

DRIVERS OF FORCED CONVERSION THROUGH **MARRIAGE** IN PAKISTAN

A Report by Legal Aid Society and The National Commission for Human Rights, Pakistan



This report aims to unravel the drivers behind FCM, focusing on how the minority status of RMCs heightens their vulnerability, and the intersection of gender, religion, and patriarchy within this context.

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Legal Aid Society is registered under the Societies Registration Act, 1860, and was established on 19 November, 2013 (Registration No. KAR 058 of 2013 - 14) and operates under the chairpersonship of Justice (R) Nasir Aslam Zahid.

Year of Publication: 2025



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ACKNOWLEDGMENT

On behalf of the Legal Aid Society, we would like to express our sincere gratitude to everyone who assisted and contributed to this research study. We extend thanks to Haya Zahid (Chief Executive Officer, Legal Aid Society), Rabiya Javeri Agha (Chairperson, National Commission for Human Rights), Nadeem Ashraf (Member Punjab, National Commission for Human Rights), Manzoor Masih (Member Minorities, National Commission for Human Rights), Kalpna Devi (Member, Sindh Public Service Commission), Luke Victor (Legal Expert and Activist), and Naumana Suleman (Academic and Human Rights Professional), for their guidance, feedback, and encouragement. Their insights, expertise and constructive criticism were instrumental in refining the quality of this research study.

We are deeply grateful to the key informants—including civil society members, minority rights activists, and Criminal Justice Sector (CJS) actors—who generously shared their experiences and expertise. Above all, we acknowledge the courage of survivors of Forced Conversion through Marriage, whose willingness to share their stories through in-depth interviews gave this study its depth, purpose, and urgency.

We also recognize the efforts of our research team. Special thanks go to our former Senior Delivery Associate, Savail Fazil Jamili, and research intern, Taha Naseem, for their support with interview transcriptions, and to Rania Yaqoob, former Delivery Associate, for her assistance with secondary data collection. Finally, we thank the wider LAS team for their dedication and support throughout the research process.

This study would not have been possible without the trust, commitment, and contributions of all those mentioned above.

A photograph of a woman and a young girl inside a tent, with a large blue silhouette of a person in the foreground. The woman is wearing a headscarf and a patterned shawl, and the girl is looking directly at the camera. The background is a warm, orange-toned image of the tent's interior.

“

Silenced by Faith

Forced Conversion through Marriage remains a deeply rooted issue in Pakistan, disproportionately impacting minor girls and women from religious minority communities.

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LIST OF ABBREVIATIONS

CJS	Criminal Justice Sector
CLAAS	Centre for Legal Aid, Assistance, and Settlement
CSAE	Child Sexual Abuse and Exploitation
CSJ	Centre for Social Justice
FC	Forced Conversion
FCM	Forced Conversion through Marriage
FM	Forced Marriage
FSC	Federal Shariat Court
GBV	Gender Based Violence
HRC	Human Rights Commission of Pakistan
IDIs	In-Depth Interviews
IHC	Islamabad High Court
KIIs	Key Informant Interviews
LAS	Legal Aid Society
LHC	Lahore High Court
MSP	Movement of Solidarity and Peace
MPL	Muslim Personal Law
NGOs	Non Governmental Organizations
NCHR	National Commission for Human Rights
NRCs	National Rights Commissions
PCMR	People's Commission for Minorities Rights
PPC	Pakistan Penal Code
PTSD	Post-Traumatic Stress Disorder
STDs	Sexually Transmitted Diseases

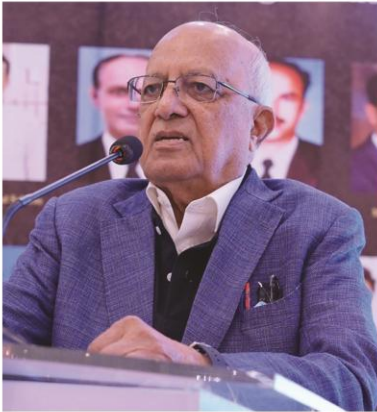
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FOREWORD



JUSTICE (R) NASIR ASLAM ZAHID
Chairperson, Legal Aid Society

In Surah Al-Baqarah, Verse No. 256, Allah Almighty have stated:

"Let there be no compulsion in religion, for the truth clearly from falsehood."

Islam calls for sharing its message with wisdom and kind advice. In multiple verses of the Holy Quran, it has been made clear that faith is a personal journey, which should not be enforced on others. Islam as a religion upholds the freedom of belief and rejects any form of coercion in the matters of faith. However, the frequent occurrence of cases of Forced Conversion and Forced Conversion through Marriage presents a bleak picture of religious freedom in Pakistan. The minor girls and women from Religious Minority Communities being the primary targets of Forced Conversion and Forced Conversion through Marriage face violence, intimidation, and social exclusion.

Since its inception in 2013, the Legal Aid Society (LAS) has been working on safeguarding and protecting the constitutional

and legal rights of the Religious Minority Communities through different interventions, including legislative reforms, policy engagement, and dialogues. Through our work, we have encountered several cases of Forced Conversion and Forced Conversion through Marriage, which have devastating impacts, including physical, mental, and psychological, on minor girls and women from Religious Minority Communities.

So, it is timely and essential to present our research report on the Drivers of Forced Conversion through Marriage in collaboration with the National Commission for Human Rights (NCHR). The research report demonstrates a comprehensive landscape, in which the practice of Forced Conversion and Forced Conversion through Marriage thrives and persists. It identifies the motivations of the perpetrators, which include religious zeal, sexual gratification, and a drive for social dominance, all of which violate the dignity and autonomy of victims/survivors. It offers concrete and actionable recommendations to address this issue from reforming the legal framework to providing rehabilitation services for the victims/survivors.

I commend the researchers, contributors, and everyone involved in this research report for their dedication and perseverance. Their work shines a light on an often-overlooked issue and, importantly, provides us with a roadmap to effect meaningful change. Together, we must act to ensure that no person in Pakistan based on their religious inclinations should face persecution or coercion.

This research report is not just a call to action; it is a declaration of our collective responsibility to stand up for justice, freedom, and the protection of all religious communities. It is our hope that this research report will serve as a blueprint for such efforts, mobilizing stakeholders at all levels.

FOREWORD



RABIYA JAVERI AGHA

Chairperson,
National Commission for Human Rights

The right to freedom of thought, conscience, and religion is recognized in international human rights conventions as well as enshrined in the Constitution of Pakistan, 1973. The freedom to profess, practice, and propagate one's religion is a cornerstone of personal autonomy and dignity. However, the existence and perpetuation of Forced Conversion and Forced Conversion through Marriage in Pakistan is a glaring violation of such universal values and principles, which often target minor girls and women from Religious Minority Communities.

In this regard, it is important, crucial, and critical to develop intellectual discourse on Forced Conversion and Forced Conversion through Marriage with the aim to raise awareness and enhance the public consciousness on the nuances, intricacies, and complexities of this issue. I am delighted that the National Commission for Human Rights (NCHR), which is committed to promote and protect human rights, including the freedom of religion, collaborated with the Legal Aid Society (LAS), to produce the research on drivers of Forced Conversion through Marriage in Pakistan.

This report is a culmination of exhaustive research, both primary and secondary, detailed analysis, and thoughtful engagement with the issue of Forced Conversion and Forced Conversion through Marriages. It analyzes a range of contributing factors, including, social, cultural, political, economic, and legal, which drives and facilitates the practice of Forced Conversion and Forced Conversion through Marriage in Pakistan. The findings illustrates that such incidents do not occur in isolation, but are embedded in societal, structural, and systemic discrimination and marginalization. The recommendations advocate for robust mechanisms to ensure that the survivors of Forced Conversion and Forced Conversion through Marriage have access to justice, protection, and rehabilitation.

I extend my deepest appreciation and profound gratitude to the research team, who have worked with focus, dedication, and rigor on this research report. It is not only informative and though provoking but inspires action. I hope that it will be beneficial to mobilize stakeholders at local and national level and initiate meaningful dialogue to curb the issue of Forced Conversion and Forced Conversion through Marriage.

I urge and request all stakeholders, government officials, lawmakers, religious leaders, and civil society, to use this report as a tool for reform and advocacy. Let us join forces to ensure that no one is ever forced to change their faith, and that every person can exercise their right to religious freedom without fear, coercion, or discrimination.

EXECUTIVE SUMMARY

Forced Conversion through Marriage (FCM) in Pakistan is a pervasive and deeply entrenched issue, primarily affecting minor girls and women from Religious Minority Communities (RMCs). Despite legal frameworks intended to protect religious freedom, FCM persists due to a complex interplay of socio-cultural, economic, and political factors. This research aims to unravel the drivers behind FCM, focusing on how the minority status of RMCs heightens their vulnerability, and the intersection of gender, religion, and patriarchy within this context.

FCM, often referred to as ‘manipulated’ or ‘unethical’ conversions, involves forcing individuals to adopt a different religion under duress or through enticement, typically for marriage. In Pakistan, this often manifests as women and girls from non-Muslim communities converting to Islam solely for purposes of marrying Muslim men. The study reveals that FCM does not occur in isolation but is part of a broader pattern of systemic discrimination and marginalization, exacerbated by patriarchal norms, socioeconomic inequalities, and religious intolerance.

The research highlights the importance of understanding the concepts of ‘force’ and ‘consent’ in the context of FCM. Force is not limited to physical violence but includes psychological manipulation, societal expectations, and economic vulnerabilities that undermine genuine consent and well-informed decision making. The study categorizes FCM into eight scenarios: willful, for shelter, induced, fraudulent, out of greed, exploitative, under duress, and forceful, demonstrating the multifaceted nature of this issue.

Primary data collected through Key Informant Interviews (KIIs) and In-Depth Interviews (IDIs)

with survivors, combined with secondary sources, reveal the intricate fusion of socio-cultural realities, religious fanaticism, power dynamics, and control over women's bodies in cases of FCM. Perpetrators, often driven by ideological convictions such as religious obligation or patriarchal dominance justifying sexual grooming, face little to no legal, moral, or social repercussions due to weak investigations, deficient prosecutions, and support from local power structures.

The research identifies the heightened susceptibility of women and girls from RMCs to FCM, pinpointing socio-cultural, economic, and political factors that increase the risk of targeted victimization. These factors diminish their autonomy, expose them to exploitation, and perpetuate cycles of abuse, poverty, and limited access to education.

The impacts of FCM are severe, with survivors suffering from psychological trauma, physical and sexual abuse, and social stigmatization. This practice not only devastates individuals but also undermines the fabric of communal solidarity and cultural heritage within RMCs, eroding their ability to practice and propagate their beliefs. At the societal level, FCM deepens divisions, weakens the rule of law, and exacerbates human rights violations, particularly against RMCs and women.

The findings of this research are intended to inform policymakers, Non-Governmental Organizations (NGOs), and stakeholders in developing targeted interventions to protect RMCs and address this human rights violation. Comprehensive legal reforms, effective enforcement, and proactive measures are essential to uphold human rights, promote interfaith dialogue, and empower marginalized communities, ultimately working toward a more just and tolerant society in Pakistan.



“

Trapped by Faith

Minor Girls and Women from Religious Minority Communities face coercion, losing their faith and freedom to socio-cultural and political pressures.

1. INTRODUCTION

Forced Conversion through Marriage (FCM) is a pervasive and deeply concerning issue in Pakistan, manifesting as a complex interplay of socio-cultural, economic, and political factors. This phenomenon predominantly affects religious minorities, particularly Hindu and Christian women and girls, who are coerced through different mechanisms into converting to Islam and marrying Muslim men. Despite constitutional and legal frameworks intended to protect religious freedom and individual rights, the practice persists, reflecting systemic vulnerabilities and societal pressures. The State is under obligation to protect the fundamental rights of all persons including the freedom to profess, practice, and propagate religion as enshrined in Article 20 and right to equality as under Article 25, guiding by the principles of policy including the protection of the marriage i.e., legal marriage, mother, and child as under Article 35, and the legitimate rights and interests of RMCs as under Article 36 of the Constitution of the Islamic Republic of Pakistan 1973.⁸ The Pakistan Penal Code 1860 (PPC) recognises Forced Marriage (FM) as an independent crime, with additional penalties prescribed when a FM is committed with a person from the Religious Minority Communities (RMCs).⁹ However, Forced Conversion (FC), including FCM, is not a distinct criminal offence.¹⁰ Previous attempts to pass specific laws penalizing FC including FCM have faced strong resistance from religious groups and right wing circles, resulting in legislators

refusing to pass this law.¹¹ Thus, prosecuting FCM currently involves applying separate laws on abduction, kidnapping, or wrongful confinement, rather than recognizing it as one holistic crime.

FCM does not occur in isolation. The targeted victimization of women and girls from RMCs in Pakistan is the outcome of decades of institutionalized and systematic discrimination and marginalization and violence.

“Religious minorities in Pakistan live in a challenging environment. Described as woefully small and powerless, they endure a continuous sense of terror and face numerous social and political challenges. Despite constitutional guarantees of religious rights and social protection, the situation for many religious minorities has worsened over the past few decades. They remain disenfranchised and are not fully involved in Pakistan's ‘political life.’”¹²

⁸ The Pakistan Penal Code, 1860, Article 498-B

⁹ The National Commission on the Rights of the Child (NCRC). (2021, December). Policy Brief on Forced Conversion with Recommendations After Analysis of Arzoo Case, Pages 1-19, Available at: < https://ncrc.gov.pk/wp-content/uploads/2023/12/POLICY-BRIEF_NCRC__Forced_Conversion.pdf >

¹⁰ The Constitution of the Islamic Republic of Pakistan, 1973, Articles 20, 25, 35, and 36

¹¹ Tunio, Hafeez. (2023, August 23). Coerced Religious Conversions Continue in Sindh. The Express Tribune, Available at: < <https://tribune.com.pk/story/2432075/coerced-religious-conversions-continue-in-sindh> > ; The Protection of Persons against Forced Religious Conversion Bill, 2019; The Criminal Law (Protection of Minorities) Bill, 2015

¹² Ibid (n 12), Page 841

Within this context, it becomes important to delve into, and understand, the multi-faceted drivers of FCM in Pakistan. To achieve this, a comprehensive and holistic approach is essential to scrutinize the motivations of perpetrators of FCM and the situational realities of the survivors. This involves understanding why perpetrators engage in FCM, as well as why certain individuals are targeted and how these events transpire.

Literature suggests that key factors leading to the vulnerability of RMCs and their relegation to a 'minority identity' in Pakistani society include patriarchal norms, socio-economic inequalities, and religious intolerance, all of which contribute to an environment where such coercion can thrive and is excused.¹³ Patriarchal norms devalue the autonomy and rights of women, positioning them as subordinate to male authority. Socio-economic and political inequalities render marginalized communities, particularly RMCs, more vulnerable to exploitation. Additionally, religious intolerance, fueled by extremist ideologies and societal prejudices, exacerbates the targeting of minority groups.¹⁴ For RMC women, this results in being targets of double discrimination i.e. being female and a member of the RMCs. This deep-seated inequity has created an environment where these communities are persistently disadvantaged and susceptible to coercive practices like FCM.

1.1. The 'Otherization' of Religious Minorities & the Minority Identity Complex

Pakistan is a nation that is multi-religious, multi-cultural, and multi-ethnic. Muslims constitute the majority of the population, while non-Muslims account for approximately 4%. This is a stark decline from previous decades due to mass emigration resulting from institutionalised discrimination, systematic marginalization, targeted violence and increasing social intolerance. Religion is the primary determinant of citizenship and identity, with a strong emphasis on Islam in defining 'national identity'. The distinction between minority and majority religious groups is a constitutional feature in Pakistan. Article 260(3) (a) & (b) of the Constitution of Pakistan defines 'Muslims' and 'Non-Muslims' and stipulates that non-Muslims cannot be the President, the Head of the State, or the Prime Minister, the Head of the Cabinet, of the country.¹⁵ Consequently, citizenship in Pakistan is often divided into 'Muslim' and 'non-Muslim' categories, with Muslims holding greater positions of power.

This binary categorization creates an environment of 'otherization' for RMCs, where non-Muslims face systemic exclusion and diminished rights and violence. 'Otherization' involves viewing people within the same society as either part of the 'in-group' or the 'out-group', leading to an 'us vs. them' mindset that marginalises the social identity of the 'other' and further denies their rights.¹⁶ This is reflected in the government's policies across

¹³ Ackerman, Reuben. (2018). Forced Conversions and Forced Marriages in Sindh, Pakistan, CIFoRB, The University of Birmingham, Pages 1-44, Available at: <<https://www.birmingham.ac.uk/documents/college-artslaw/ptr/ciforb/forced-conversions-and-forced-marriages-in-sindh.pdf>>

¹⁴ International Federation for Human Rights (FIDH) and Human Rights Commission of Pakistan (HRCP). (2015). Minorities Under Attack: Faith-based Discrimination and Violence in Pakistan, Pages 1-23, Available at:

< https://www.fidh.org/IMG/pdf/20150224_pakistan_religious_minorities_report_en_web.pdf >

¹⁵ The Constitution of the Islamic Republic of Pakistan, 1973, Article 260(3) (a) & (b)

¹⁶ Tahir, Kashmala. and Gilani, Mashal. (2022). Knowledge, Attitudes, and Practices: Justice System's Response to Legal Issues of Religiously Marginalized Communities, The Legal Aid Society, Pages 1-42, Available at: < <https://las.org.pk/wp-content/uploads/2022/10/minorities-final-printble.pdf> >

social, administrative, legal, and political realms which often reinforce societal divisions and disenfranchise RMCs, leaving them vulnerable, unprotected, and isolated, impacting their daily lives and quality of existence.¹⁷

The majority identity complex in Pakistan of Muslims, is reinforced by historical, cultural, and political narratives, manifesting societal discrimination, marginalisation, and exclusion of non-Muslims.¹⁸ It is often accompanied by insecurity and fear of losing dominance, leading to resistance against reforms promoting equality and, in extreme cases, resulting in violence and persecution of minority communities to protect the hegemony of dominant groups. A striking example is the response to blasphemy accusations, which have often led to long-term imprisonment, vigilante mob attacks, lynching, and even murder all on the basis of unsubstantiated allegations.¹⁹ In a recent poll by the Legal Aid Society, 27.1% of respondents favoured swift public action equivalent to the death penalty without waiting for formal legal proceedings. Additionally, 18.8% supported immediate public retaliation against both the accused and their community, completely bypassing legal processes.²⁰

The minority identity of non-Muslims in Pakistan is shaped and reinforced by systemic and institutional discrimination discussed above. This is reflected in everyday experiences of discrimination, encountering barriers in building places of worship and celebrating religious festivals, being forced into menial jobs, denied equal educational opportunities, and adequate access to healthcare, economic exclusion, and being subjected to hate crimes reinforce the minority identity complex. Its impact can be seen in various ways, including a sense of inferiority, loss of cultural identity, chronic stress,²¹ and heightened vulnerability to social and economic exploitation and violence.²² These discriminatory practices are not only pervasive but are systemic in nature, further entrenching the sense of exclusion and marginalisation among RMCs.

Power dynamics within the minority-majority complex also significantly shape the experiences and vulnerabilities of RMCs, often occupying lower socio-economic positions with limited opportunities for upward mobility. Additionally, cultural hegemony that imposes majority norms, and control over key institutions like the judiciary, law enforcement, and education, further allows discriminatory practices to flourish with minimal accountability. The power imbalance restricts access to resources, enforces social exclusion, and increases vulnerability to violence and exploitation.

¹⁷ Waseem, Muhammad. and Mufti, Mariam. (2009). Religion, Politics, and Governance in Pakistan, Department of International Development, Pages 1-82, Available at: < <https://assets.publishing.service.gov.uk/media/57a08b83e5274a31e0000bd2/WP27.pdf> >

¹⁸ Rais, Rasul Baksh. (2004). Islamic Radicalism and Minorities in Pakistan, Asia Pacific Center for Security Studies, Pages 447-465, Available at: < <https://dkiapcss.edu/wp-content/uploads/2011/03/PagesfromReligiousRadicalismAndSecurityinSouthAsiach19.pdf> >

¹⁹ Gurmani, Nadir. (2024, September 12). Quetta Police Official Allegedly Kills Blasphemy Suspect in Jail, The DAWN, Available at: < <https://www.dawn.com/news/1858556> > ; Gurmani, Nadir. (2024, September 19). Umerkot Doctor Accused of Blasphemy Shot Dead in Encounter, The DAWN, Available at: < <https://www.dawn.com/news/1859836> >

²⁰ Legal Aid Society (LAS). (Forthcoming). Analysing Public Views on Reform in Blasphemy Law through a Nation-Wide Poll, Karachi, Pakistan

²¹ Khan, S. (2019). Chronic Stress and Mental Health Among Religious Minority Communities in Pakistan. Journal of Mental Health, Volume No. 28, Issue No. 3, Pages 251-258

²² Latif, Arfan., Zaka, Saira., and Ali, Shoukat. (2023). Religious Freedom and Minorities' Discrimination: A Case Study of Christians' Socio-Economic Discrimination in Pakistan, Bulletin of Business and Economics, Volume No. 12, Issue No. 1, Pages 73-80

This majority-minority power complex becomes even more intricate with the addition of intersecting layers of discrimination based on gender and religious identity. Girls and women belonging to RMCs face a unique minority identity complex shaped by these intersecting layers.²³ This complex emerges from their dual identities as both religious and gender minorities. They face systemic barriers that restrict their educational and economic opportunities, perpetuating cycles of poverty and social exclusion.²⁴ Furthermore, societal prejudices undermine their autonomy and exacerbate stereotypes, relegating them to marginalised roles in both public and private spheres. Moreover, the constant threat of Gender Based Violence (GBV), coupled with cultural norms within both communities that dictate their behaviour and appearance, further compounds their sense of insecurity and marginalization.²⁵

As noted by one minority rights activist interviewed for this research,

“Being minority, being poor, being a woman are all these things which are great weaknesses.”²⁶

This dual or triple discrimination underscores the urgent need for inclusive policies and societal reforms that uphold their rights and ensure their full participation in Pakistan's diverse social fabric.

Understanding the majority-minority complex, with a specific focus on the experiences of girls and women within RMCs in Pakistan, is crucial for promoting human rights and equality. Informed policymaking can address disparities in education, employment, and religious freedoms, while preventing violence and extremism by mitigating the risk of radicalization among marginalised groups, contributing to a more inclusive and harmonious society.

This paper aims to advance the discourse on FCM by shifting the focus from reactive responses to proactive prevention and elimination strategies. It emphasises the need for a thorough understanding of the underlying drivers of FCM within the framework of the majority-minority identity framework, highlighting the mechanisms that facilitate this practice and impact on survivors and their communities, including psychological, religious, and social effects. The paper advocates for the development of informed, targeted, and effective protective measures and policy interventions through identification of these root causes, with the ultimate goal of fostering a more just and equitable society.

²³ Tadros, Mariz. (2020, November 25). Violence and Discrimination against Women of Religious Minority Backgrounds in Pakistan. In CREID Intersections Series; Religious Inequalities and Gender, edited by Mariz Tadros, 1–308. Brighton: Institute of Development Studies, Available at: < <https://www.ids.ac.uk/publications/violence-and-discrimination-against-women-of-religious-minority-backgrounds-in-pakistan/> >

²⁴ United Nations (UN) Women and National Commission on the Status of Women (NCSW). (2023). National Report on the Status of Women in Pakistan, 2023: A Summary, Pages 1-28, Available at: < https://pakistan.unwomen.org/sites/default/files/2023-07/summary_-_nrs-w-inl_final.pdf >

²⁵ Sustainable Development Policy Institute. (2013). Searching for Security: The Rising Marginalization of Religious Communities in Pakistan, Pages 1-36, Available at: < <https://minorityrights.org/app/uploads/2023/12/mrg-searching-for-security-pakistan-report.pdf> >

²⁶ The LAS conducted the said interview on 31 May 2024



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Forced into Faith

When faith is imposed through force, it becomes a weapon of oppression, not a belief of the heart.

2. RESEARCH OBJECTIVES AND METHODOLOGY

2.1. Research Objective

The objective of this research is to investigate the underlying factors contributing to FCM in Pakistan. To achieve this, the study was guided by the following sub-questions:

1. To what degree does the minority status of RMCs in Pakistan contribute to their susceptibility to FCM, taking into account various socio-cultural, economic, and legal factors, and religious and cultural narratives that intersect within the broader societal framework?
2. What is the influence of the intersectionality of gender, religion, and patriarchy within this particular context?
3. How significant is the consideration of a child's consent within the context of FCM?

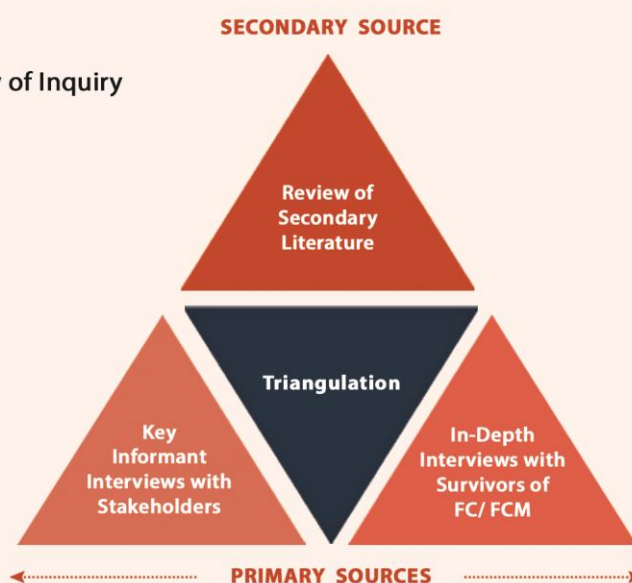
The intended outcome of this research is to offer a comprehensive understanding of the drivers behind FCM affecting RMCs in Pakistan,

particularly focusing on women and girls. By uncovering the underlying factors fuelling this phenomenon and elucidating its multifaceted nature and implications, the research aims to provide valuable insights that can inform strategies for protecting the rights and well-being of RMCs. This information will be instrumental in guiding policymakers, Non-Governmental Organizations (NGOs), and stakeholders in the development of targeted interventions aimed at addressing and mitigating the human rights violation of FC and FCM.

2.2. Research Methodology

This research utilized an entirely qualitative methodology of investigation, with both primary and secondary sources of data collected, analyzed, and triangulated to explore various aspects and nuances affecting the lives and experiences of RMCs, focusing on women and girls.

Figure 1:
Qualitative Methodology of Inquiry



Secondary sources entailed a comprehensive review of existing literature with the aim of providing a robust theoretical foundation for the study, whereas, primary data was collected through Key Informant Interviews (KIIs) with selected stakeholders who have expertise and first hand experience in dealing with cases of FCM among RMCs, as well as In-Depth Interviews (IDIs) with survivors of FCM in Pakistan.

The systematic review of the secondary literature was conducted in 3 steps. As a first step, the research team utilized contextual knowledge to identify a set of exploratory themes which were to be explored using a wide range of sources, including national and international scholarly articles, reports, government documents, and NGO publications. These themes are enumerated below:

Exploratory Themes for Review of Secondary Literature *Identifying Drivers of FC/ FCM and its Multi-Dimensional Impact on Communities in Pakistan*

- | | |
|----|---|
| 1 | Prevalence and reporting of FC in Pakistan (2021-2024) |
| 2 | Economic conditions of RMCs in Pakistan
Impact of economic vulnerability of RMC girls and women on prevalence of FCM |
| 3 | Political and civil marginalization of RMCs
Impact of political and civil marginalization of RMC girls and women on prevalence of FCM |
| 4 | Influence of 'Islamization' on building cultural preference for Islamic preferences along with increased intolerance for other religio-cultural practices |
| 5 | Majority-minority identity complex in the context of RMCs in Pakistan and resulting impact |
| 6 | Intersection and role of gender and patriarchy in instances of FCM and mis-categorization of cases of elopement and marriage of choice as FCM |
| 7 | Psychological impact of discrimination against RMCs on victims |
| 8 | Intersectionality of socio-economic status, religion, and gender in the context of FCM |
| 9 | Motivations of perpetrators of FCM |
| 10 | Vulnerability of children to predatory behaviour of men with ill-intent |
-

11	Psychological impact of violence, especially sexual violence within a criminal law context, on children
12	Role of media in glorification of forceful proliferation of religion Role of media in glorification of marriage, increasing vulnerability of young girls to FCM
13	Exploitation of rebellious age by perpetrators

Table 1: Exploratory Themes Identified for Review of Secondary Literature

Articles and reports were selected based on their relevance, credibility, and publication date. Preference was given to recent publications to ensure up-to-date information and both quantitative and qualitative studies were considered. As a second step, the gathered literature was categorized thematically to explore and extract key themes, theoretical frameworks, and gaps in the literature related to the drivers and impacts of FCM among RMCs. As the final step, findings from the literature review were synthesized to provide a foundational understanding and highlight critical areas for further exploration in the primary data collection phase. Critically, our review of secondary literature revealed that there was limited research on the intersectionality of multi-faceted drivers of FC in Pakistan, and despite availability of piecemeal research separately exploring impact of social, economic, and political factors that contribute to prevalence of violence against RMCs, there was a serious dearth of comprehensive discourse on drivers of FC and FCM. These insights informed the development of tools for the primary data collection and guided the overall data analysis strategy.

The primary data for this research was collected through two distinct response groups: KIs with selected stakeholders who were purposively sampled to provide high-level perspectives and comparative insights on potential drivers of FC

in the country, and IDIs with child survivors of FCM to understand the impact of FCM on individuals and communities, and techniques to mitigate its occurrence.

Purposive sampling was used to identify and headhunt key stakeholders from Punjab and Sindh, including lawyers, activists, community leaders, religious figures, and representatives from NGOs or human rights organizations by leveraging professional networks, recommendations, and existing contacts within the field. The selection criteria ensured a diverse representation from various sectors and efforts were made to ensure gender-balance and diversity in terms of age and religious background of the informants.

KIs were guided conversations that utilized a semi-structured interview tool with open-ended questions to allow flexibility in exploring various themes while ensuring consistency in data collection. Questions were tailored to elicit detailed narratives and insights from respondents, focusing on their experiences and views on drivers of FCM, involvement in addressing cases, challenges faced, and recommendations for interventions.

15 KIs were conducted across two provinces with highest reported prevalence of FC and FCM; Punjab and Sindh, using video conferencing, phone calls, and in-person

meetings, depending on logistical constraints and preferences of respondents. Informed consent and confidentiality protocols were followed, providing respondents with information about the study's purpose, voluntary participation, and data confidentiality. To gain a deeper understanding of the personal experiences and impacts of FCM, 3 IDIs were conducted with young female survivors of FCM (between 16-18 years of age), using a convenience-based sampling approach. This approach facilitated the inclusion of participants who were readily available and willing to share their experiences. A semi-structured interview format was used to allow for flexibility in exploring the narratives of participants while ensuring that key topics related to FCM were covered. Open-ended questions were designed to elicit detailed accounts of their experiences, focusing on the drivers, processes, and impacts of FCM. The interviews were conducted in-person in a safe and private environment, chosen to ensure the comfort and security of the respondents.

Both KIIs and IDIs were recorded with the respondents' consent, and detailed field notes were taken to capture non-verbal cues and contextual information. All interviews were transcribed verbatim to ensure accuracy and completeness of the data, and a thematic analysis approach was employed to identify recurring themes, patterns, and relationships.

Data sources were triangulated by comparing findings from the literature review with insights gained from KIIs and IDIs to enhance the validity and reliability of the study. Further, preliminary findings were shared with the respondents to verify interpretations, enhance credibility, and ensure the accuracy of the data.

2.3. Ethical Considerations

Considering the highly sensitive nature of the

research and involvement of minors in the data collection process, strict ethical protocols were followed to ensure respect, protection of legal and constitutional rights, and mental and physical well-being of the respondents.

For all secondary data, special attention was paid to the sources used and the citation of information where applicable. Only reputable national and international scholarly articles, reports, government documents, and NGO publications were used, either through public or institutional access, ensuring no breach of confidentiality. Further, proper attribution and citation were strictly followed to acknowledge sources of information, with due diligence of intellectual property rights and academic integrity. Furthermore, efforts were made to include a wide range of sources to capture diverse perspectives and avoid selective reporting.

For all primary data collected through KIIs and IDIs, the research adhered to strict ethical guidelines, ensuring voluntary participation, informed consent, confidentiality, and respect for autonomy of the respondents and the related cultural sensitivities. All participants were provided with detailed information about the study's objectives, the nature of their participation, and their rights as respondents. This included the voluntary nature of their involvement and the ability to withdraw at any time without any negative consequences. Further, consent forms detailing the study's purpose, data usage, and confidentiality measures were used to obtain informed consent from all informants prior to the commencement of the interviews.

In compliance with the 'Do Not Harm' principle, identities of all respondents were protected through the anonymization of data. In order to achieve this, recorded interviews and field notes were securely stored,

accessible only to authorized research team. Complete anonymity was guaranteed, and data was stored offline, accessible only to specific members of the program team. Pictures were taken only with the consent of the respondents.

When interviewing minors in particular, informed consent was obtained from the parents or legal guardians of the participants, explaining the purpose, procedures, potential risks, and benefits of the study. In addition to this, assent was sought from the participants themselves whereby the objectives of the study, the voluntary nature of participation, and the right to withdraw at any time were explained in age-appropriate language. Participants were asked to indicate their willingness to participate through written assent.

For both KIs and IDIs, training was conducted to ensure that the research team approaches sensitive topics with cultural awareness, sensitivity, and respect. This included being mindful of the respondents' cultural and religious contexts and avoiding questions or comments that could be perceived as intrusive or disrespectful. In particular for IDIs conducted with minors, researchers were trained to recognize and identify signs of emotional distress and were also prepared to pause or terminate the interview if the participant showed signs of significant distress.

Preliminary findings from all primary data were shared with respondents for their feedback and verification to ensure the accuracy and credibility of the data, and to allow participants opportunity to clarify or contest any interpretations.

2.4. Limitations

The research faced several limitations in both

primary and secondary data collection, which made it challenging to perform a comprehensive and in-depth analysis.

Secondary Data Collection

Challenges in gathering secondary data were largely due to the scarcity of relevant and updated local literature. Existing studies are often limited in their analytical depth, lacking intersectional approaches and repeating similar data, without offering fresh insights. Notably, no study comprehensively explored the socio-cultural, religious, and legal contexts of FCM or discussed its social, cultural, and large-scale psychological impacts on survivors, their families, and communities. This gap in local research hindered the development of a nuanced understanding of FCM drivers, making it difficult to contextualize findings within Pakistan's landscape.

Moreover, there was a significant lack of detailed research on the overall impacts of FCM on women and girls from RMCs. While some international literature touches on trauma and the socio-economic and psychological effects of FMs, there is a critical absence of local studies that explore these impacts within Pakistan's context. This limitation hampers the ability to fully understand the multifaceted consequences of FCM, including its effects on survivor's mental health, social standing, and economic well-being, ultimately restricting the development of tailored interventions.

Additionally, the research struggled with a lack of comprehensive data on the motivations of FCM perpetrators. Understanding these motivations, whether psychological, ideological, religious, or socio-economic, is crucial for addressing the root causes of FCM. However, the existing literature focuses predominantly on survivors with insufficient attention to the factors driving the

perpetrators. This gap significantly impedes the development of targeted preventive measures.

Another key limitation was the absence of authentic and comprehensive statistical data, which constrained the scope of the analysis. The lack of reliable quantitative data made it difficult to draw definitive conclusions or generalize findings across the broader population. As a result, the research relied heavily on qualitative insights, which, while valuable, cannot fully replace the depth and precision provided by robust numerical data. Consequently, the findings may lack the full breadth and depth needed to comprehensively address FCM in Pakistan.

Primary Data Collection

In primary data collection, several challenges compounded the research limitations. Respondents who participated in interviews via video conferencing were often hesitant to share sensitive information due to fear of repercussions or the emotional sensitivity of the subject matter. This reluctance affected the depth of data collected, impacting the overall analysis and the ability to draw robust conclusions.

Logistical and time constraints also prevented the inclusion of some key respondents who could have provided critical insights, particularly renowned legal experts and activists. The unavailability of Criminal Justice Sector (CJS) Actors resulted in an imbalance in perspectives, with greater emphasis placed on the views of faith leaders and civil society activists.

Finally, the research faced difficulties in accessing respondents from different religious communities. Notably, fewer Hindu participants were interviewed compared to Christians, primarily due to their unavailability. This disparity in representation may skew the findings, limiting the ability to generalise the outcomes across all religious minority groups affected by FCM in Pakistan.



“

Bound by Faith

Forced Conversion through Marriage is a highly contested and debated issue in Pakistan, characterized by varied views and perceptions regarding its existence, prevalence, and impact.

3. WHAT IS FORCED CONVERSION THROUGH MARRIAGE IN PAKISTAN?

FC, also referred to as ‘manipulated’ and ‘unethical’ conversions, is the term explaining the involuntary adoption of a different religion under enticement, duress, or coercion.²⁷ There are various examples of how FC takes place in Pakistan, one of which is FCM, where a person, usually a girl or woman belonging to a non-Muslim community in Pakistan, involuntarily changes their religion to Islam and instantly marries a Muslim man.

FCM is a highly contested and hotly debated topic in Pakistan with varied views and perceptions on its existence, prevalence, and impact. Advocates for the recognition of FCM as a significant and prominent issue emphasize that the practice targets under-age girls from RMCs, particularly those from the Christian and Hindu communities.²⁸ They assert that implications are severe, leading to increased insecurity, restricted freedom, and early marriages, which further perpetuate cycles of abuse, poverty, and limited access to education.²⁹ This not only affects the survivors but also exacerbates the marginalisation of RMCs as a whole, undermining social cohesion and human rights.³⁰

The lack of accurate, reliable, and validated statistics on the incidence of FCM, forms the basis of the argument put forth by those who challenge the substantive existence of FCM. They assert that the majority cases of FCMs are actually voluntary conversions and consensual marriages.³¹ This reality, they argue, is obscured or overshadowed by patriarchal and socio-political narratives that reject love marriages, particularly interfaith unions and marriages initiated by women. Consequently, these consensual marriages are often misrepresented as FCMs to conform to these prevailing societal and political discourses. They further contend that this issue is politicized and weaponized by secular, and left-wing political actors who aim to advance their one-sided agenda.³² They argue that the propagation of such an agenda, is often characterised by a refusal to acknowledge the voluntary conversion of girls and women to Islam and is intended to

“Malign the religious clerics, Islam, Pakistan, and Muslims.”³³

²⁷ Jacob, Peter. (2019, November 29). Silence of the Lamb II: A Working Paper on Forced Conversions, Centre for Social Justice, Pages 1-32, Available at: < [https://csjpak.org/pdf/Working%20Paper%20on%20Forced%20Conversions%20\(English\).pdf](https://csjpak.org/pdf/Working%20Paper%20on%20Forced%20Conversions%20(English).pdf) >

²⁸ Rasool, Aisha., and Abdullah Kamran. (2022). Forced Conversion of Minorities in Pakistan and Legal Challenges, Federal Law Journal, Volume No. 1, Issue No. 1, Pages 83-102

²⁹ Schaflechner, Jorgen. (2018). Hindus in Pakistan: A Long History of Forced Conversions. South Asia, Journal of South Asian Studies, Volume No. 41, Issue No. 1, Pages 233-256

³⁰ Khan. Sheharyar., Mallick, Ayyaz., and Ali, Khadija. (2022). Resilience, Community Security, and Social Cohesion Through Effective Women's Leadership: A UN Women Research Study, United Nations (UN) Women, Pages 1-89, Available at: < <https://asiapacific.unwomen.org/sites/default/files/2022-01/pk-UN-WOMEN-RESEARCH-STUDY.pdf> >

³¹ Hussain, Ghulam. (2020, October 20). Forced Conversions or Faith Conversions: Rhetoric and Reality, Institute of Policy Studies, Pages 1-82, Available at: < <https://www.ips.org.pk/wp-content/uploads/2020/10/13-Faith-Conversions-or-Forced-Conversions-final-1.pdf> >

³² Ibid (n 35) Page 71

³³ Hussain, Ghulam. (2021). Religious Conversions in Pakistan: Empirical Evidence from Sindh, Policy Perspectives, Volume No. 18, Issue No. 1, Pages 5-24

In the absence of precise official statistics on FCM, data collected by civil society and human rights organizations through media reports, reported incidents, and information received from lawyers, activists, and minority religious institutions, vary in methodologies and time frames, contributing to this inconsistency.³⁴ For instance, the People's Commission for Minorities Rights (PCMR) and the Centre for Social Justice (CSJ) reported a 177% increase in FC cases between 2020 and 2021³⁵ while the Movement of Solidarity and Peace (MSP) estimates that approximately 1,000 underage girls are converted to Islam each year in Pakistan.³⁶

Without specific laws addressing FCM, court cases often involve charges of rape, kidnapping, abduction, wrongful confinement, and child marriage, further making it difficult to ascertain official disaggregates of reported cases involving FCM. This lack of official data disaggregation fuels skepticism among those who believe the issue is exaggerated and those who are sympathetic to the plight of the survivors.

Despite arguments to the contrary, the existence of FC and FCM is undeniable even if the numbers are not accurately tabulated or reported.³⁷ The numerous existence of first-hand stories and accounts of girls and women who have been a survivor of FCM along with factual evidence from lawyers, activists, religious leaders and National Rights Commissions (NRCs) lend weight to the argument that there exists a long-standing history of the occurrences of FCM in Pakistan.

FCM Cases Reported to the National Commission on Human Rights

The National Commission of Human Rights (NCHR) has taken various Suo Motu notices of FCM cases, in which minor girls and women were abducted, forced to convert to Islam, and married off to their abductors. However, relief has been provided to the survivors and their families due to the intervention of the NCHR. The details of the some of the cases are as follows:

1. A young Christian woman was abducted and made to marry a Muslim man after he forced her to sign and place her thumbprint on a marriage contract. Seeking to annul the marriage, the survivor filed a petition in the Bahawalpur family courts and had to seek refuge in Bahawalpur amid threats to their lives. The NCHR timely intervened in the case and issued a notice to DPO Bahawalpur for submission of a comprehensive report, which resulted in protection being provided to the survivor and her family by the police and with warnings given to the accused to stop future threats to the survivor and family.³⁸

³⁴ Ibid (n 31)

³⁵ Chaudhry, Kamran. (2021, October 18). Pakistan Sees Record Leap in Forced Conversions, Union of Catholic Asian (UCA) News, Available at: < <https://www.ucanews.com/news/pakistan-sees-record-leap-in-forced-conversions/94582> >

³⁶ Movement for Solidarity and Peace (MSP). (2014, April). Forced Marriages and Forced Conversions in the Christian Community of Pakistan, Pages 1-34, Available at: < https://d3n8a8pro7vhmx.cloudfront.net/msp/pages/162/attachments/original/1396724215/MSP_Report_-_Forced_Marriages_and_Conversions_of_Christian_Women_in_Pakistan.pdf?1396724215 >

³⁷ Ibid (n 31) Page 7

³⁸ Niaz, Aleena Annual Report: December 2021 - December 2022, National Commission for Human Rights (NCHR), Pages 1-109, Available at: < <https://www.nchr.gov.pk/wp-content/uploads/2023/06/Annual-Report-2022.pdf> >

2. In 2024, local and national newspapers reported about the alleged abduction, religious conversion, and forced marriage of an 11-years-old Christian girl from Sheikhpura. Upon intimation of the case, the NCHR intervened and issued notices to the concerned police officials. They submitted the report of the case, which stated that the minor girl has been returned to her parents.³⁹

Figure 2: FCM Cases Reported to the National Commission for Human Rights

This has been further attested through our interviews with multiple minority rights activists, lawyers, and political actors who all quoted examples of confirmed FCM cases in which they were personally involved. As noted by one minority rights activist interviewed in Karachi,

“...the law allows you to marry a Christian. Why would you convert that girl to Islam? That itself substantiates that this is a case of FC. When they come back, they haven't converted.”⁴⁰

Cases⁴¹ such as Charlotte Javed and Bhambo Mai in Punjab, and Arzoo Raja and Mehak

Kumari in Sindh, illustrate that not only are FCM cases occurring regularly, but also indicate that such cases follow certain patterns: the majority of survivors are young girls from Punjab and Sindh, belonging to lower economic class families facing poverty and deprivation. These girls are often approached by the perpetrator and groomed for a period of time, and then coerced, manipulated, or compelled under duress to leave their homes, after which they are abducted, forcefully married, and purportedly converted. It is also common for powerful religious clerics and institutions to be involved in these cases.⁴²

As reported by several organisations and groups, “...typically, the *modus operandi*, especially in Sindh, often follows largely consistent patterns. Conversion of a girl from a minority faith often begins with her abduction. This is subsequently followed by a claim that the girl has converted to Islam, married a Muslim and does not wish to return to her family. Protests or cases lodged by the girl's family might lead to a court summoning the girl to ascertain whether she has converted of her own volition. Members of RMCs have stated that in such cases, the courts seldom decide matters of custody of the abducted girl in the family's favour, even if the girl in question is a minor. They have also stated that the courts that are asked to adjudicate on such matters often come under immense pressure, in the form of courtrooms packed with zealots.”⁴³

In all of the cases examined, the alleged conversion of faith of a girl from a RMC precedes her being wed off to a Muslim man. The time difference between the alleged conversion of faith and the marriage may only

³⁹ Data Received from National Commission for Human Rights (NCHR) on the Status of Complaints Details of NCHR Regional Office, Punjab W.E.F. 01 December 2021 to 31 July 2024

⁴⁰ The LAS conducted the said interviews on 01 June 2024, 06 June 2024, 08 June 2024, 11 June 2024, and 12 June 2024

⁴¹ Ibid (n 31) Page 6

⁴² Javaid, Maham. (2016, 18 August). State of Fear, The Herald (Pakistan), Available at: < <https://herald.dawn.com/news/1153061> >

⁴³ Najam u Din. (2019, December). Challenges in Exercising Religious Freedom in Pakistan, Centre for Social Justice, Pages 1-37, Available at: < [https://www.csjpak.org/pdf/Study%20Challenges%20in%20Exercising%20Religious%20Freedom%20in%20Pakistan%20\(CSJ\).pdf](https://www.csjpak.org/pdf/Study%20Challenges%20in%20Exercising%20Religious%20Freedom%20in%20Pakistan%20(CSJ).pdf) >

be a moment and the actions undertaken constituting the transaction may also only be limited to attaining thumb impressions of the abductee on blank sheets of paper, but the conversion necessarily comes before the marriage. On close inspection to understand why this is so, it emanates that the primary reason is to evade legal provisions, and their consequence, such as Section 4 of the Christian Marriages Act, 1872, which recognizes an inter-faith marital union provided that the marriage shall be solemnised in accordance with the Act, 1872, ruling out marriage ceremony by a Muslim cleric - any marriage, where either of the spouses is a Christian, if conducted in contravention of this provision shall be void.⁴⁴ Thus, the modus operandi and key players in FCM are more or less the same.

Particularly where the victim is a minor, the purpose of conversion of faith certificate is not just to give a declaration of faith but also serve as a document certifying age as the issuing authority often mentions the age of such victim girls to be 18 or above on mere oral testimony of the abductor. This certificate mentions the age of the survivor girl child to be 18 or above and the same is then quoted in the Affidavit of Free Will prepared next and the eventual Nikkahnama, in an attempt to evade the provisions of child marriage restraint laws as applicable in Punjab and Sindh.⁴⁵

The presence of FCM is undeniable. However, the challenge lies in systematically tabulating data on such cases due to the absence of specific legislation to guide data collection and the reliance on potentially unreliable case reports. It is crucial for the government and criminal justice system to establish effective

methods and mechanisms for documenting such cases. This will necessitate modifications to data recording and analysis practices within each department. Despite the difficulties, it is imperative to address this issue as the need for accurate data is paramount. While the high incidence of cases is not required to highlight the severity of this crime, where even a few cases can instil fear, the collection of authentic data is essential for comprehending the scope of the problem and pursuing a solution-oriented approach and programming from the State and CJS Actors.

3.1. Components of Forced Conversion through Marriage

To commit an FCM, two specific violative acts must be carried out and proven: (1) coercion to convert religion and (2) coercion to marry. Both must occur together to constitute FCM.

It is crucial to break down the key concepts of 'force' and 'consent' in relation to conversion and marriage to truly understand how this violation is perpetrated. This is necessary not only for improved general comprehension but also for effective legal responses and informed policy interventions. We can better understand the complexities of FCM and develop appropriate measures to address and prevent it through dissection of such concepts.

3.1.1. Understanding 'Force' in Forced Marriages and Forced Conversion

The common narrative and discourse surrounding FCM typically centres on the traditional and narrower, and often restricted to the physical, understanding of 'force' which includes abduction, physical violence, threats

⁴⁴ The Christian Marriage Act, 1872, Section 4

⁴⁵ The Child Marriage Restraint Act, 1929, Section 4; The Sindh Child Marriage Restraint Act, 2013, Section 3

of harm to the survivor or their family members, or wrongful confinement. For example, in one of the cases we studied, the survivor, a minor girl from the Christian community, was deceitfully taken to the perpetrators' house by her aunt, wrongfully confined, and forcefully married under the threat of harm to her younger brother.⁴⁶

In legal contexts, proving such physical coercion beyond reasonable doubt is crucial. Consequently, the presentation of the *alleged* consent of the survivor in court cases e.g. she signed or put her thumb impression on the Nikahnama, can often result in acquittal, as it is perceived that no such force was employed.⁴⁷ However, this narrow focus on overt physical coercion overlooks more subtle forms of psychological pressure, societal expectations, and economic vulnerabilities that can also undermine genuine consent in cases of FC.⁴⁸

Based on an analysis of FCM cases, the Centre for Legal Aid, Assistance, and Settlement (CLAAS) identified 8 categories or reasonings for conversions,⁴⁹ reflecting the more complex dynamics and different scenarios falling within the scope of FCM. Each category highlights the different motivations behind religious conversions and it is crucial to understand the nuances of each for the identification of FC and FCM, and development of effective interventions and policies for their prevention and elimination.

1. Wilful

In a 'wilful' conversion, an individual freely chooses to convert to another religion, usually motivated by personal belief or a genuine relationship. This is based on informed consent and reflects an individual's autonomy and



Figure 3: CLASS' 8 Categories, or Drivers, of Religious Conversion

⁴⁶ The LAS conducted the said interview on 03 June 2024

⁴⁷ Ibid (n 9) Page 10

⁴⁸ Human Rights Commission of Pakistan (HRCP). (2023). A Breach of Faith: Freedom of Religion or Belief in 2021-22, Pages 1-24, Available at: < <https://hrp-web.org/hrpweb/wp-content/uploads/2020/09/2023-A-breach-of-faith-freedom-of-religion-or-belief-in-2021-22.pdf> >

⁴⁹ Anthony, Nadeem. (2011). Centre for Legal Aid Assistance and Settlement (CLAAS): Annual Report 2011, CLAAS - Pakistan

freedom of choice. This is not a case of FCM.

2. For Shelter

Conversions ‘for shelter’ happen when vulnerable individuals, particularly women or girls, seek protection from poverty, violence, or other dire circumstances. In such cases, the conversion is more about survival than genuine religious conviction, as individuals feel they have no other option for safety or stability.

3. Induced

In ‘induced’ conversions, individuals are persuaded through promises of a better life, financial stability, or other incentives. While not overtly forceful, these promises create a situation where the individual feels compelled to convert, often without fully understanding the implications.

4. Fraudulent

‘Fraudulent’ conversions occur when deceit is involved. Individuals may be misled about the nature of the marriage or the conversion, with promises that are never intended to be fulfilled. This deceit undermines the autonomy of the individual and can lead to exploitation.

5. Out of Greed

Conversions ‘for greed’ involve the desire for material gain by the perpetrator. This could include access to the survivor’s property, inheritance, or dowry. Marriage and conversion are used as tools to exploit the survivor’s resources for financial benefit.

6. Exploitative

‘Exploitative’ conversions involve taking advantage of the individual’s vulnerabilities, such as poverty, lack of education, or social

marginalization. The survivor is manipulated into conversion and marriage, often with the intent of benefiting the perpetrator, whether through labour, sexual exploitation, or social status.

7. Under Threat or Duress

Conversions ‘under threat or duress’ occur when individuals are subjected to physical or emotional threats, such as harm to themselves or their families. The survivor may feel they have no choice but to convert to avoid the threatened consequences, stripping away genuine consent. These can also include cases of blackmail.

8. Forceful

‘Forceful’ conversions involve overt physical or psychological coercion. The survivor is compelled to convert against their will, often through violence or severe intimidation. This is the most extreme form of coercion, leaving the survivor with no autonomy in their religious or marital decisions.

A broader interpretation of the concepts of ‘force’ and ‘coercion’ and their application reveals the inadequacies of the current simplified discourse on FCM. Legal proceedings often focus narrowly on physical force, ignoring psychological manipulation, societal expectations, and economic vulnerabilities, which can severely undermine genuine consent.

A broader interpretation of the concepts of ‘force’ and ‘coercion’ and their application reveals the inadequacies of the current simplified discourse on FCM. Legal proceedings often focus narrowly on physical force, ignoring psychological manipulation, societal expectations, and economic vulnerabilities, which can severely undermine genuine consent.

Further, it is crucial to identify non-violent tactics that are used to perpetuate FCM. For survivors, the ordeal is not just a violation of their rights but a profound upheaval that fractures their sense of safety and identity. Deceived by false promises of security or economic stability, these vulnerable individuals often find themselves trapped in situations where coercion and manipulation dictate their every move. Isolated from their support systems and stripped of their autonomy, they endure not only the immediate trauma of forced unions but also the long-term consequences of severed educational opportunities and economic prospects.

For example, one Key Informant, practicing as an advocate in Sindh and specializing in cases of FC and FCM, observed that videos of girls are used to blackmail them into converting and marrying.⁵⁰

The shame and threat associated with these videos is greater for the survivors than the marriage and conversion itself. The same was highlighted by another survivor of FCM interviewed for this research who stated that her concern about her father's reaction and societal reintegration overshadowed the trauma of the event at the time.⁵¹ One informant noted that the concern for social reintegration if the girls wish to return to their own communities is valid, since despite being abducted, many girls cannot return to their families due to societal unacceptance, and thus end up living in private shelter homes.⁵²

Some of these non-violent tactics used for perpetuation of FCM are identified below:



Figure 4: Non-Violent Tactics Used to Perpetuate FCM

⁵⁰ The LAS conducted the said interview on 11 June 2024

⁵¹ The LAS conducted the said interview on 03 June 2024

⁵² The LAS conducted the said interview on 08 June 2024

The incorporation of these nuances into mainstream discourse is essential for recognizing the multifaceted nature of coercion and to gather more comprehensive legal and social responses, ensuring that consent is informed and voluntary.

Addressing these challenges requires not only legal protections and robust support structures, but a societal commitment to challenging harmful practices and advocating for the rights and dignity of those affected.

3.1.2. Understanding Consent

“Consent turns a rape into love-making, a kidnapping into a Sunday drive, a battery into a football tackle, a theft into a gift, and a trespass into a dinner party.”⁵³

Consent and use of force represent two opposing concepts that are crucial in determining the legality and ethical implications of FCM in Pakistan. Consent is defined as a voluntary and informed agreement, given without coercion, deception, or undue influence, to enter into a marriage and, if applicable, to convert to another religion. Within the legal framework, genuine consent implies that the person understands the nature and consequences of their decision and makes a free choice without any form of

force, coercion, threat, manipulation, or undue influence including psychological manipulation or socio-economic pressures.⁵⁴

In the case of FCM, consent must be established for two actions:

- > Conversion of Religion
- > Marriage

To ascertain consent, the following key elements need to be established:⁵⁵

1. **Voluntariness:** The individual's agreement to marry and/or convert must be given freely, without any form of force, coercion, threat, or pressure.
2. **Informed:** The individual must have full knowledge and understanding of the implications and consequences of both the marriage and the religious conversion.
3. **Capacity:** The individual must possess the mental and legal capacity to make such decisions, which includes being of a certain age as defined by law and having the cognitive ability to comprehend the situation.

Consent to Marriage

In Pakistani jurisprudence, while consent to marriage is distinct from other forms of consent, such as common or mutual consent, it holds significant legal weight. The Federal Shariat Court (FSC) has articulated that marriage consent is declaratory, specific, and carries profound implications across various

⁵³ Hurd, Heidi M. (2005, January). Blaming the Victim: A Response to the Proposal that Criminal Law Recognize a General Defense of Contributory Responsibility, Buffalo Criminal Law Review, Volume No. 8, Issue No. 2, Pages 503-522

⁵⁴ Bergelson, Vera. (2014). The Meaning of Consent, Ohio State Journal of Criminal Law, Volume No. 12, Issue No. 1, Pages 171-180

⁵⁵ Joamets, Kristi. (2012). Marriage Capacity, Social Values and Law-Making Process, International and Comparative Law Review, Volume No. 12, Issue No. 1, Pages 103-121; Hussain, Bilal., Abbas, Hafiz Ghulam., and Hussain, Khalid. (2022, March 24). Legal Competency for Marriage: In an Islamic and Pakistan Law Perspective, Al-Aijaz Research Journal of Islamic Studies & Humanities, Volume No. 6, Issue No. 1, Pages 12-24

legal domains, including inheritance.⁵⁶ It necessitates the ability to exercise free choice, legal capacity, extent of free availability of possible options to choose from, environment of freedom and the availability of counsel or support from guardians. Notably, legal precedents underscore the importance of establishing that consent was freely given, particularly in cases where external factors may have influenced the decision-making process, as seen in landmark judgement of the Supreme Court where the voluntary nature of marriages was questioned due to circumstances such as the absence of familial or community presence during the ceremony.⁵⁷

Legal Capacity: The Question of Age of Marriage & Consent to Marriage

Despite legal age limitations, courts continue to give contradictory judgments on a girl's/women's capacity to enter into marriage under Muslim Personal Law (MPL). Several judgments assert the conservative Islamic interpretation of the concept of age of puberty i.e. a girl's attainment of physical puberty is sufficient for her to be deemed an adult for marriage under MPL. In direct conflict to this, other judgements⁵⁸ assert puberty is a physical milestone and does not equate to the mental and psychological maturity required to understand the responsibilities of marriage. Legal competence for marriage should be based on chronological age, not physical development. Allowing a child under 18 to marry would undermine child protection laws.

Another aspect to be considered is that the law recognizes any act, including but not limited to

employing physical force, by which a minor girl under the age of sixteen (16) years may be taken away from her parents, to be the crime of 'kidnapping' entailing penal consequences.⁶³ This means that no amount of assent of a minor girl under the set age, to accompany her kidnapper can be considered valid 'consent'. This also means that the traditional concept of force need not be available to invalidate consent, but rather the very limitations of age of the minor girl invalidate any alleged act of her consent in the course of the transaction of marriage. However, despite these legal provisions, conflicting judicial precedents often see the alleged 'consent' of a survivor being deemed valid during trial.

This was highlighted in the interviews conducted with both survivors of FCM as well as the Key Informants. One survivor of FCM noted her complete ignorance as to what she was signing at the time of her marriage. She had agreed to go with her perpetrator because he had offered to buy her snacks – something he had done before. Instead, he took her to court and she was asked to put her finger print on a few documents. She noted that due to lack of knowledge and fear, she did what they asked. However, she did not give her consent. In fact, she was not even aware that she was getting married or converting as a result of her putting down her finger prints.⁶⁰ In another case revealed by a minority rights activist interviewed for this research, a minor girl agreed to marriage because she thought it would mean

"nice clothes and vacations, just like what is shown in movies and dramas"⁶¹

⁵⁶ Muhammad Aslam vs. The State, PCrLJ 11 (2012)

⁵⁷ Matloob Hussain vs. Shahida, PLD Supreme Court (SC) 489 (2006)

⁵⁸ Mumtaz Bibi vs. Qasim, PLD Islamabad High Court (IHC) 228 (2022)

⁵⁹ The Pakistan Penal Code, 1860, Section 361

⁶⁰ The LAS conducted the said interview on 03 June 2024

⁶¹ The LAS conducted the said interview on 08 June 2024

without any real understanding of the implications. Neither of them knew and understood the physical aspects of marriage and the impact of sexual intercourse. In fact, as one of them noted, they did not even know what sexual intercourse was until they were raped as a result of their 'marriage'⁶²

In a recent case, the Islamabad High Court (IHC) deliberated that a minor, i.e., a child below the age of 18, lacks the legal capacity to provide informed consent for contracts, including marriage. This extends to female children, for whom physical signs of puberty do not equate to legal competence to consent to marriage. The country's legal framework, including the Muslim Family Laws Ordinance, 1961, and the Islamabad Capital Territory Child Protection Act, 2018, expressly declares any marriage involving a child under 18 as void. Furthermore, children under 18 are considered dependents, and the government holds a paramount obligation to safeguard their rights, particularly from exploitation or harm, including premature marriages. Sections 375 and 377A of the PPC, 1860, unequivocally prohibit all forms of sexual conduct with children, including within the context of marriage.⁶³ This legal stance emphasises that children cannot legally consent to engage in any sexual activity, and parents or guardians cannot contract them out for such purposes. Pakistan's legal provisions ensure that there are no exceptions for conduct amounting to rape or sexual abuse, even if purportedly justified by a marriage contract involving a child under 18.⁶⁴

Unfortunately, the inconsistency in the legal age of marriage across provinces, combined

with the continued reliance on puberty as a threshold, partially stemming from the archaic and contradictory provision in Section 2 of the Majority Act, 1875 which recognizes capacity of a minor to contract marriage, creates loopholes that enable perpetrators of FCM to evade accountability under the law.

Consent to Religious Conversion

Consenting to religious conversions is a complex process involving significant changes in beliefs, behaviour, and social relationships. Lewis R. Rambo and Charles E. Farhadian outlined seven key issues which should be assessed while studying religious conversion: personal narrative continuity, convert agency, motivation, complexity, material aspects, post-conversion life, and historical context.⁶⁵

In cases of conversion of faith, ascertaining consent is essential to ensure that the conversion process respects the individual's autonomy and religious freedom, aligning with principles of human rights and personal choice.⁶⁶ Thus, true and informed consent requires a voluntary decision made by an individual after being fully informed about the beliefs, practices, and implications of adopting a new religious identity. Informed consent requires that individuals are provided with adequate information about the religious doctrines, rituals, and community expectations associated with the new faith, including understanding the potential personal, familial, social, and cultural impacts of conversion. There is no official 'conversion process' in Pakistan, leading to ad hoc practices.

⁶² The LAS conducted the said interview on 06 June 2024

⁶³ The Pakistan Penal Code, 1860, Sections 375 and 377A

⁶⁴ The Sindh Child Marriage Restraint Act, 2013, Section 2; Azka Wahid vs. Province of Punjab, Lahore High Court (LHC) 1392 (2024)

⁶⁵ Rambo, Lewis R., and Farhadian, Charles E. (2014, April 3). The Oxford Handbook of Religious Conversion, Oxford University Press

⁶⁶ Thomson, Diana V. and Toney, Kayla A. (2023, May 14). Sacred Spheres: Religious Autonomy as an International Human Right, Catholic University Law Review, Volume No. 72, Issue No. 2, Pages 151-192

“Many religious institutions, local mosques, and seminaries routinely issue certificates of conversion beyond the scope of any law. Religious zeal of the aforementioned institutions fails them to assess the element of coercion in the conversion, confirm the age of the so-called bride and presence of a crime.”⁶⁷

Further, multiple activists and religious figures interviewed for this research also noted that often the person doing the conversion is not aware of Islam themselves and is not a cleric. They opined that establishing official conversion centres and certificates could counter the ad hoc practices.

Investigators should conduct private interviews with the alleged survivor to understand their experiences, looking for consistency and signs of coercion. Further, testimonies should be gathered from family, friends, and community members to provide additional context. Physical evidence, such as medical examinations for abuse, and psychological assessments for trauma, are crucial. Reviewing communications between the survivor and accused may reveal threats or manipulation. Investigating financial and social dependencies can indicate undue influence, while understanding community dynamics can uncover societal pressures. Analysing legal documents for signs of duress and previous legal actions for coercive behaviour is essential. Observing the consistency of the survivor’s religious practices and consulting religious and cultural experts can provide deeper insights, ensuring a thorough assessment of whether the conversion was truly voluntary.



Figure 5: Investigation Techniques to Ascertain Consent in FC and FCM Cases

⁶⁷ Ibid (n 31) Page 8

These considerations highlight the complexities involved in determining the validity of consent in FCM cases, underscoring the need for robust legal frameworks and interventions to protect vulnerable individuals from exploitation and uphold their fundamental rights in matters of marriage and religious affiliation.

3.1.3. Recognizing Differences: Consensual vs. Non-Consensual/Forced Marriage and Conversion

In Pakistan, it is common practice that upon reporting of a case of alleged FCM, the counter-argument is that it is in fact a consensual marriage and not a case of FC/FCM.

It is important at the onset to distinguish between marriages between two consenting adults where one partner takes the informed

decision to convert to the other’s religion and FCM, where the individual, often a minor girl, is coerced or pressured into changing their religion, typically as a prerequisite for marriage. In the former, both parties enter the marriage freely, and the decision to convert is made without coercion, pressure, or manipulation. The individual has the autonomy to explore and embrace a new faith as part of their personal beliefs or relationship dynamics. In the latter, this process is not based on genuine consent, and the individual may be under duress, facing threats, experiencing manipulation or simply lack the maturity and capacity to understand the implications and consequences of the act. The conversion is often used to legitimize an otherwise exploitative situation, and the survivor’s autonomy is disregarded.

Key Differences between Marriage between Consenting Adults & Faith Conversion by Informed Choice and Forced Conversion through Marriage	
Marriage between Consenting Adults & Faith Conversion by Informed Choice	Forced Conversion through Marriage
Consent	
Base on informed, voluntary decision-making	Lack of genuine consent; involves coercion
Autonomy	
Individual maintains control over their choices	Survivor's autonomy is compromised
Motivation	
Motivated by personal beliefs or relationship dynamics	Often driven by external pressures or societal norms
Legal and Ethical Implications	
Recognized as a legitimate personal choice	Raises significant human rights concerns; often illegal

Table 2: Key Differences Between Consensual and Non-Consensual Marriage Between Adults of Different Faiths



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Coerced into Faith

In Pakistan, Forced Conversion through Marriage reflects a web of religious fanaticism, power, and control over women's bodies and lives.

4. DRIVERS OF FORCED CONVERSION THROUGH MARRIAGE: MOTIVATIONS & TARGETED VICTIMIZATION

In Pakistan, the motivations behind perpetrators of FCM reveal a complex nexus of socio-cultural realities, religious fanaticism, power dynamics, and control over women's bodies and sexuality. Perpetrators' motives include religious zeal, sexual gratification, social dominance, and control, all of which violate survivors' autonomy and dignity. In cases of FCM, perpetrators use manipulation, exploitation, and cruelty to coerce minor girls and women from RMCs into abandoning their faith. Some see conversion as a religious obligation, while others exploit socio-economic vulnerabilities, offering financial incentives. Often from powerful or connected families, local elites, and gangs, perpetrators leverage their influence with support from religious and local leaders to pressure marginalized individuals into Islam and evade themselves from legal repercussions.

Understanding the motivations of perpetrators of FCM through marriage is crucial for creating effective interventions and policies. It helps develop targeted legal frameworks, improves survivor support services, and informs community education to enhance protection. Additionally, this knowledge aids law enforcement in better investigation and prosecution, ensures justice, and strengthens international advocacy efforts. Ultimately, comprehending these motivations is essential for dismantling harmful power structures and preventing an appropriate response to incidents of FCM.

Through this research, we have identified different motivations driving perpetrators to commit FCM of minor girls and women and the vulnerabilities that increase the victimization of women from RMCs. The structure of these drivers is outlined as follows:



Figure 6 (Part 1): Drivers of FCM



Figure 6 (Part 2): Drivers of FCM

4.1. Legal, Social, and Moral Impunity: Motivations of Perpetrators of FCM

4.1.1. Religious Duty and Ideological Convictions

The perpetrators of FCM in Pakistan often frame their actions in distinctly religious terms to gain support from conservative religious circles. This narrative is crafted to align with religious duty and to portray the conversion of non-Muslims, particularly minor girls and women from RMCs, as voluntary expressions of faith rather than coercion of any sort.

Perpetrators believe or purport to believe that it is their duty to convert someone who allegedly wishes to embrace Islam.⁶⁸

The religious predators place their reliance on different verses of the Quran and Hadith to facilitate the process of conversion. A member of the Center for Social Justice in Lahore, Punjab, observed:

*"Due to religious identity, when these cases happen, the majority favours it as if some very good deed is being done."*⁷⁰

However, Justice Tariq Saleem Shaikh in his seminal judgement, *Nasira vs. Judicial Magistrate* (2019 LHC 4414) quoted Hafiz Ismail Bin Kathir, a great historian, exegete, and scholar, to denounce the notion that Islam is in favor of FCM, which is reproduced as follows:

*They "believe that converting someone to Islam entails heavenly reward, which contributes to the lethargy of government and police when it comes to cases of FC in Pakistan."*⁶⁹

"Do not force anyone to become Muslim, for Islam is plain and clear, and its proofs and evidence are plain and clear. Therefore, there is no need to force anyone to embrace Islam. Muslims have a collective responsibility to share the message of

⁶⁸ Schaflechner, Jurgen. (2018, September 18). Forced Conversion of Hindu Women to Islam in Pakistan: Another Perspective, Available at: < <https://sharepoint.uclouvain.be/sites/cismodoc/Articles/J.%20Schaflechner,%20%E2%80%98Forced%20conversions%E2%80%99%20of%20Hindu%20women%20to%20Islam%20-%20another%20perspective%20,%20The%20Conversation,%2018%20sept.%2018.pdf> >

⁶⁹ Ibid (n 31), Page 7

⁷⁰ The LAS conducted the said interview on 06 June 2024

Islam, but the normative way to do this has been clearly described in the Qurān, itself i.e. Invite all to the way of your Lord with wisdom and kind advice, and only debate with them in the best manner.”⁷¹

Contrary to this judicial perspective, religious clerics justify FCs as their religious duty.

In fact, the insistence of conversion is a recurring theme among these religious leaders. According to one such religious figure

“When a girl is brought before a Qazi for conversion to Islam, the Qazi must comply immediately. If he delays the conversion to even say his prayers, he himself becomes Kafir.”⁷²

Many clerics celebrate the conversion of Hindu girls and women as a victory for the Muslim faith, sending a message to their followers that converting non-Muslim girls through FCM is a good deed, while simultaneously sending a message to the vulnerable communities that their girls are not safe.⁷³ Perpetrators, with the assistance of certain religious organisations, attempt to legalize these FCs by issuing certificates of conversion that lack legal validity and fall outside the scope of the law.⁷⁴

Additionally, the religious motivation behind FC can absolve perpetrators of any personal remorse or guilt for the sexual violence inflicted on FCM survivors, including rape and forced prostitution. In these cases, this belief may serve as a justification, with perpetrators believing they have done something noble by converting the survivor to Islam, despite having abducted, raped, and exploited her. Thus, conversion is used not only to gain societal support but also to personally and psychologically legitimise the violence committed against the girls from RMCs in the cases of FCM.⁷⁵

4.1.2. Ideologically Motivated Sexual Grooming

‘Ideologically motivated sexual grooming’ has been identified as a primary motive for targeting poor young girls and women from RMCs. It is a form of manipulation and exploitation where individuals or groups systematically target vulnerable persons, often from minority communities, who have one or more vulnerabilities due to economic deprivation, personal hardship, harsh family circumstances, and societal rejection,⁷⁶ with the aim of converting them to their own ideology or belief system. It is

“a very particular type of power relationship used to prepare or position an individual for abusive and exploitative behaviour.”⁷⁷

⁷¹ Nasira vs. Judicial Magistrate, Lahore High Court (LHC) 4414 (2019)

⁷² Ali, Naziha Syed. (2017, 17 July). The Truth about Forced Conversions in Thar, The DAWN, Available at: < <https://www.dawn.com/news/1345304> >

⁷³ Jahangir, Sulema. (2020, April 12). Forced Conversions, The DAWN, Available at: < <https://www.dawn.com/news/1548550> >

⁷⁴ Ibid (n 31), Page 8

⁷⁵ The LAS conducted the said interview on 21 September 2024

⁷⁶ Tadros, Mariz. (2020). It is Time we Recognize how Ideologically Motivated Sexual Grooming Targets Women from Religious Minorities, Coalition for Religious Equality and Inclusive Development, Pages 1-7, Available at: < <https://www.ids.ac.uk/download.php?file=wp-content/uploads/2020/08/CREID-Briefing-Note-Ideologically-Motivated-Sexual-Grooming-MT-August-2020.pdf> >

⁷⁷ Petherick, Wayne A. and Sinnamon, Grant. (2017). The Psychology of Criminal and Antisocial Behavior: Victim and Offender Perspectives, Academic Press, Pages 459-487.

This grooming process involves a combination of emotional manipulation, psychological coercion, and sometimes economic incentives to induce the survivors into adopting new beliefs and, in many cases, being induced to live with the perpetrator without being converted or participating in practices that they would not have otherwise chosen.⁷⁸ In cases of FCM, the actual intention is to convert the survivor to their religion and ‘win over’ converts to their religious community.⁷⁹ The primary objective of this ideologically motivated sexual grooming aims to create a religiously homogeneous society.

4.1.3. Trafficking and Prostitution

Trafficking and Prostitution is a major factor behind FCM in Pakistan, motivated by various exploitative intentions. Trafficking involves the recruitment, transportation, transfer, harbouring, or receipt of persons through force, fraud, or coercion for the purpose of exploitation, including sexual exploitation and forced labour.

In the context of FCM, perpetrators exploit vulnerable girls and women from RMCs, often luring them under false pretences or through coercion into marriages where they are subsequently subjected to exploitation.

Moreover, trafficking survivors are frequently forced into marriages with promises of economic betterment, social status elevation, or escape from dire circumstances such as poverty, discrimination, or violence.

These marriages are used as a guide to traffic survivors into situations of sexual or labour exploitation, where they are deprived of their autonomy and are subjected to abuse. autonomy and are subjected to abuse.

The economic incentives for traffickers are substantial, as they profit from exploiting the labour or sexual services of survivors who are coerced into marriages under the guise of conversion. This form of trafficking operates within a broader context of societal and legal impunity, where perpetrators often evade accountability due to weak enforcement of laws against trafficking and FMs.⁸⁰ Moreover, cultural and religious norms that prioritize patriarchal authority and control over women further exacerbate vulnerabilities, enabling perpetrators to exploit survivors with relative impunity.

4.1.4. Sexual Motivations and Power Dynamics: Dominance and Control over Girls’ and Women’s Bodies

Perpetrators of FCM are driven not only by the desire to convert non-Muslims to Islam but also to control individuals through purported love or choice marriages. Rape or other forms of sexual violence are often committed against vulnerable individuals, typically children, as a means of asserting dominance or shaming entire communities as the primary motivation,⁸¹ which is often reiterated by minority rights activists and legal experts interviewed for this research.⁸²

⁷⁸ Ibid (n 82), Page 4

⁷⁹ Tadros, Mariz. (2021). Coercive Consent? Unlocking the Truth Behind Disappearing Women in Pakistan, Institute of Development Studies, Available at: < <https://www.ids.ac.uk/opinions/coercive-consent-unlocking-the-truth-behind-disappearing-women-in-pakistan/> >

⁸⁰ United Nations Office on Drugs and Crime (UNODC) and United Nations Global Initiative to Fight Human Trafficking (UN.GIFT). (2008, January). An Introduction to Human Trafficking: Vulnerability, Impact, and Action, Pages 1-128, Available at: < https://www.unodc.org/documents/human-trafficking/An_Introduction_to_Human_Trafficking_-_Background_Paper.pdf >

⁸¹ De Schrijver, Lotte., Fomenko, Elizaveta., Krahé, Barbara., Roelens, Kristien., Beken, Tom Vander., and Keygnaert, Ines. (2022, April). Minority Identity, Othering-Based Stress, and Sexual Violence. International Journal of Environmental Research and Public Health, Volume No. 19, Issue No. 7, Pages 1-19; Armstrong, Elizabeth A., Gleckman-Krut, Miriam., and Johnson, Lanora. (2018, July). Silence, Power, and Inequality: An Intersectional Approach to Sexual Violence, The Annual Review of Sociology, Volume No. 44, Issue No. 1, Pages 99-122

⁸² The LAS conducted the said interviews on 1 June 2024 and 8 June 2024

One of the FCM survivors, interviewed during IDI, shared that she had been drugged and abducted by her perpetrator after which she was forcibly converted before being married to him. She was held in confinement for three months, during which she was repeatedly drugged and raped each night.⁸³

These actions stem from oppressive attitudes and beliefs ingrained in societal norms, which dictate the value placed on certain individuals over others.⁸⁴ In patriarchal societies like Pakistan, gender norms further dictate that men hold power and authority over women.⁸⁵ This hierarchical structure not only normalizes but also legitimizes violence against women and girls as a means of maintaining control and dominance, and regulating women's mobility, sexuality, and choices, particularly concerning marriage and community expectations.⁸⁶

Since the notion of family's honour is embodied in the bodies of the women and is closely tied to their virginity and chastity, perpetrators exploit these cultural norms to commit acts of abduction and rape, intended to deliberately shame and intimidate the survivors, their families, and their communities.⁸⁷ Additionally, some perpetrate sexual violence simply because they believe they can do so with impunity.

The victimization of children is due to the ease and convenience in which perpetrators force, coerce, manipulate, and control children, but

also is linked with child sexual abuse. Research identifies perpetrators having four motivations for pursuing child marriages: emotional congruence, sexual arousal, blockage, and disinhibition:⁸⁸

1. **Emotional Congruence:** Offenders derive emotional satisfaction from sex with children.
2. **Sexual Arousal:** Men who offend are sexually aroused by a child.
3. **Blockage:** Men have sex with children because they are unable to meet their sexual desires in more socially acceptable ways.
4. **Disinhibition:** These men become disinhibited and behave in ways they would not normally behave.

Girls and women from RMCs are particularly at risk of sexual violence due to the systematic disenfranchisement and disempowerment of these communities.⁸⁹ This vulnerability is exacerbated due to intersectional forms of oppression being female, a member of the RMCs and more often than not, economically vulnerable.⁹⁰

⁸³ The LAS conducted the said interview on 21 September 2024

⁸⁴ Kalra, Gurvinder., and Bhugra, Dinesh. (2013, July). Sexual Violence Against Women: Understanding Cross-Cultural Intersections, *Indian Journal of Psychiatry*, Volume No. 55, Issue No. 3, Pages 244-249

⁸⁵ Ali, Tazeen S., Krantz, Gunilla., Gul, Raisa., Asad, Nargis., Johansson, Eva., and Mogren, Ingrid. (2011, November 2). Gender Roles and Their Influence on Life Prospects for Women in Urban Karachi, Pakistan: A Qualitative Study, *Global Health Action*, Volume No. 4, Pages 1-9

⁸⁶ Greco, Donna. and Dawgert, Sarah. (2007). Poverty and Sexual Violence: Building Prevention and Intervention Responses, *Pennsylvania Coalition Against Rape*, Pages 1-89, Available at: < <https://docs.google.com/document/d/1VPtc8-7HrF7WmcJfzlUXEhYQLXEm4Mjw/edit> >

⁸⁷ Hadi, Abdul. (2019). Patriarchy and Gender Based Violence in Pakistan, *European Journal of Social Science, Education, and Research*, Volume No. 6, Issue No. 1, Pages 113-125

⁸⁸ Finkelhor, David. (1984). *Child Sexual Abuse: New Theory and Research*, New York Free Press, Pages 1-304

⁸⁹ Ibid (n 27)

⁹⁰ Ibid (n 81), Page 3

Further, the majority-minority identity framework creates an unfair power balance, leaving girls and women from RMCs vulnerable to force, coercion, exploitation or manipulation and reduced access to justice and grievance redressal mechanisms, support services, or legal safeguards.⁹¹ Poverty and economic insecurity, often associated with RMCs, particularly girls and women, increase vulnerabilities to sexual violence by limiting individuals' ability to escape abusive situations or seek recourse. Economic dependence can trap individuals in exploitative relationships where they are coerced or manipulated into sexual acts.⁹² Furthermore, given the marginalization of the community, there is a high likelihood of perpetrators facing little to no consequences due to the apathetic response from the government and criminal justice system. This is compounded by the impunity granted to such acts, where many believe that converting someone to Islam is justified.

4.1.5. Impunity for Perpetrators of FCM: Lack of Legal Consequences Resulting in Increased Incidence

Legal impunity is one of the biggest contributing factors for continued occurrence of FCM. The limited response to sexual violence *"perpetuates cruel, careless, and callous attitudes of the perpetrators"*⁹³ who are emboldened by the weak enforcement of laws and the lack of legal action.

The National Commission on the Rights of Child (NCRC) highlights that *"the abductors usually file a counter FIR or legal proceedings against the family members of the girl to intimidate or threaten them"*⁹⁴ and courts frequently rely on the coerced *"testimony of the abducted girl or women, who are under the influence of the abductors."*⁹⁵

There are two reasons for the acquittal of perpetrators of FC. Firstly, the *"Lower Courts and the High Courts have failed to follow proper procedures in cases of FC"* and secondly, *"the Judiciary itself is subject to fear of reprisal from extremist elements during the proceedings of such cases."*⁹⁶

Further, statements that perpetuate a narrative of survivor blaming further embolden perpetrators by minimizing the severity of FCs. For instance, the Parliamentary Committee on FC, made the following statement:

⁹¹ United Nations and United Nations Human Rights, Office of the High Commissioner (OHCHR). (2010). *Minority Rights: International Standards and Guidance for Implementation*, Pages 1-48, Available at: < https://www.ohchr.org/sites/default/files/Documents/Publications/MinorityRights_en.pdf >

⁹² Biello, Katie Brooks., Sipsma, Heather L., Ickovics, Jeannette R., and Kershaw, Trace. (May, 2010). *Economic Dependence and Unprotected Sex: The Role of Sexual Assertiveness Among Young Urban Mothers*, *Journal of Urban Health*, Volume No. 87, Issue No. 3, Pages 416-425

⁹³ Ahmad, Ambreen. (2013, February 21). *Rape: The Culture of Silence*, *The DAWN*, Available at: <https://www.dawn.com/news/787658/rape-the-culture-of-silence>; T. Ibrahim, Zofeen. (2014, October 26). *State of Neglect: Closed Eyes to Sexual Assault*, *The DAWN*, Available at: <https://www.dawn.com/news/1140065>

⁹⁴ Ibid (n 9), Page 10

⁹⁵ Kanwar, Maryam, and Abbas Mirza, Jaffer. (2021). *13-year-old Hindu Girl Kavita is the Latest Victim of Organized Forced Conversions in Sindh*, *The Coalition for Religious Equality and Inclusive Development (CREID)*, Pages 1-7

⁹⁶ The United States Department of State. (2022). *The International Religious Freedom Report: Pakistan 2022*, Available at: < <https://www.state.gov/wp-content/uploads/2023/05/441219-PAKISTAN-2022-INTERNATIONAL-RELIGIOUS-FREEDOM-REPORT.pdf> >

"In most cases of FC, there is some degree of willingness on the part of the girl. We observed that the majority of girls and boys were in contact with each other and secretly decided to elope and marry." ⁹⁷

Moreover, the survivors and lawyers working with them have also reported incidents where the police themselves have provided support to the perpetrator, for example by facilitating contact between the perpetrators and survivors. This can have an extremely detrimental impact on the case and violates principles of fair trial. Survivors, already in a psychological state, may refuse returning to their families or be manipulated into denying that their conversation and marriage were forced in the court. This not only endangers the survivors but also signals to the perpetrators that they can expect support from within the system even after a case is filed, allowing them to evade legal consequences. ⁹⁸

4.1.6. Glorification and Sensationalizing in Media

In Pakistan, the media often walks a fine line between raising awareness and sensationalizing issues such as sexual violence and FCM. While some media portrayals aim to highlight the grim realities and injustices faced by survivors, others focus on portraying shocking and salacious aspects rather than the underlying systemic issues, reducing complex social problems to mere headlines. Wu et al., observed that the media tends to focus on egregious crimes, sensationalise them, and exaggerate their frequency, which amplifies public fear.⁹⁹ For example, Pakistani TV dramas frequently depict sexual violence and FMs in highly dramatized and emotional narratives, which can attract viewership, but also risk trivializing the severity of these issues, ultimately undermining policy efforts aimed at addressing societal-level factors for long-term solutions.¹⁰⁰

Academic studies and media analyses have pointed out that such sensationalist reporting and dramatization can contribute to a culture of voyeurism, where the focus shifts to the spectacle of the crime rather than creating a deeper understanding or driving meaningful change. Furthermore, the portrayal of women in media often reinforces stereotypes and fails to challenge the societal norms that underpin GBV. This contributes to the normalization of sexual assault and violence to control women, presenting violent and aggressive content

⁹⁷ Ali, Kalbe. (2020, October 20). Conversion of Hindu Girls in Sindh Cannot be Considered Forced: Senator, The DAWN, Available at: < <https://www.dawn.com/news/1585956> >

⁹⁸ The LAS conducted the said interviews on 08 June 2024 and 21 September 2024

⁹⁹ Wu, Yuning., Li, Feng., A. Tripplett, Ruth., and Y. Sun, Ivan. (2019). Media Consumption and Fear of Crime in a Large Chinese City, Social Science Quarterly, Volume No. 100, Issue No. 6, Pages 2337-2350

¹⁰⁰ Lonne, Bob. and Gillespie, Kerri. (2014). How do Australian Print Media Representations of Child Abuse and Neglect Inform the Public and System Reform?: Stories Place Undue Emphasis on Social Control Measures and too Little Emphasis on Social Care Responses, Journal of Child Abuse and Neglect, Volume No. 38, Issue No. 5, Pages 837-850

against women as normal and acceptable.¹⁰¹ Such portrayals reinforce stereotypical tropes about both genders, sustaining the status quo¹⁰² and perpetuating the power dynamics between dominant males and vulnerable females, which form the basis of FCM.

In cases of FC, the role of media has sometimes made it easier for perpetrators to evade criminal prosecution. The lack of comprehensive and nuanced reporting on the complexities of FCM results in a simplistic and incomplete projection of incidents. The media often claim that survivors converted to Islam of their own will because they were in love with the perpetrator, circumventing the nuances of the case, such as the minority status of the survivor and the age difference between her and the accused, and the power dynamics between them.¹⁰³ Consequently, the survivor is perceived not as a survivor of FCM but as the instigator of elopement, and due to religiosity and preference, it is not considered a violation. This misrepresentation gives perpetrators impunity from both the courts and society, further entrenching the cycle of violence and exploitation.

Unethical journalism and media notoriety disclosing the identity of the survivor, places her as a spectacle for the public for all times to come resulting in the survivor constantly reliving that one incident in her life and bearing the psychological trauma and socio-cultural stigma perpetually.

4.2. Targeted Victims: Understanding the Vulnerabilities and Factors Influencing Victimization

Understanding why girls and women from RMCs in Pakistan become targets of violence, such as FCM, requires a multi-layered analysis. As noted earlier, these individuals are particularly targeted due to a complex interplay of socio-cultural, economic, and political factors. Deeply entrenched patriarchal norms in Pakistani society marginalizes girls and women, undermining their autonomy and rights and making them susceptible to coercion and violence. These norms intersect with religious intolerance, where extremist ideologies and societal prejudices view religious minorities as inferior and legitimate targets for conversion to Islam. Perpetrators exploit the systematic marginalization of religious minorities to justify and perpetuate FCM, often claiming to protect or 'save' women under the guise of romantic relationships or religious duty.

This section explores the reasons of vulnerability of girls and women to FCM, including the socio-cultural, economic, and political factors that increase the risk of victimisation.

¹⁰¹ Rutledge, A. Lashay, Prohaska, Ariane., Dewey, Susan., and Roskos, Beverly. (2022). Violence Against Women on Netflix, The University of Alabama Press. Pages 1-61, Available at: < <https://ir-api.ua.edu/api/core/bitstreams/3a76bae0-66fe-4d04-a787-f4ece7e6d6b8/content> >

¹⁰² Zulfiqar, Fatima., Hafeez, Erum., and Aziz, Atif. (2023). Glorification of Misogyny and Violence in Pakistani TV Dramas and its Impact on Young Women in Karachi, Pakistan Journal of Humanities and Social Sciences, Volume No. 11, Issue No. 4, Pages 4438-4456

¹⁰³ Jafri, Qamar Abbas. and Hussain, Wafa. (2023). Ideology, Conflict, and Sexual Violence in Pakistan, Knowledge Platform, Security, and Rule of Law (KPSRL), Pages 1-6, Available at: < <https://www.kpsrl.org/sites/default/files/2020-12/Ideology%2C%20Conflict%20and%20Sexual%20Violence%20in%20Pakistan.pdf> >

4.2.1. Cognitive Vulnerability: Children's Limited Cognitive Development and Susceptibility to Sexual Violence and Forced Marriage

As children progress emotionally, they learn to manage their feelings and empathise with others. This emotional susceptibility is exploited by manipulative individuals who leverage children's empathy to maintain control and perpetrate abuse. Moreover, children often lack comprehensive knowledge of their rights and legal protections due to their developmental stage, limited exposure to information, and prevailing social norms.¹⁰⁴ In Pakistan, children's cognitive development is crucially impacted by societal taboos around discussing sexual topics, encompassing not only the physical act but also aspects such as a child's anatomy, potential risks from others, prevention methods from sexual abuse such as good touch/bad touch, the implications of marriage, and their legal rights and protections.¹⁰⁵ This lack of education and awareness leaves children vulnerable to exploitation, including sexual abuse and rape, as they may lack the knowledge and skills to recognize and report such incidents effectively. Additionally, societal taboos and lack of sexual education further impair children's ability to protect themselves. Throughout childhood and adolescence, these developmental vulnerabilities intersect with the influence of societal norms and peer relationships.

At the societal level, child sexual abuse is enabled when children's rights are not recognized or are not recognised to be as important as social standing. The laws and policies prohibiting and penalising child sexual abuse and rape have weak enforcement of social norms against sexual violence, gender inequality, and the lack of will to act. Further, constructions of masculinity emphasize aggression and sexual dominance in the society.

4.2.2. Adolescence, Rebellion, and Risk-Taking: Vulnerabilities Exploited by Predators

Adolescence marks a phase of significant physical, emotional, and psychological transformations, representing a transition from childhood to adulthood.¹⁰⁶ The period of adolescence is recognized as being one of major changes in physical and psychological development, when a key goal for an individual is 'discovery of self'.¹⁰⁷ A powerful combination of biological, psychological, and social changes make adolescents more likely to engage in risk-taking behaviours than children or adults, and these changes contribute both to opportunities for healthy growth and the risk of negative outcomes.¹⁰⁸ Their quest for independence is often exploited by perpetrators who employ emotional manipulation, financial incentives, and social isolation tactics.¹⁰⁹

¹⁰⁴ Ibid (n 112), Page 85

¹⁰⁵ Khan, Ayesha. (2000, June). Adolescents and Reproductive Health in Pakistan: A Literature Review, United Nations Population Fund (UNFPA) and Populations Council, Pages 1-64, Available at:

< https://knowledgecommons.popcouncil.org/cgi/viewcontent.cgi?article=2854&context=departments_sbsr-rh >

¹⁰⁶ Moreira, Maria Teresa., Rocha, Elizabeth., Lima, Andreia., Pereira, Lúcia., Rodrigues, Sílvia., and Fernandes, Carla Sílvia. (2023, July 19). Knowledge about Sex Education in Adolescence: A Cross-Sectional Study. *Adolescents*, Volume No. 3, Issue No. 3, Pages 431-445

¹⁰⁷ Scannapieco, Maria. and Connell-Carrick, Kelli. (2005, February). Focus on the First Years: Correlates of Substantiation of Child Maltreatment for Families with Children 0 to 4. *Children and Youth Services Review*, Volume No. 27, Issue No. 12, Pages 1307-1323

¹⁰⁸ Calkins, Susan D. (2010). Commentary: Conceptual and Methodological Challenges to the Study of Emotion Regulation and Psychopathology, *Journal of Psychopathology and Behavioral Assessment*, Volume No. 32, Issue No. 1, Pages 92-95

¹⁰⁹ Walker, Kate., Pillinger, Claire., and Brown, Sarah. (2018, February). Characteristics and Motivations of Perpetrators of Child Sexual Exploitation: A Rapid Evidence Assessment of Research, Centre for Expertise on Child Sexual Abuse, Pages 1-39, Available at: < <https://www.csacentre.org.uk/app/uploads/2023/10/CSE-perpetrators-2-Characteristics-and-motivations-of-perpetrators-of-CSE.pdf> >

During adolescence, individuals usually undergo initial stages of sexual maturation, often accompanied by a newfound sense of independence.¹¹⁰ However, they are often inadequately prepared for these experiences.

Understanding sexuality is a crucial aspect of healthy adolescent development, with positive implications for their lives, such as reducing the risk of Sexually Transmitted Diseases (STDs), making informed decisions, establishing healthy relationships, improving self-esteem and confidence, and building a foundation for fulfilling relationships.¹¹¹

There are three critical psychological and cognitive transformations that increase vulnerabilities of adolescents to FCM. Firstly, adolescents often engage in risk-taking behaviours as a form of asserting autonomy. Predators exploit this rebellious spirit by offering false promises of freedom or excitement, manipulating adolescents who are seeking avenues to defy perceived constraints. Additionally, adolescents in rebellion often crave independence and may view older individuals, especially those who appear understanding or supportive, as allies against parental or societal control. Despite their confidence, adolescents lack the life experience and maturity to accurately assess risks or understand the long-term consequences of their decisions. Predators leverage this naivety by normalizing or even glamorizing risky behaviours, particularly in relationships and sexual contexts, convincing adolescents that such actions are acceptable or desirable.

Secondly, emotional instability during adolescence can lead to susceptibility to manipulation. Predators capitalize on feelings of alienation, frustration, or a strong desire for acceptance by offering emotional support, validation, or affection, which adolescents may interpret as genuine care, thus becoming susceptible to exploitation. Predators abuse this vulnerability through grooming tactics involving flattery, gifts, or attention, gradually escalating towards sexual exploitation or proposals of marriage under the guise of love or commitment. Lastly, in today's digital era, adolescents spend significant time online, where they encounter various forms of social media and digital platforms. Predators take advantage of these anonymous platforms to establish relationships, gather personal information, and manipulate adolescents into exploitative situations through grooming tactics in chat rooms, social media, or online gaming platforms.

Predators of sexual violence and FC often target children and adolescents from RMCs in particular because of multiple vulnerabilities that increase their risk and susceptibility to abuse. Firstly, these perpetrators recognize that children and adolescents are vulnerable to coercion and manipulation, especially when faced with threats or intimidation tactics. Religious minority children and adolescents may be even more susceptible to such tactics due to their marginalised status within society. Predators exploit this vulnerability by leveraging fear and intimidation to silence survivors and prevent them from seeking help or reporting abuse.

¹¹⁰ Kar, Sujita Kumar., Choudhury, Ananya., and Singh, Abhishek Pratap. (2015, April). Understanding Normal Development of Adolescent Sexuality: A Bumpy Ride, *Journal of Human Reproductive Sciences*, Volume No. 8, Issue No. 2, Pages 70-74

¹¹¹ Hegde, Anupama., Chandran, Suhas, Pattnaik, Jigyansa Ipsita. (2022, July). Understanding Adolescent Sexuality: A Developmental Perspective, *Journal of Psychosexual Health*, Volume No. 8, Issue No. 2, Page 70-74

Moreover, perpetrators exploit the systemic discrimination and lack of resources that RMCs often face. These groups may have limited access to justice mechanisms or social support networks, making it easier for perpetrators to act with impunity. Predators understand that RMCs may be reluctant to engage with authorities or institutions due to historical mistrust or fear of further marginalization.¹¹²

Predators also understand that they shall get undeniable support from the far-right members of society, not only clerics but from all walks of life, which include officials to the clerk in the courtroom, in these intimidating and prejudiced circumstances.¹¹³ Sometimes families opt to not even initiate a fight for the survivor, leaving her to fate, solely to avoid any untoward repercussions for the rest of her community.

4.2.3. Gender-Specific Vulnerabilities of Women

Women, particularly from RMCs, face unique vulnerabilities that make them prime targets for FCM. Gender inequality and cultural norms create an environment where women's autonomy is severely restricted and they are relegated to subordinate roles within families and communities, limiting their decision-making power over critical life choices, including matters of marriage and religious affiliation.¹¹⁴ These norms create a context where women and girls are expected to conform to cultural practices as a means to

maintain familial honour and communal identity.¹¹⁵ Deviation from these norms can result in severe repercussions such as social ostracization, threats of violence, or even physical harm.¹¹⁶

In patriarchal societies, where notions of honour and control over women intersect with religious or communal identity, the risks are exacerbated, particularly for women from RMCs. Predators manipulate familial and community pressures to enforce conversions through coerced or forced marriages. For example, the desire to avoid traditional arranged marriages within their communities can drive some girls to seek alternatives, unwittingly exposing themselves to individuals who offer false promises of freedom, love, or better opportunities. Perpetrators of FC often use these vulnerabilities to entice girls with offers of marriage and conversion under the guise of providing escape from restrictive cultural norms or familial expectations. When girls enter into relationships with Muslim men, or are abducted, enticed, and sexually assaulted, they are often made to believe they have violated social and cultural norms, bringing shame upon themselves and their families. Faced with this perceived dishonour, they feel compelled to comply with demands for conversion through marriage, seeing it as one of the few options available to protect both their and their families' honour, as noted by the survivors of FCM and the lawyer who specialises in pursuing cases of FCM.¹¹⁷

¹¹² Minority Rights Group International and Sustainable Development Policy Institute (SDPI). (2014). Searching for Security: The Rising Marginalization of Religious Minority Communities in Pakistan, Pages 1-38, Available at: < https://sdpi.org/sdpiweb/publications/files/MRG_Rep_Pak_ENGv2_PRESS.pdf >

¹¹³ The LAS conducted the said interviews on 01 June 2024 and 08 June 2024

¹¹⁴ Ali, Tazeen Saeed., Ali, Shahnaz Shahid., Nadeem, Sanobar., Memon, Zahid., Soofi, Sajid., Madhani, Falak., Karim, Yasmin., Mohammad, Shah., and Bhutta, Zulqar Ahmed. (2022). Perpetuation of Gender Discrimination in Pakistani Society: Results from a Scoping Review and Qualitative Study conducted in Three Provinces of Pakistan, BMC Women's Health, Volume No. 22, Issue No. 540, Pages 1-21

¹¹⁵ Agha, Nadia Ali. (2021). Kinship, Patriarchal Structure and Women's Bargaining with Patriarchy in Rural Sindh, Pakistan, Palgrave Macmillan: Singapore, Pages 1-285

¹¹⁶ Ibid (n 126), Page 15

¹¹⁷ The LAS conducted the said interviews on 01 June 2024 and 03 June 2024

Economic dependency exacerbates the situation, as limited access to education and employment opportunities can push women towards marriages perceived as pathways to economic stability or social advancement, despite the coercive nature of conversion.¹¹⁸ Perpetrators exploit these vulnerabilities through manipulative tactics such as emotional manipulation, promises of security, or threats of harm, thereby eroding the agency and ability of girls and women to resist coercion.¹¹⁹ Legal frameworks intended to protect against such abuses often fall short, either due to gaps in legislation, inadequate enforcement, or a lack of recognition of FC as a distinct form of GBV, leaving survivors without adequate recourse or protection.

Cultural and religious dynamics also play a significant role, as perpetrators may manipulate religious teachings to justify their actions, presenting FC as necessary for preserving cultural or religious purity.¹²⁰ This manipulation complicates struggles of survivors to reconcile their faith with their traumatic experiences, often perpetuating cycles of abuse within communities.¹²¹ Moreover, the absence of robust support structures within communities further isolates survivors, leaving them without the necessary resources for protection, recovery, or legal assistance.¹²² Several interviewees underscored that girls and women from RMCs often lack knowledge not only about their own faith but also about Islam. Influenced by media portrayals and societal pressures, some convert without fully comprehending the tenets of Islam or the implications of relinquishing their own beliefs, leaving them vulnerable to exploitation.

The victims neither having adequate knowledge of religion nor being aware of the law, while being enslaved by socio-cultural stigmas and fears, are further threatened by their abductors that since they are now a Muslim, if they ever attempt to revert back to their earlier faith they may be branded an apostate and killed. Torn between the fear of disownment from her community and parents, and the possibility of death for being declared an apostate, the survivor of FCM is left with no choice but to comply with each demand of her abductor.

Pakistan's legal framework often fails to adequately protect religious minorities, leaving them exposed to discrimination and exploitation. Discriminatory policies and societal norms contribute to their marginalization, limiting access to education, economic opportunities, and social services.¹²³ The economic disadvantage makes minority families more susceptible to offers of financial incentives or promises of improved living conditions in exchange for conversion. Moreover, entrenched religious and cultural biases perpetuate stereotypes and discrimination against minority communities, fostering an environment where minority girls and women are viewed as easier targets for exploitation and sexual needs. The lack of effective legal protections further exacerbates their vulnerability, allowing perpetrators to manipulate and coerce them into marriages that often involve FC.

¹¹⁸ The LAS conducted the said interview on 11 June 2024

¹¹⁹ The LAS conducted the said interview on 11 June 2024

¹²⁰ The LAS conducted the said interview on 01 June 2024

¹²¹ The LAS conducted the said interviews on 01 June 2024 and 03 June 2024

¹²² The LAS conducted the said interview on 11 June 2024

¹²³ Ibid (n 122), Page 3

4.2.4. Intersection of Socio-Cultural and Economic Factors

Historically, conversion has often been attractive to economically disadvantaged or marginalized individuals seeking to improve their social and economic status. For many, adopting a new religion can offer pathways to better opportunities, acceptance, and resources that were previously inaccessible.¹²⁴ This allure is especially strong in contexts where religious affiliation is closely tied to socio-economic benefits, such as access to education, employment, and social services. In many cases, conversion is seen as a strategic move to escape poverty and discrimination, aligning oneself with a more powerful community to gain protection, support, and upward mobility. This dynamic has been observed across various historical periods and regions, highlighting the intricate link between religion and socio-economic advancement. For example, Christian missionaries in the sub-continent focused specifically on Dalits or lower caste Hindus instead of privileged caste Hindus resulting in the phenomenon of mass conversion in the Sialkot district between 1880 to 1930.¹²⁵

In a Pakistani study on FCM, the author using the limited interpretation of 'force' opposed the existence of FCM in Sindh, stating that most of the conversions were consensual. However, he observed that he *"found the factors that are working the same like physical force and*

*compelling them to change their religion. These factors are psychological, social, political and financial."*¹²⁶ He concluded that mass conversions of scheduled caste Hindus in Sindh are driven more by socioeconomic marginality than religious factors, with historical roots and media projection post 9/11 amplifying the issue, arguing that Islam provides the nearest shelter for those facing caste discrimination and socio-economic hardship.¹²⁷

RMCs in Pakistan face severe economic marginalization, perpetuating cycles of poverty, and exclusion. Studies, such as the Pakistan Partnership Initiative's research¹²⁸ on Christian youth, reveal that a majority of Christian families live below the poverty line, struggling to access essential services like education and healthcare. Similarly, Hindus also experience economic hardship, often relegated to low-paying jobs such as sanitation work and agricultural labour, or trapped in bonded labour in industries like brick kilns. This economic exploitation not only limits financial stability but also reinforces cycles of poverty, where families continually struggle with borrowing and repayment. *"At both policy and implementation levels, disparities hinder religious minorities from achieving their fullest potential and having access to better economic opportunities."*¹²⁹ This encourages the system of cyclic poverty i.e. the concept describes how *"a household is struggling over time to stay afloat through repeated acts of borrowing, repaying, borrowing again, and so on."*¹³⁰

¹²⁴ Pervaiz, Huma. and Mahmood, Tahir. (2018). Mass Conversion To Christianity: A Case Study Of Chuhra Community In Sialkot District (1880-1930). Pakistan Vision, Volume No. 19, Issue No. 1, Pages 40-59. Available at: <https://pu.edu.pk/images/journal/studies/PDF-FILES/Article_3_2018_07_12.pdf>

¹²⁵ Ibid (n 136), Page 40

¹²⁶ Hussain, Ghulam. (2020, October 20). Forced Conversions and Faith Conversions: Rhetoric and Reality, Institute of Policy Studies Islamabad, Pages 1-82, Available at: < <https://www.ips.org.pk/wp-content/uploads/2020/10/13-Faith-Conversions-or-Forced-Conversions-final-1.pdf> >

¹²⁷ Ibid (n 138), Page 70

¹²⁸ Bennett, Jennifer. and Aziz, Shagufta. (2020). Challenges of Christian Youth in Pakistan: People's Perspective, Pakistan Enterprise for Sustainable Development (Private) Limited, Pages 1-32, Available at: < https://ppcollaboration.org/wp-content/uploads/2024/04/Challenges-of-Christian-Youth-in-Pakistan-People_s-Perspective.pdf >

¹²⁹ Noel, Zeeshan., Faheem, Joseph., Malik, Suneel., and Shafquat, Emmanuel. (2023, October). Tedious Path to Poverty Alleviation: An Assessment about Indebtedness and Cyclic Poverty among Religious Minorities in Punjab, Pakistan, Centre for Social Justice, Pages 1-52, Available at: < https://csjpak.org/pdf/Tedious_Path_Poverty_Alleviation.pdf >

¹³⁰ Ibid (n 139), Page 3

Furthermore, educational attainment among RMCs is hindered by discriminatory practices and unsafe learning environments and lack of resources due to their existing economic marginalization. Many minority children face bias in school curriculum.¹³¹ For girls belonging to RMCs, the matter becomes more challenging as they often find limited opportunities for schooling owing to cultural and societal norms that often prioritize male education. The lack of safe and accessible secondary schools result in high drop outs of girls at this level. Discrimination from teachers and peers alike, coupled with the fear of violence discourages parents from sending their children, especially girls, to school, further hindering educational opportunities and achievement.

Systemic discrimination extends to employment, where minorities are underrepresented in public sector jobs despite constitutional guarantees of equality. Affirmative action policies intended to improve representation often fail in practice, with RMCs largely confined to lower-level positions.¹³² This exclusion from stable, well-paying jobs exacerbates economic vulnerability and perpetuates marginalization. Employment opportunities for minority women are even more severely restricted, often confining them to low-paying, informal sector jobs such as domestic help, agricultural labour, or labour in the textile industry, where they face exploitative conditions, long hours, and minimal wages.¹³³ Discrimination in the workplace further limits their career

advancement and income potential. According to the Human Rights Commission of Pakistan (HRCP), these women frequently encounter bias and harassment, which discourages them from seeking better employment opportunities.¹³⁴

Economic vulnerability also makes minority women more susceptible to FC and FCM. Perpetrators exploit their precarious financial situations, offering monetary incentives or promises of better living conditions in exchange for conversion and marriage. For example, as noted by a minority rights advocate,

“the girls get attracted by the gifts and are shown green pastures and they run away chasing such dreams.”¹³⁵

Legal and policy frameworks intended to protect minority rights are often inadequately enforced, leaving minority women without effective recourse for justice. Despite provisions against discrimination and GBV, enforcement is weak, and minority women seldom receive fair treatment in the legal system. The NCHR has called for more robust implementation of laws and greater support for minority women's rights to address these disparities.¹³⁶

¹³¹ Panjwani, Farid. and Chaudhary, Camilla Hadi. (2022). Towards a Rights-based Multi-religious Curriculum? The Case of Pakistan, Human Rights Education Review, Volume No. 5, Issue No. 2, Pages 56–76

¹³² Sohail, Khushbakht (2022). Unequal Citizens: Ending Systematic Discrimination Against Minorities, National Commission for Human Rights (NCHR), Pages 1-84, Available at: < <https://www.nchr.gov.pk/wp-content/uploads/2022/05/Minority-Report.pdf> >

¹³³ Red Lantern Analytica. (2024, June 10). The Status of Minority Women in Pakistan, Available at: < <https://redlanternanalytica.com/the-status-of-minority-women-in-pakistan/> >

¹³⁴ Zia, Farah. (2021). State of Human Rights in 2020, Human Rights Commission of Pakistan (HRCP), Pages 1-249, Available at: < https://hrcp-web.org/hrcpweb/wp-content/uploads/2020/09/website-version-HRCP-AR-2020-5-8-21_removed.pdf >

¹³⁵ The LAS conducted the said interview on 11 June 2024

¹³⁶ Ibid (n 42), Page 66



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Broken by Faith

Forced Conversion through Marriage leaves victims—mostly girls and women from religious minorities—scarred with lifelong psychological trauma.

5. IMPACT OF FORCED CONVERSIONS THROUGH MARRIAGE

The impact of FCM cannot be denied despite inadequate and credible data on the exact number of cases. Whether it is the reporting of high numbers of incidence across the country, or even one or two cases in a community, the impact is immense, having severe and far-reaching effects on victims, RMCs, and society at large.

5.1. The Survivor

The survivor, typically a girl or woman from a religious minority background, experiences extreme psychological trauma as a result of FCM. All the interviewees who have worked directly with survivors have highlighted the long term damage of FCM on the girls and women and their sense of self worth.¹³⁷ The coercion involved in abandoning their religious beliefs and cultural identity, undermining their sense of self-worth and personal autonomy, leading to severe anxiety, depression, and often lasting Post-Traumatic Stress Disorder (PTSD). The trauma is exacerbated by the systematic stripping away of her fundamental rights and freedoms, as she is forced into a marriage that denies her agency and dignity.¹³⁸

The survivors of FCMs usually endure physical and sexual abuse within their coerced marriages. This abuse serves to further traumatise and disempower them, perpetuating cycles of fear, pain, and emotional distress. The physical violence inflicted upon these women not only causes immediate harm

but also leaves lasting scars, both physical and emotional, that can affect their well-being long after the initial abuse.

Psychological trauma also frequently emerges as a critical consequence in such cases. Survivors of FCM, especially young girls, often take years to recover from the trauma of the FCM, whether they left by choice or were abducted. The manifestation of this trauma may include PTSD, severe sleep disturbances, depression.¹³⁹ The activist who runs a shelter home for girls who are survivors of FCM gave specific examples of a girl who screamed every night for 2 years after her recovery due to nightmares and a case of a 13-year-old girl who was forced into prostitution as a result of FCM and later giving birth without knowing the identity of the father, as she was sexually exploited and abused by multiple men. This survivor was later diagnosed with anaemia, compounding her health issues.¹⁴⁰ In all these cases, their young bodies were not physically ready for childbirth, leading to caesarean births as their bodies were not capable of enduring normal delivery due to the severe trauma.

Socially, these survivors face profound stigmatization and ostracization within their RMCs. Their coerced conversion is often perceived as a betrayal of religious and communal norms, leading to isolation and exclusion from the very support networks that should provide comfort and protection.¹⁴¹

¹³⁷ The LAS conducted the said interview on 03 June 2024

¹³⁸ The LAS conducted the said interviews on 01 June 2024, 03 June 2024, and 11 June 2024

¹³⁹ The LAS conducted the said interview on 21 September 2024

¹⁴⁰ The LAS conducted the said interview on 11 June 2024

¹⁴¹ The LAS conducted the said interviews on 31 May and 11 June 2024

This societal rejection deepens their sense of alienation and despair, compounding the psychological and emotional toll of their ordeal. One of the Key Informants highlighted this point, stating that this social ostracization has terrible psychological impact for the survivors, who have already been through so much trauma, but cannot return to their families and regain the love and support of their community.¹⁴²

PTSD in FCM survivors is often worsened by the lack of family support, which is often influenced by negative media coverage, social pressures and community ostracization. According to an activist working with survivors, family support played a crucial role in one survivor's swift recovery from PTSD.¹⁴³ This is evidenced in one particular case, where the survivor's family's support played a critical role in her recovery. Their ability to play such a role was attributed to two factors: a) there was no media reporting of the incident, and b) the family, being from a highly underprivileged background, had minimal ties to their community, saving them from condemnation. This lack of external pressure allowed the family to care for their daughter without any victim-blaming, resulting in the survivor, who initially showed clear signs of PTSD, beginning her recovery within a month. In contrast, several other FCM cases revealed families were unable or unwilling to participate in the recovery process due to societal pressure and lack of support to their daughters from the community.

Additionally, the loss of community trust and support further isolates these women, leaving them vulnerable to continued abuse and exploitation within their marital and social contexts. The stigma attached to their coerced conversion can prevent them from seeking help or support, as they fear judgement and condemnation from their peers and community leaders. This isolation not only exacerbates their trauma but also perpetuates a cycle of silence and suffering, making it difficult for them to break free from the oppressive circumstances imposed upon them.¹⁴⁴

As noted by a faith leader, these survivors continue to face stigma upon their recovery within their communities and the Pakistani society at large.¹⁴⁵ As he noted, the lives of these girls are ruined as they encounter significant hurdles in securing favourable marriage proposals in the future. Consequently, survivors frequently struggle to find suitable partners for themselves. In such cases, their relatives may intervene, with examples including aunts' sons making personal 'sacrifices' by marrying these survivors to restore the family's 'honour' and reintegrate the 'disgraced' girl, as outsiders are generally unwilling to consider marriage with them.¹⁴⁶

Further, the families of survivors face disruptive impacts of FCM, as evident from KIs. In one of the cases of a survivor, the FCM resulted in complete disintegration of her familial structure. Similarly, another survivor's family encountered the daunting challenge of rebuilding their lives from scratch, encompassing the search for new employment, securing education for their children, and finding housing. This process of starting over highlights the extensive upheaval and

¹⁴² The LAS conducted the said interview on 31 May 2024

¹⁴³ The LAS conducted the said interview on 21 September 2024

¹⁴⁴ The LAS conducted the said interview on 11 June 2024

¹⁴⁵ The LAS conducted the said interview on 06 June 2024

¹⁴⁶ The LAS conducted the said interview on 06 June 2024

instability induced by FCM.¹⁴⁷ Another case evidenced the forced relocation of the survivor's family from an urban to a rural setting, not only disrupting their established employment and educational opportunities but also forced them to abandon a well-functioning life. The move led to a loss of access to quality education for their children and to good job prospects for both parents. This shift from a stable, prosperous life to a significantly less advantageous situation shows the extensive and multifaceted damage that FCM can inflict on families.

5.2. Religious Minority Communities

FCMs also have significant implications for RMCs communities as a whole in Pakistan, extending beyond the immediate impact on individual survivors, including effect on community cohesion and trust. These incidents undermine the very fabric of community solidarity and cultural heritage, as members grapple with the erosion of their religious practices and beliefs. The coercive nature of these conversions not only fractures communal trust but also instils a pervasive fear among community members regarding the safety and integrity of their religious identity.¹⁴⁹ This has the immediate result of restrictions placed on girls including their education, movement outside the home, and often child marriages to avoid them being abducted or exploited by men.¹⁵⁰

Demographically, FCs disrupt the balance within RMCs, posing a threat to their cultural continuity and long-term survival.

As individuals are coerced into renouncing their religious beliefs, the community's ability to sustain its traditions and pass down cultural heritage to future generations is compromised. This demographic shift weakens the community's collective resilience and diminishes its capacity to preserve its distinct identity amid pressures to conform to dominant religious norms.

Furthermore, the prevalence of FCMs exacerbates the vulnerability of RMCs, particularly impacting women and girls, the main targets. The pervasive fear of abduction, coercion, and FC creates an atmosphere of insecurity where community members, especially women, feel increasingly marginalized and at risk. This climate of fear not only restricts their freedom of religious expression but also limits their social and economic opportunities, perpetuating cycles of discrimination and exclusion within Pakistani society.

5.3. Pakistani Society

At the broader societal level, FCM in Pakistan contribute significantly to systemic issues and deepen societal divisions. The weak enforcement of laws against FCMs not only violates the rule of law but also erodes public trust in legal institutions, undermining their legitimacy and effectiveness.¹⁵¹ This lack of enforcement perpetuates a cycle of impunity for perpetrators, emboldening them to continue exploiting vulnerable individuals

¹⁴⁷ The LAS conducted the said interview on 03 June 2024

¹⁴⁸ The LAS conducted the said interview on 11 June 2024

¹⁴⁹ Ibid (n 27)

¹⁵⁰ The LAS conducted the said interviews on 06 June 2024 and 11 June 2024

¹⁵¹ Voice for Justice and Jubilee Campaign. (2022, November). Conversion without Consent: A Report on the Abductions, Forced Conversions, and Forced Marriages of Christian Girls and Women in Pakistan, Pages 1-61, Available at: <<https://jubileecampaign.org/wp-content/uploads/2022/12/VFJ-NOV-2022-REPORT.pdf> >

¹⁵² Bhattacharya, Sanchita. (2020, April). Violence on Women: An 'Acceptable' Assertion in Pakistan, The Journal of International Issues, Volume No. 24, Issue No. 2, Pages 142-158

Human rights violations are abundantly evident in cases of FCM. These incidents underscore glaring gaps in legal protections for minority rights and women's rights, highlighting systemic failures in safeguarding fundamental freedoms. The persistent disregard for these rights creates a climate of impunity where perpetrators operate with minimal accountability, exacerbating the vulnerability of marginalised communities.

Intercommunal tensions escalate as FCs fuel polarisation and hostility between religious groups. The exploitation of religious differences to coerce conversions deepens mistrust and division, hindering efforts towards social cohesion and religious tolerance.¹⁵³ These are all underlined with the invisible fear of blasphemy cases on the survivors and their families, leaving them reluctant or fearful of retribution for challenging FCM.¹⁵⁴ Incidents exacerbate existing social fractures, heightening communal insecurity and undermining initiatives aimed at fostering mutual understanding and peaceful coexistence.

¹⁵³ Ibid (n 164), Page 153

¹⁵⁴ Ibid (n 164), Page 155

The background of the page is a close-up, high-contrast photograph of a woman's face, focusing on her eyes and forehead. The image has a warm, orange-red tint. Overlaid on the left side of the face is a large, dark blue silhouette of a dove in flight, facing right. The dove's wings are spread, and its tail is visible. The overall composition is artistic and evocative, suggesting themes of peace, vulnerability, and the human impact of the issues discussed in the report.

“

Exploited by Faith

Forced Conversion through Marriage is more than physical—it’s psychological, emotional, and economic violence. Perpetrators exploit the vulnerabilities of religious minorities for control.

6. CONCLUSION

FCM in Pakistan represents a complex and deeply entrenched issue with far-reaching implications for individual survivors, RMCs, and society at large. Despite the lack of standardised data collection and official figures, anecdotal evidence highlights the severe impact of these practices, underscoring the need for urgent and comprehensive intervention.

Firstly, the absence of a formal conversion mechanism and proper record-keeping exacerbates the predicament. Without these safeguards, it is challenging to monitor and ensure that conversions are voluntary and conducted for legitimate reasons. FCM is not solely a physical act but encompasses psychological, emotional, and economic violence. Perpetrators exploit the vulnerabilities of RMC members, manipulating them through their minority status to achieve their desired outcomes.

Addressing FCM requires differentiated protocols for adults and children, especially in determining when the offence begins whether it is at the moment of removal from parental custody, when consent is compromised, or at the point of FM or conversion. This differentiation is crucial for addressing jurisdictional complexities, particularly in cases where survivors are taken across provincial lines for marriage.

The drivers of FCM are multifaceted, encompassing both the motivations of perpetrators and the vulnerabilities of survivors. Perpetrators may be driven by religious beliefs or a sense of duty to convert others to Islam, ideological indoctrination, a desire for sexual domination, a belief in impunity, or trafficking. Survivors' vulnerabilities are rooted in patriarchal norms,

economic marginalization, and their status as members of RMCs, which often limits their educational and social awareness and leaves them susceptible to exploitation.

The impacts of FCM are profound and enduring. For individual survivors, typically girls or women from religious minority backgrounds, FCM results in severe psychological trauma, including anxiety, depression, and PTSD. They also endure physical and sexual abuse within coerced marriages and face stigmatization and ostracization from their communities, exacerbating their sense of isolation and despair.

Within RMCs, FCM undermines community cohesion and trust, disrupts demographic balance, and heightens vulnerability, particularly among women and girls. This atmosphere of fear and insecurity further marginalizes these communities, impeding their ability to maintain their cultural and religious identity.

At the broader societal level, FCM contributes to systemic issues and deepens societal divisions. The weak enforcement of laws against FCs undermines the rule of law and exacerbates distrust in legal institutions. These human rights violations highlight significant gaps in protections for religious minorities and women's rights. Additionally, FCM fuels intercommunal tensions, polarising communities and hindering efforts toward social harmony and religious tolerance.

Addressing FCM necessitates comprehensive legal reforms, effective enforcement mechanisms, and proactive measures to protect religious minorities and uphold human rights. Promoting interfaith dialogue, fostering

inclusive policies, and empowering marginalized communities are essential steps toward building a more just and tolerant society in Pakistan. Such measures can ensure that every individual, regardless of their religious or cultural background, can live free from coercion, discrimination, and fear.

Combating FCM in Pakistan requires a multifaceted approach that addresses both the systemic drivers and the immediate consequences of these practices. By strengthening legal frameworks, enhancing protective measures, and fostering a culture of tolerance and respect for diversity, Pakistan can work towards eliminating FCs through marriage and ensuring the rights and dignity of all its citizens.

“Forced conversion marriages in Pakistan are not isolated incidents but a systemic violation of human rights that erodes the dignity of survivors, fractures minority communities, and weakens the social fabric of the nation. Combating this practice requires more than legal reforms; it demands a cultural shift toward tolerance, accountability, and respect for every individual’s right to choose their faith and future freely.”



“

Justice, Freedom, Faith

Ending Forced Conversion through Marriage requires legal reforms, community protection, and empowering vulnerable minorities to reclaim their freedom and dignity.

7. RECOMMENDATIONS

7.1. Formal Processes and Mechanisms to be Established for Conversion and Certification of Conversion

Responsibility of the Courts

The courts must ensure that religious conversions, particularly in cases of marriage involving females, are voluntary. The Area Magistrate or District and Sessions Judge should verify the voluntariness of the conversion by issuing notices and hearing all concerned parties, including the parents and/or spouse for adults, family members and others of the community. During this process, the alleged convert should be placed in a state-run shelter for children or adults based on their age and permitted to meet only those they voluntarily wish to, under the supervision of a competent officer.

If a complaint or FIR is filed by the parents, or credible documentation suggests that the alleged convert is a minor, the Child Protection Authority must be authorised to facilitate the child and he or she should be placed in a Child Protection Institute, as defined under the Child Marriage Restraint Rules 2016, and allowed to meet their parents under supervised conditions.¹⁵⁵

Importantly, no legal weight should be given to a Conversion of Faith certificate issued by any cleric or institution unless approved by the court. Such certificates should not be used to determine the age of the alleged convert or validate a marriage that is otherwise disputed or challenged before a competent forum.

To ensure transparency and safeguard

voluntariness, a standardized procedure and certification for religious conversions must be developed and legally notified. This procedure should require official certification by an independent state body, including assessments of the voluntary nature of the conversion, understanding of its implications, and mandatory record-keeping, particularly in cases of conversions related to marriage.

Different Protocols for Adults and Children

Implement clear, differentiated legal protocols for conversions and marriages, involving adults and minors. Define the point at which FCM is considered to begin, whether at the moment of abduction, compromise of consent, or forced marriage.

7.2. Improvement of Criminal Justice System with an Emphasis on Sensitization of CJS Actors

Strengthening of Rule of Law

Ensure the rigorous enforcement of existing laws that protect religious minorities and prosecute perpetrators of FCM. Address gaps in legal protections for religious freedom and women's rights to restore trust in legal institutions.

Reforming of Legal Frameworks

Reform existing laws to explicitly address FCM, ensuring that coercion, abduction, and forced conversions are criminalized. Enhance laws protecting religious minorities and women from exploitation.

¹⁵⁵ The Sindh Child Marriage Restraint Rules, 2016, Rule 2

Notification of Specialized FCM Investigation Officers

Introducing Specialized FCM Investigation Officers to handle FCM cases would ensure a more sensitive and informed approach to these complex issues. These officers, trained to understand the unique cultural and religious dynamics involved, would help protect survivors' rights and ensure more thorough investigations. Their presence could also promote trust among minority communities towards law enforcement institutions, encouraging more survivors to come forward. These may also be assigned to the Special Sexual Offences Investigating Units established under the Anti-Rape (Investigation and Trial) Act, 2021.¹⁶⁸

Increase Sensitization Trainings of CJS Actors

Increasing sensitization training for CJS Actors is critical to address cases of FCM effectively. These specialized trainings should encompass several key areas:

First, **survivor protection** must be a primary focus, where police, lawyers, prosecutors, and judges are trained to understand the unique vulnerabilities of FCM survivors. A survivor-centred approach is essential, emphasizing the safety, dignity, and rights of survivors throughout the legal process. CJS Actors should be able to recognize signs of coercion, understand the power imbalances inherent in forced marriages, and ensure appropriate protection mechanisms are in place.

Second, there must be a strong emphasis on **psychological trauma awareness**. Survivors often endure significant emotional and mental harm, stemming not only from the forced marriage itself but also from religious

conversion and isolation. CJS Actors should be equipped to handle these cases with sensitivity to the survivor's psychological state, refer them to support services, and create environments-especially the courtroom-that reduce the risk of retraumatization.

Third, **religious minority sensitivity** is vital. Survivors of FCM often come from religious minority groups, making them particularly vulnerable to discrimination. Training must help CJS actors understand the cultural and religious contexts surrounding these communities, equipping them to approach cases with greater empathy and fairness while understanding the specific challenges faced by minority survivors.

Lastly, **legal knowledge and case management** specific to FCM is necessary. CJS Actors must be well-versed in the legal complexities of FCM cases, including issues of consent, forced conversion, and the legal status of marriages conducted under coercion. Specialized training will help them apply the law effectively while ensuring survivors' rights are fully protected.

7.3. Influence Social and Political Narratives Through Education, Awareness, and Dialogue

Address Root Cause

Tackle the systemic drivers of FCM, including economic marginalization, patriarchal norms, and extremist ideologies. Engage community leaders and civil society in efforts to dismantle the structures that perpetuate FCM.

Empower RMCs

Invest in socio-economic development initiatives for RMCs to reduce vulnerabilities. Focus on increasing educational, economic and

Focus on increasing educational, economic and mobility opportunities, particularly for women and girls.

Raise Public Awareness and Education

Initiate awareness campaigns to educate and sensitize the public, especially within minority communities, on their legal rights and protections against FCM. Focus on empowering religious minorities through education and social programs.

Interfaith Dialogue and Tolerance Promotion

Promote interfaith dialogue and religious tolerance through community engagement programs. Foster inclusive policies that support cultural and religious diversity.

7.4. Rehabilitation of the Survivors and Support from Government Institutions

Survivor Support and Rehabilitation

Develop support services for FCM survivors, including psychological counselling, legal aid, safe houses, and reintegration programs. Address the long-term trauma and community ostracization faced by survivors.

Cross-Provincial Coordination

Improve coordination between provincial jurisdictions for cases where victims are taken across provincial lines. Establish protocols for interprovincial cooperation in tracking and resolving FCM cases.

Data Collection and Monitoring

Mandate comprehensive data collection on FCM to accurately assess the scale of the issue. Establish a national database to track conversions and forced marriages, with data

disaggregated by age, gender, and region.

Provincial committees should be established to monitor and address cases of FCM, ensuring a comprehensive and multi-stakeholder approach. These committees should include members from key institutions such as the National and Provincial Commissions on Human Rights, the National and Provincial Commissions on the Rights of the Child, and the National and Provincial Commissions on the Status of Women. Additionally, civil society should have a voice, with two representatives from organizations actively working on FCM issues. To ensure diverse perspectives, male and female representatives of the RMC will be essential, and an Islamic cleric with a reputation for supporting and working with the RMC may also be included as part of the committee. These committees will play a critical role in overseeing the outcomes of cases of FCM with a specific focus on the investigation, prosecution and results and handling of the survivor and issues identified. They should also play a role in identifying what data needs to be collected to provide up-to-date statistics on FCM cases, which will provide valuable data to inform ongoing policy and legal reforms, ultimately contributing to more effective strategies for combating FCM.



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