

## Legal framework

Pakistan is an Islamic republic, and the majority of the population follows Sunni Islam, but the constitution guarantees freedom of religion or belief (FoRB) for all and specifically protects religious minorities.

Pakistan's blasphemy laws criminalise anyone who insults Islam, including by outraging religious feeling (Section 295(A)), defiling the Qur'an (295(B)), and defiling the name of the Prophet Mohammed (295(C)), which carries the death penalty or life imprisonment. Bail is granted at the discretion of the court. The law is poorly defined and has low standards for evidence, as it does not require specific proof of intent to commit blasphemy. As a result, spurious accusations are common and levied maliciously against both Muslims and non-Muslims to settle personal disputes.

On 19 June 2014 Pakistan's Supreme Court issued a landmark ruling on religious minorities that called for the establishment of a National Council for Minorities, the revision of school curricula, the protection of places of worship, human rights training for law enforcement agencies, the implementation of job quotas for religious minorities in public sector employment, and the creation of a special task force to monitor the implementation of the Supreme Court's directives. Implementation of this judgement has been slow, and nominal steps towards it have yet to translate to significant improvements in reality.<sup>1</sup>

The Ahmadiyya community is the most widely institutionally and constitutionally persecuted religious group in Pakistan. Various laws categorise Ahmadiyyas as 'non-Muslims' and place restrictions on the community, including a 1974 constitutional amendment, 1984 Ordinance XX (20), and sections 298(B) and (C) of the penal code.

## Blasphemy charges

According to the Centre for Social Justice (CSJ) in Pakistan, at least 344 individuals were accused of blasphemy in 2024, up from 329 in 2023; 70% of the accused were Muslims, 14% were Ahmadis, 9% were Hindus, and 6% were Christians.<sup>2</sup> Many others remain imprisoned or on death row.

Blasphemy accusations can also trigger mass violence against minority communities. On 16 August 2023 a large mob attacked the Christian colony of Essa Nagri in the city of Jaranwala in Punjab province after two young Christian men, Rocky Masih and Raja Masih, were accused of blasphemy. The mob was mobilised through the loudspeakers of local mosques and demanded that the two accused be handed over so that they could lynch them, despite police assurances that the pair would be dealt with according to the law. At least 21 churches and hundreds of homes were vandalised and burnt in the ensuing violence.

On 25 May 2024 members of the Muslim community in Mujahid Colony, Sargodha District, broadcast accusations that 73-year-old Christian Lazar Masih had burnt pages of the Qur'an, prompting a mob of over 1,000 people to attack Mr Masih's home and the shoe factory he had owned in the area for six years. The mob threw stones and bricks at Mr Masih and beat him with steel rods before he was rescued by local police. He was placed in critical condition in the Combined Military Hospital (CMH) Rawalpindi due to his multiple head injuries. He passed away in the early hours of 3 June due to multiple organ failure and was swiftly buried in his hometown of Sargodha.

## Violations against religious minorities

There is entrenched discrimination in Pakistan against members of the Christian and Hindu communities, most of whom are working class, have low levels of education, and work as labourers.

Since the mass exodus in 1947 of Hindus during Partition there has been a continued decline in their numbers, with many migrating to India due to the rise in discrimination and religious polarisation. A false narrative that Partition created Pakistan as a separate state for Muslims is pushed by right-wing elements including politicians and reinforced in the education system, with school textbooks, particularly on the subject of Pakistan Studies and History, further stigmatising Hindus. Many come from the scheduled and lower castes, and as a result face deep rooted marginalisation.

The legacy of the caste system means Christians are often perceived as unclean by the Muslim majority. They are also perceived as being sympathetic to the 'West', making them targets of Islamist groups. This idea is partly based in the fact that in the past, school textbooks directly connected British imperialism with Christian rule over the Indian sub-continent. Although in a positive development these claims have since been removed from school materials, it will take time and effort to change this perception.

The Shi'a community has also experienced sectarian violence in recent years. In one recent example in November 2024 convoys of Shi'a pilgrims were attacked in Parachinar, Kurram District in Khyber Pakhtunkhwa Province. Gunmen opened fire on two separate convoys of pilgrims travelling with police escorts leaving between 42 to 100 people dead including women and children.

The Ahmadiyya community faces persistent and systematic structural discrimination, and targeted physical violence. According to the International Human Rights Desk (IHRD) of the Ahmadiyya Muslim Community in the UK, six Ahmadis were murdered for their faith in 2024, a significant increase on one religiously motivated murder in 2023. Among them was Tayyab Ahmad, who was murdered with an axe on 9 December 2023 after being told that 'Qadianis' (an anti-Ahmadi slur) should leave the area.<sup>3</sup> The IHRD also reports

1 FoRB in Full, 'Ten long years: Reflections on the Supreme Court ruling that promised much for Pakistan's religious minorities', 19 June 2024 <https://forbinfull.org/2024/06/19/ten-long-years-reflections-on-the-supreme-court-ruling-that-promised-much-for-pakistans-religious-minorities/>

2 Centre for Social Justice in Pakistan, 'Human Rights Observer 2025', April 2025 <https://csjpak.org/human-rights-observer-newsletter/Human-Rights-Observer-2025.pdf>

3 CSW, 'Ahmadi man killed in religious motivated attack', 9 December 2024 <https://www.csw.org.uk/2024/12/09/press/6388/article.htm>

that 22 Ahmadi mosques were attacked, and 308 Ahmadi graves were desecrated in 2024.

On 28 February 2025 at least 28 Ahmadi Muslims were arrested and 23 others had a criminal case registered against them in three separate incidents in Punjab Province, two days prior to the start of Ramadan. This echoes similar targeting of the community during Ramadan in 2024, during which 35 Ahmadis were detained, including a 13-year-old child, and at least three separate instances of Ahmadis being prevented from offering Eid prayers were recorded.

On 18 April 2025 an Ahmadi man identified as Laeeq Ahmad Cheema was violently beaten by members of a mob of around 400 people affiliated with the far-right Islamist political party Tehreek-e-Labbaik Pakistan (TLP) who had stormed an Ahmadi mosque in Saddar, Karachi in an attempt to prevent them from participating in Friday prayers. Mr Cheema later died from his injuries in hospital.<sup>4</sup>

### Abduction, rape, forced conversion and marriage

Cases of abduction, forced conversion and forced marriage of Christian and Hindu girls have increased in recent years, particularly in Punjab and Sindh provinces. Girls from 'low' caste Hindu communities are particularly at risk. Many of those kidnapped are forcibly converted to Islam and married off to their abductors.

Perpetrators are emboldened by a culture of impunity, and victims and their families are often intimidated by abductors and their relatives. As a result, crimes are often unreported and figures underestimated. The failure of law enforcement officials to carry out proper investigations further impedes justice.

According to the CSJ, there were 83 registered cases involving the abduction, forced conversion, and forced marriage of religious minority women and minor girls in 2024 – a decrease from 136 in 2023. The true figure is assumed to be much higher as many cases are not reported due to fear of backlash from the abductors or extremist groups.

In a rare positive development, in February 2025 a civil court in Bahawalpur, Punjab, annulled the marriage of Shahida Bibi, a 25-year-old Christian woman who was forced to convert to Islam and marry a Muslim man who had been sexually exploiting her since she was 11 years old.<sup>5</sup> The ruling also directed the National Database and Registration Authority (NADRA) to issue a new identity card for Bibi, reinstating her religious status as Christian and deleting her marital status.

### Biased education and discrimination

The National Curriculum of Pakistan (NCP), formerly known as the Single National Curriculum (SNC), is in its final phase of drafting and was expected to be completed by the end of 2024. The National Curriculum Council (NCC) has prioritised

religious studies while the removal of religious content from non-religious subjects has not been implemented, despite orders from the Supreme Court's One-Man Commission on minority rights. Beyond curriculum content, there is a pressing need to address issues relating to teachers' skills and competencies. Textbook content, teachers' capacity and competencies are also essential for harmonising the classroom and teaching accurate facts and history in relation to the rights and beliefs of religious minorities in Pakistan. Due to a lack of education on human rights in teacher training manuals, and the omission of the contributions of religious minorities towards the country in school textbooks, instructors often lack the teaching and scholastic tactics necessary to engage with students and encourage harmony.

Official textbooks promote intolerance by omitting religious minority heroes, and including errors, omissions, and in some cases derogatory language towards religious minorities. Religious minority students can also face physical and psychological abuse from teachers and classmates. The new curriculum requires students to undergo even more Islamic religious teaching in compulsory subjects, in violation of Article 22(1) of the Pakistani constitution.

Currently, Muslim students who memorise the Qur'an get 20 extra marks towards admission applications for higher education, employment and professional studies. Non-Muslims are often reluctant to opt to study an alternative ethics class because this identifies them as a religious minority and increases discrimination. However, for the first time in the country's history, the NCC has allowed the publication of religious textbooks for students of seven minority religious groups (Bahaism, Buddhism, Christianity, Hinduism, Kalasha, Sikhism and Zoroastrianism) enrolled in educational institutions supervised by the federal government. These books are expected to be introduced in school in the educational year 2025. This is a welcome development among religious minority communities and civil society in Pakistan. Once enacted, students belonging to minority communities will not be required to study Ethics in lieu of Islamic Studies or be forced to take up Islamic Studies in order to better their grades or avoid discrimination from examiners. Despite this encouraging development many academics and civil society members have raised concerns on the practical implementation of such a measure. Due to lack of resources in most if not all public schools and many private schools, there are concerns on how provisions will be made for teachers to teach one or a few students from the religious minority communities.

### Religious discrimination in prisons

According to the CSJ, prisoners belonging to religious minority communities are unable to benefit from jail remission, i.e. reductions to their sentences for good behaviour, outlined in Pakistan's Prison Rules 1978 due to a failure in implementation of existing rules, such as Rule 215 (vii) which states that religious minority prisoners can

<sup>4</sup> Dawn, 'Ahmadi man lynched after religious party demo outside worship place', 19 April 2025 <https://www.dawn.com/news/1905149/ahmadi-man-lynched-after-religious-party-demo-outside-worship-place>

<sup>5</sup> The White Post, 'Pakistani court nullifies forced marriage, restores Christian woman's identity', 3 April 2025 <https://thewhiteposts.com/pakistani-court-nullifies-forced-marriage-restores-christian-womans-identity/>

earn remission by reading and understanding their religious books.

### Threats to lawyers, judges and human rights defenders (HRDs)

Lawyers defending blasphemy-related or other sensitive cases relating to minority issues frequently face intimidation and threats of violence, and in some cases extra-judicial killings. Judges have been physically attacked and threatened with torture, even during court hearings. Many are afraid to hear prominent minority cases for fear of reprisal, resulting in slow progress in these cases.

### Recommendations

#### To the government of Pakistan:

- Review Sections 295(A), (B) and (C) of the blasphemy laws and ensure procedural amendments are implemented to minimise the abuse of these laws in the short term, moving towards full repeal in the long term.
- Ensure adequate protection of the accused, judges, prosecutors, lawyers, and witnesses in cases involving blasphemy charges, and provide reparations to those wrongfully accused of blasphemy.
- Enact legislation that explicitly criminalises forced conversion, ensuring that perpetrators and those complicit in such acts are held to account, and introduce legal safeguards to prevent the misuse of religious conversion claims in cases involving minority girls.
- Amend all existing laws governing marriages of Muslims and religious minorities to standardise the legal age of 18 years for marriage.
- Repeal Sections 298(B) and 298(C) concerning the Ahmadiyya community, in line with constitutional guarantees.
- Rewrite textbooks so that they are based on scientific and empirical principles of thought and inquiry, and incorporate lessons on peace, tolerance, diversity and respect for human rights.
- Review the National Curriculum of Pakistan (NCP) and ensure that it respects and recognises the rights and contributions of religious minority communities in Pakistan.
- Consider removing religious content from non-religious subjects, as per instructions from the Supreme Court's One-Man Commission, which is mandatory for all to study, including religious minorities.<sup>6</sup>
- Develop guidelines for teachers on teaching topics related to religion, culture and gender in an unbiased

and respectful manner to foster an inclusive classroom environment. Provide the necessary protections and safeguards to civil society activists, journalists and human rights defenders (HRDs) and prosecute those who attack them.

- Prosecute and bring to trial without delay all those responsible for committing violent attacks against minorities and other vulnerable groups.
- Fully cooperate with all UN Special Procedures and issue a standing invitation to the UN Special Rapporteur on freedom of religion or belief to visit Pakistan, with unhindered access to all parts of the country.

#### To the United Nations and Member States:

- Urge Pakistan to guarantee the right to FoRB for all, in law and in practice, including by amending or repealing discriminatory legislation, in line with the International Covenant on Civil and Political Rights (ICCPR) to which the State is party.
- Ensure that concerns of violations of the right to FoRB and other intersecting rights are consistently raised with the government of Pakistan, including during high-level visits and other bilateral exchanges, and call on Pakistan to allow impartial and timely investigations into allegations of violations against religious or belief minorities, ensuring that perpetrators are held to account.
- Urge the OHCHR, and all relevant UN mechanisms, including the Special Procedures and Treaty Bodies, to include the right to freedom of religion or belief, minority rights, and the rights of women and girls in their reporting on Pakistan, addressing the vulnerabilities and violations faced by minority religion or belief communities and those seeking to defend them.
- Utilise the Universal Periodic Review process, Human Rights Council sessions and other key international human rights instruments to hold Pakistan accountable for freedom of religion or belief violations and to offer recommendations to advance freedom of religion or belief.
- Urge Pakistan to ensure 'no-one is left behind' when implementing the 17 Sustainable Development Goals (SDGs), including supporting Pakistan in the implementation of goals on education, gender equality, water and sanitation and reducing inequalities.
- Urge the government of Pakistan, at every appropriate opportunity, to make the reforms highlighted in the recommendation section above 'To the government of Pakistan'.

<sup>6</sup> The News International, 'Punjab HR dept directs PCTB to shift all religious content from syllabus to Islamiyat', 22 April 2021 <https://www.thenews.com.pk/print/824253-punjab-hr-dept-directs-pctb-to-shift-all-religious-content-from-syllabus-to-islamiyat>

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