic, organised trend and it needs to be seen in the broader context of the coercion of vulnerable girls and young women from communities that are already marginalized by their faith, class and socioeconomic status. The ugly reality of forced conversions is that they are not seen as a crime, much less as a problem that should concern “mainstream” (Muslim) Pakistan. (Bhattacharya 2024)

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