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CONSTITUTIONAL GUARANTEES FOR RELIGIOUS MINORITIES UNDER ART ICLES 20 AND 36 OF CONSTITUTION OF PAKISTAN: AN ANALYSIS OF IMPLEMENTATION GAPS IN RURAL SINDH

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Abstract

Pakistan is a country where people of different religions have lived together for generations. The constitution of Pakistan, under articles 20 and 36, gives religious minorities the right to freely practice their faith and places a clear responsibility on the state to protect them. These rights are written in the constitution, but the real question is whether these rights are actually given to people in real life. The focus of this study is rural Sindh, particularly Tharparkar, where a large Hindu minority population has lived for centuries. Despite constitutional protections, communities in this region regularly face forced conversions, difficulty accessing courts, weak government response, and social discrimination that nobody seems to be held accountable for. The law says one thing. The ground reality says another. This research looks at both sides the legal framework and the actual situation on the ground. It studies how Pakistani courts have interpreted Articles 20 and 36, what protections exist on paper, and where the system has failed to deliver. Reports from the Human Rights Commission of Pakistan and documented cases of minority rights violations are used to support the analysis. The conclusion this research works toward is not complicated. Pakistan does not lack laws for minority protection. What it lacks is consistent enforcement, institutional responsibility, and genuine political will to make those laws mean something in places like rural Sindh.

INTRODUCTION

When Pakistan was created, protecting the social, cultural, political, and economic rights of its people was one of the most important goals. The founder of the nation, Quaid-e-Azam Muhammad Ali Jinnah, had a clear vision he wanted a country where minorities would be treated as equal citizens and their rights would be fully protected. He expressed this vision powerfully in his historic speech to the first Constituent Assembly of Pakistan on August 11, 1947 (Bajwa, 1999).in the same speech Jinnah made his position very clear. As Jinnah stated in his address to the Constituent Assembly, "you are

at liberty: you are free to go to your temples, you are free to go to your mosques or another place of your worship in the state of Pakistan" (Rahman, 2016).We are starting with this fundamental principle that we are all citizens and equal inhabitants of Pakistan (Khan, 2023). Every society has rules and laws to maintain order and protect its people.

These laws also help preserve culture and civilization. Legal institutions exist to make sure that everyone's constitutional rights are protected equally. However, when it comes to minorities in Sindh, particularly the Hindu community referred to as scheduled castes in Pakistan's Constitution the reality is very different. There are serious concerns about how this community is treated. Their constitutional rights are often not properly protected. Their social and economic conditions remain poor. Cases of forced conversions continue to happen. And because of all these problems, many Hindus from Sindh have chosen to migrate to India in search of a better and safer life.(Hussain, 2021). Article 20 gives every citizen the right to freely profess, practice, and propagate their religion. Article 36 places a direct obligation on the state to protect the legitimate rights and interests of minorities and ensure their fair representation in public services. Together, these provisions reflect the constitutional idea that religious identity should not determine the quality of one's citizenship

RESEARCH QUESTION

- What constitutional guarantees do Articles 20 and 36 of the Constitution of Pakistan provide for religious minorities?
- What are the key challenges faced by religious minorities in rural Sindh, including forced conversions, social discrimination, and lack of access to justice?
- What is the gap between the constitutional protections on paper and the actual situation of religious minorities in rural Sindh?
- What legislative and institutional measures exist to protect minorities, and how effective have they been in practice?

LITERATURE REVIEW

Population by religion

Administrative Unit	Muslim	Christian	Hindu	Qadiani	Scheduled Others	Others
artpakistan	96.4%-96.5%	1.37%	2.17%	0.07%	0.56%	0.11%

Census report 2026

Constitutional framework for the rights of minorities in Pakistan

The constitution of Pakistan includes several provisions to protect rights on minorities in Pakistan.

- Article 20 grants every citizen the right to profess, practice and propagate their religion.it also allows every religious denomination the right to establish maintain and manage religious institution.
- Article 21 ensures that No person shall be compelled to pay any special tax for the promotion or maintenance of any religion other than their own.
- Article 22 It ensures that no person attending any educational institution is required to receive religious instruction or take part in any religious worship if it relates to a religion other than their own. It also states that no citizen can be denied admission to any educational institution receiving public funds on the basis of religion, race, caste, or place of birth.
- Article 25 ensures that all citizens are equal before the law and are entitled to equal protection of the law. It prohibits discrimination on the basis of sex and guarantees the protection of women and children.
- Article 26 ensures that no citizen shall be denied access to public places on grounds of religion, race, caste, or place of birth.

- Article 27 prohibits discrimination in service appointments based on race, religion, caste, sex, residence, or place of birth, except where these factors are a necessary condition for a specific service.
- Article 28 allows any section of citizens with a distinct language, script, or culture to preserve and promote it and to establish institutions for that purpose.
- Article 36 says that the state is responsible for safeguarding the legitimate rights and interests of minorities, including ensuring their due representation in the Federal and Provincial services.

JUDICIAL INTEPRETATION

Article 25 guarantees equal rights for all citizens regardless of sex, race, religion, or caste. In **Gul Sher v. Additional Sessions Judge Bhowana** the court reaffirmed that the state must actively protect minorities and ensure their full participation in society. Articles 20, 21, and 22 protect religious freedom. No citizen can be forced to follow another religion, pay taxes for it, or receive religious education against their will. In **Church Missionary Trust Association v. Federation of Pakistan**, the court recognized that even Islamic law historically gave non-Muslim communities the right to manage their own affairs. Article 36 requires the state to protect minority rights and ensure their fair representation in government jobs. However, the **Sindh Public Service Commission case** exposed that quota systems for minorities were not being properly implemented. The Preamble and Articles 9, 14, 18, 26, and 27 guarantee minorities the right to life, dignity, freedom of movement, and equal employment. In **Workers' Party Pakistan v. Federation of Pakistan**, the Supreme Court confirmed that these rights apply equally to minorities.

THE JUDICIAL INTERPRETATION AND ENFORCEMENT OF ARTICLE 20 OF CONSTITUTION OF PAKISTAN

Article 20 of Pakistan's Constitution gives every citizen the right to freely follow, practice, and spread their religion. In **Bismillah Din v. Government of Khyber Pakhtunkhwa,** the Peshawar High Court confirmed that every citizen has full religious freedom, and religious groups have the right to run their own institutions. In **Mubarik Ali Babar v. Punjab Public Service Commission,** the Supreme Court highlighted that minority rights, including religious freedom, are protected under multiple constitutional articles together, not just one. In **Jurists Foundation v. Federal Government,** the Supreme Court stressed that constitutional rights, including religious freedom, must be interpreted broadly and progressively to protect individual and collective liberties.

MINORITIES' RIGHTS UNDER ISLAM

There are many claims in Western countries that non-Muslims are mistreated in Pakistan. Non-Muslims say they face discrimination because of their religion. But if we actually look at what Islam teaches about the rights of minorities, these claims don't hold up. Islam does not discriminate against anyone based on caste, color, religion, or background. It promotes unity and brotherhood among people of all faiths, and gives everyone the freedom to follow their own religion. The Holy Quran says that "There is no compulsion in religion," and the Prophets of Islam said,

"Unto you your religion, and unto me my religion."(Sandeep, 2023), When the Holy Prophet (PBUH) established the first Islamic state in Medina; he gave complete religious freedom to all minorities. He made it clear that they would have equal rights and the same opportunities to live a peaceful and happy life just like everyone else (singh, 2007). Non-Muslims were welcome to settle in Medina freely. They were given full political rights, including the right to vote, just like everyone else no difference at all. And even in his final moments, the Holy Prophet (PBUH) reminded his followers to always protect and take care of non-Muslims (Ali, 1980).

FORCED CONVERSION

One of the most serious problems facing the Hindu community in Pakistan is the forced conversion of young Hindu girls to Islam. According to some estimates, around 1,000 such conversions happen every year (sarfraz, 2019). In some cases, young Hindu girls are taken by powerful landlords as payment for debts owed by their parents who work as farmworkers. Authorities usually ignore such situations. In one reported case, a landlord took a Hindu girl from a farm worker's family and falsely claimed she was compensation for a $1,000 debt her family owed him. Certain influential figures are known to actively support forced conversions, including politician Abdul Haqq (known as Mitthu Mian), Pir Ayub Jan Sirhindi who runs the Dargah Pir Sarhandi in Umerkot, and the caretaker of Bharachundi Sharif Dargah in Ghotki district. These individuals are said to have the support and protection of ruling political parties in Sindh (Quratulain, 2017).

According to the Pakistan Hindu Council (PHC) and the National Commission of Justice and Peace (NCJP), around 1,000 non-Muslim minority women are forcefully converted to Islam and married to Muslim men every year. This practice is especially common in districts like Mirpur Khas, Umerkot, and Tharparkar in Sindh. Courts have occasionally intervened. In the Huma Younus case (2020), a Pakistani court ordered the return of a 14-year-old Christian girl who had been allegedly converted and married without her family's consent, recognizing that forced conversion violates fundamental rights. Similarly, in the Reena Kumari case (2021), the Sindh High Court took up the matter of a Hindu girl whose conversion was disputed, emphasizing that courts must scrutinize such cases carefully to protect the rights of vulnerable women and girls. In November 2016, the Sindh Assembly unanimously passed a bill to stop forced conversions. However, several Islamic political parties, including Jamaat-e-Islami, successfully blocked this bill from becoming law (but & bajwa, 2025)

RESEARCH GAP

Most existing studies on minority rights in Pakistan focus either on the national level or on urban areas, without going deeper into rural regions. Very little research has been done on the ground level realities faced by minorities in rural Sindh, particularly Tharparkar. Previous studies have also tended to focus on one specific community, such as Christians or Ahmadis, or on legal provisions alone. Very few studies have combined a constitutional analysis of Articles 20 and 36 with an examination of how these rights actually work in practice at the local level. Additionally, the intersection of caste, religion, poverty, and forced conversions in rural Sindh has not been adequately explored in existing literature. This research fills that gap by bringing together the legal framework, judicial interpretation, and ground realities of rural Sindh in one study, with a specific focus on what the implementation gap under Articles 20 and 36 means for real people living in places like Tharparkar.

RESEARCH METHODOLOGY

To understand the situation of religious minorities in Pakistan from the time of Partition until today, a qualitative research method was used. It also looks at the constitutional rights given to minorities in Pakistan. To carry out this research properly, different sources of information were consulted. Both primary and secondary data were collected based on what the research required. The sources used include libraries, websites, official documents, statistics, previous research, journal articles, and newspapers. All the collected data was then carefully organized and analyzed to reach meaningful conclusions

DISCUSSION

1. Religious minorities in Pakistan

Pakistan is a Muslim majority country. Since it is an Islamic Republic, minorities make up a very small part of the total population. Out of 212.2 million people (as of 2018), around 97% are Muslim, while only about 3% follow other religions mainly Hinduism and Christianity.

Because of these numbers, minorities naturally have limited representation in social and state matters. On top of that, Pakistan's constitution does not allow a minority member to become President or Prime Minister. Under Article 41(2), only a Muslim who is at least 45 years old and qualified to be a member of the National Assembly can be elected as President of Pakistan (tribune, 2019).

In Pakistan, people generally fall into two groups when it comes to their thinking. Those with a moderate approach believe that Pakistan was built on the idea of equal citizenship for everyone, regardless of religion. On the other hand, those with a conservative approach argue that Pakistan was created purely for the protection and promotion of Islam. When it comes to international human rights, Pakistan has signed several important agreements, including the International Covenant on Civil and Political Rights (ICCPR) and the Universal Declaration of Human Rights (UDHR). However, Pakistan added conditions to most of these treaties, making Islamic law the final authority over them. As a result, the actual impact and scope of these treaties became very limited in practice.

2. Situation of Christians in Pakistan

Pakistan has religious minorities including Christians, Hindus, and Ahmadis, but despite constitutional protections, their situation in reality is very difficult. Christians in Pakistan face serious violence and discrimination. In recent years, they have been targeted in deadly terrorist attacks, including a bombing in Lahore in 2016 that killed over 70 people, mostly women and children who had gathered to celebrate Easter. Blasphemy laws are another major threat. Many Christians have been falsely accused, jailed, and even killed because of these laws. A famous case is that of Asia Bibi,a Christian woman who was sentenced to death for blasphemy and spent years in prison in isolation. In everyday life, Christians are pushed into the lowest level jobs like cleaning and garbage collection. Government job quotas for minorities mostly remain unfilled. Christian women face even more difficulties, including forced marriages and forced conversion.

3. Situation of Hindus in Pakistan

Since the Partition of 1947, the Hindu population in Pakistan has dropped significantly. From nearly 20% before Partition, they now make up only about 1.6% of the total population. Every year, thousands of Hindus leave Pakistan for India due to religious persecution. Most of Pakistan's Hindus live in Sindh, which has traditionally been known for religious tolerance. However, even there, violence and discrimination are increasing. Temples have been attacked, and blasphemy allegations against Hindus have led to violence and even deaths. One of the biggest problems is the forced kidnapping and conversion of Hindu women and girls to Islam. Human rights activists estimate around 300 such cases happen every year, and the actual number is likely even higher since many cases go unreported. This problem is especially serious in Sindh.

A member of the National Assembly from Umerkot district, Lal Chand Malhi, highlighted that forced conversions are routine in the region and called for a formal reporting mechanism to properly record the scale of the issue. Similarly, in Ghotki, Sindh, a blasphemy allegation against a Hindu man in July 2016 led to the shooting of two Hindu men the following day, one of whom was a 17-year-old who later died from his injuries. To address this, the government passed the Hindu Marriage Act in 2016, which is expected to give Hindu women better legal protection. Besides violence, Hindus also face discrimination in education and employment. Their lands and places of worship are often targeted for property development. Many from the Dalit community are trapped in bonded labor. Overall, Pakistan's Hindu minority continues to face serious threats to their safety, freedom, and basic rights.

4. Constitutional guarantee for religious minorities: a myth or reality

Despite constitutional guarantees, the ground reality for minorities in Pakistan is very different.

Religious freedom is promised on paper, but several laws actually limit it. For example, Section 298-C of the PPC completely bans the Ahmadi community from practicing or preaching their faith. Since 1984, they are not even allowed to hold a religious gathering, which was previously permitted. Extremist attacks on minority places of worship are also common. A historic Buddha statue in Swat was destroyed by extremists in 2007, and a Christian bookshop in Karachi was raided by police in 2005.Blasphemy laws are used as a weapon to silence minorities. Even educated people like scholars, professors, and journalists have been falsely accused under these laws. Minority women are especially vulnerable in this male dominated society.

Minority families are often harassed by powerful Muslim landlords. For example, a Christian family in Gojra was booked in multiple false cases by influential local Muslims. The education system is another serious problem. School and college textbooks contain biased content that promotes prejudice against non-Muslim religions. Islamic Studies is compulsory for all students, and non-Muslim students who choose Ethics as an alternative are often singled out and face more discrimination. Students who memorize the Quran get 20 extra marks in an admission, which further puts non-Muslims at a disadvantage. In short, non-Muslims in Pakistan face serious problems in almost every area of life, which directly contradicts what the constitution promises them.

5. Socio-economic Status of Minority Communities in Sindh

The socio-economic condition of minorities in Sindh is largely determined by the caste system. Upper caste minorities generally live comfortable and respected lives, while lower caste minorities struggle with extreme poverty and lack access to basic necessities like food, shelter, healthcare, and education. Communities like Oad and Baagri are among the poorest due to their caste status. Lower caste Hindus are spread across Sindh, but almost none of them enjoy the basic facilities that upper caste minorities take for granted. Their conditions are getting worse day by day due to unequal distribution of resources and lack of opportunities. To improve the situation, the Sindh Assembly has passed some important laws. The Sindh Protection of Communal Properties of Minorities Act 2013 protects the property rights of minorities. The Hindu Marriage Act 2016 protects the social and marriage rights of Hindus in Sindh. These laws have brought some positive change and helped reduce discrimination based on caste and religion to some extent. However, the overall situation still needs a lot of improvement. Poverty has no religion, but the caste system remains a major reason why so many minorities in Sindh continue to suffer from deprivation and inequality.

6. Suppression of Minority Political Participation

The Pakistani government has taken several measures to reduce the political participation of minorities, particularly the Ahmadi community. Since 1974, Ahmadis have been officially declared non-Muslims by the state. In 1985, a separate voters list was introduced for them, which required Ahmadis to officially declare themselves as non-Muslims in order to register as voters. This put them in an impossible situation either deny their own faith or lose their right to vote. As a result, only 167,000 Ahmadis registered as voters in the 2018 elections, even though their total population in Pakistan exceeds 500,000. This means a huge number of Ahmadis were effectively excluded from the political process. Such discriminatory laws and policies have seriously reduced the voting power of minorities and their overall participation in Pakistan's political system.(Charan & mahesar,2018)

7. Laws and Policies Relating to Minorities

Pakistan's constitution places Islam at the center of state law, which has created serious problems for religious minorities. While the constitution does promise freedom of religion and speech, in

practice these rights are heavily restricted. Several laws have made life very difficult for minorities. The Second Amendment of 1974 officially declared Ahmadis as non-Muslims. Then in 1984, Ordinance XX banned all religious activities of the Ahmadi community, declaring them anti-Islamic. The blasphemy laws under Sections 295-B and 295-C made it a punishable offence to say anything against the Holy Prophet, the Quran, or Islam with penalties ranging from life imprisonment to death. Minorities are the most common victims of these laws, often facing mob violence even before their cases reach a court.

The government has largely failed to protect minorities from extremist violence, and no serious action is taken against those who attack minority communities. However, some positive steps have been taken. In 2001, an ordinance was passed to protect the communal properties of minorities. A National Commission for Minorities was also established. Most importantly, the Protection of Rights of Religious Minorities Act 2020 banned forced conversions and forced marriages, guaranteed freedom of religion, and introduced penalties for hate speech, discrimination, and destruction of minority religious sites overall, while some laws for minority protection exist, the discriminatory legal framework remains the root cause of the suffering of minorities in Pakistan.(Awan, Mumtaz & Ali,2025)

FINDINGS

1. Constitutional Protection Exists but is Not Enforced

Articles 20 and 36 guarantee religious freedom and state protection for minorities, but in practice these rights are rarely enforced, especially in rural Sindh. The gap between law and reality is very wide.

2. Forced Conversions Are a Major Problem

Around 1,000 forced conversions of Hindu women and girls happen every year, especially in districts like Tharparkar, Umerkot, and Mirpur Khas. Despite legislative attempts, no effective law has been passed to stop this.

3. Blasphemy Laws Are Misused

Blasphemy laws are frequently used to target minorities, leading to false accusations, mob violence, and even death sentences. The case of Asia Bibi is the most well-known example.

4. Caste System Worsens Minority Poverty

Lower caste Hindu communities like Oad and Baagri live in extreme poverty without access to basic necessities, making their situation even harder than other minority groups.

5. Education System is Biased

Textbooks promote prejudice against non-Muslim religions. Non-Muslim students face discrimination and are placed at a disadvantage in admissions due to extra marks given for Quran memorization.

6. Some Positive Steps Have Been Taken

Laws like the Hindu Marriage Act 2016 and the Protection of Rights of Religious Minorities Act 2020 are positive developments, but their implementation on the ground remains very weak.

7. The Core Problem is Lack of Political Will

Pakistan does not lack laws. What it lacks is the genuine commitment to enforce them, particularly in rural and marginalized areas like Tharparkar.

CONCLUSION

Pakistan's constitution clearly protects the rights of religious minorities under Articles 20 and 36. Quaid-e-Azam Jinnah also had a clear vision a Pakistan where every citizen would be treated equally, no matter what religion they follow. But the reality today is very different from that vision. This research has shown that minorities in Pakistan, especially in rural Sindh, are not getting the protection the constitution promises them. Forced conversions, blasphemy accusations, discrimination, poverty, and political exclusion are not rare events they happen regularly and affect entire communities.

Whether it is the Hindu community in Tharparkar, Christians facing blasphemy laws, or Ahmadis who cannot even vote freely, the story is the same everywhere. The rights exist on paper but do not reach the people who need them most.

Courts have sometimes taken strong positions in favor of minority rights, and the Sindh Assembly has passed some helpful laws like the Hindu Marriage Act 2016 and the Sindh Protection of Communal Properties Act 2013. The Protection of Rights of Religious Minorities Act 2020 is also a positive step. But passing laws is not enough when those laws are not properly enforced on the ground. Pakistan does not lack laws for minority protection. What it lacks is the will to actually implement them, especially in remote and rural areas where minorities are most vulnerable. For Articles 20 and 36 to have real meaning, Pakistan needs stronger accountability, better representation of minorities in government, and genuine political commitment to treat every citizen equally regardless of their faith. Until that happens, the constitutional guarantees for religious minorities will remain a promise that has not been kept and communities in rural Sindh will continue to wait for the justice the constitution already owes them.

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