

Iram Khalid*
Maqbool Anwar**

Minorities under Constitution(s) of Pakistan

Abstract

Human Rights are the most debatable issue of the recent age. People living around the globe demand their rights being human beings i.e. the rights or facilities without which human beings cannot live a decent and peaceful life. The concept of human rights was given by Islam during 7th century A.D. while in the West it is related to Magna Carta which was signed in England in 1215. Western scholars claim that concept of human rights was given by the west but the fact is that the last sermon of the Holy Prophet is the first charter of Human Rights. In the west complete charter of human rights i.e. "Universal Declaration of Human Rights" was passed by the United Nations' General Assembly in December 1966. In the recent times constitutions of almost all the democratic states guarantee human rights but unfortunately minority rights have not been mentioned clearly. Pakistan is a democratic state where all the citizens have been guaranteed all the fundamental rights irrespective of their caste, color, creed or religion. This research paper elaborates and analyzes western concept of human rights, Islamic concept of human rights, minority rights in Islam as well as rights of minorities under constitution of Pakistan.

Key Words: Human Rights, Minorities, Universal Declaration of Human Rights, Last Sermon of the Holy Prophet, Constitution of Pakistan.

Introduction

The concept of human rights evolved gradually parallel to the development of human beings. It was the result of continuous struggle of countless people from all over the world. It has become most significant issue of the modern human life. These rights are very essential to lead a reasonable and decent life. Some thinkers are of the view that these are natural rights without any type of discrimination, these rights are bestowed by the nature and nature do has a rationale for them. No formal governmental set up has devised them neither some monarch has originated them; they are simply inherent in the nature.¹

According to Islamic perspective, these rights have been guaranteed to man due to his honor and dignity because Islam regards man as "crown of all creations". Many a verses of the Holy Book and a number of the sayings of the Prophet (pbuh) shed light on the significance of human rights.

In 18th century West has witnessed the development of the human rights. Today West is considered to be the champion of human rights. Fundamental

* Prof. Dr. Iram Khalid, Department of Political Science, University of the Punjab, Lahore.

** Maqbool Anwar (Ph.D. Scholar), Department of Political Science, University of the Punjab, Lahore.

Rights are guaranteed by constitutions of all the modern democratic states of the world. But unfortunately, minorities have been neglected i.e. rights of minorities have not been mentioned separately. That is why all minorities living wherever complain against the discriminations, especially in developed part of the world, which known for its efforts in this regard.

In Pakistan several minorities are also residing in different parts. These minorities are guaranteed all their fundamental rights according to Islam. The constitution of Pakistan guarantees freedom of religion to all the citizens of Pakistan. The minorities are free to practice their religion as well as build their worship places.

Western View of Human Rights

According to Encyclopedia of Britannica

“Rights that belong to an individual as a consequence of being human. They refer to a wide continuum of values that are universal in character and in some sense equally claimed for all human beings”.²

The online legal dictionary define human rights as

“Human rights are freedoms established by custom or international agreement that impose standards of conduct on all nations. Human rights are distinct from civil liberties, which are freedoms established by the law of particular state and applied by that state in its own jurisdiction”(Legal Dictionary, 2006).

Online Oxford English Dictionary defines human right as:

“A right which is believed to belong to every person: a flagrant disregard for basic human rights”³

As per explanation of “Protection of Human Rights Act, 1993” following is elaboration of human rights:

“Human rights mean the rights relating to life, liberty, equality and dignity of individual guaranteed by the constitution or embodied in the International Covenants” (Khwaja, 2015, p. 2).

West is well aware of Human Rights since long. It is a new concept which was developed in its clear form during 18th century A.D. Though some thinkers consider Magna Carta (1215) as beginning of the concept of human rights in the west but most of the scholars do not agree with this view. According to them it was only a charter of landlords and funerals. In the 18th century A.D. French Declaration of Rights of Man and of the Citizens August 27, 1789 and Declaration of Independence of American states are considered as the beginning of fundamental human rights in the west. The Declaration of Independence proclaimed by the 13 American colonies on July 04, 1776 reads as:

“we hold these truths to be self evident, that all men are created equal, that they are endowed by their Creator with certain unalienable rights, that among these are life, liberty and the pursuit of Happiness”⁴

Historically human rights are divided into three generations belongs to civil and political rights and is primarily derived from the reformist theories of 17th and

18th century. Rights mentioned in the Articles 2-21 of Universal declaration of Human Rights belong to these rights e.g. freedom from racial and equivalent forms of discrimination; the right to life; liberty, and the security of the person; freedom from slavery or involuntary servitudes; freedom from torture and from cruel, inhuman, or degrading treatment or punishment etc.

These civil and political rights have got so much importance that most of the states of the world have guaranteed these rights to their citizens in their constitutions. Moreover, majority of international conventions and declarations since World War II have adopted these rights.

The second generation of human rights belongs to economic, social, and cultural rights and these rights got importance during early years of 19th century. The rights mentioned in Articles 22-27 of the Universal Declaration of Human Rights belong to this generation e.g. right to social security, right to work and to protection against unemployment, right to education etc.

The third generation rights got recognition during 20th century. This generation of Human Rights includes six claimed rights. Of these first three rights are demands from the third world countries i.e. right to political, economic, social, and cultural self-determination; the right to economic and social development, and the right to participate in and benefit from “the common heritage of mankind”. The other three rights are – the right to peace, the right to a healthy and balanced environment and the right to humanitarian disaster relief⁵

Khawaja (2015) explains, at present human rights having been granted and protect through United Nations Universal Declaration of Human Rights which was adopted by United Nations General Assembly in 1948 and approved in December 1966. Simplified version of the 30 articles of this declaration explains the variety of human rights which cover almost all spheres of the life of a human. This is such an elaborated document which ensures the safety and security of all individuals regardless of their, caste, creed, color, dogmas and regions. if these rights are adopted in true latter and spirit, there would have been no issue of human rights would have been there.

Human Rights in Islam

According to the Muslims, it was Islam who gave the concept of human rights at first i.e. during 7th century A.D. long before the West. The religion of Islam provides a complete pattern of human life in practical manner. Man has been special status and dignity in this universe. Life of a human being is so sacred in Islam that no one is allowed to kill anyone else.

Quran says:

“Who so ever kills a human being (without any reason like) manslaughter or corruption on earth, it is though he had killed all mankind”⁶

Moreover, dignity of man is explained in these words:

“We have conferred dignity on the children of Adam, and borne them over land and sea, and provided for them far above most of our Creations”⁷

All human beings have their rights and it is moral obligation as well as religious duty of all the Muslims to protect the human rights of all the human beings.

As the Holy Prophet (PBUH) said,

“A Muslim is one from whose tongue and hand the Muslims are at peace”

At another occasion he said,

“Slanderers do not enter paradise”⁸

A renowned Islamic thinker and scholar Dr. Tahir-ul- Qadri has defined human rights as

“The human rights are those rights which are given by the Creator (Allah) of the humanity through His Messenger. These rights are immutable but have reciprocal relationship to the duties”⁹

In an Islamic state the rights or privileges of man are given by Allah who has sovereignty all over the Universe. These cannot be changed by anyone else. In Islamic state citizens enjoy private as well as public rights no one is allowed to snatch these rights. Human Rights are integral part of religion in Islam. The last sermon of the Holy Prophet which he delivered on 9th Dhul Hijjah 10 A.H. (632 A.D.) is the first human right charter in the history of man. Chaudhry (1993) elaborates the points related to human rights as under:

“Human blood, property and honour are sacred and inviolable for all”

“He who has any trust with him he should restore it to the person who deposited it with him”

“Beware; no one committing a crime is responsible for it but he himself”

“A Muslim is the brother of the Muslim and they form one brotherhood. Nothing of his brother is lawful for a Muslim except what he himself allows willingly. So you should not oppress one another”

“O people fear Allah concerning women. Verily you have taken them on the security of Allah and have made their persons lawful unto you by words of Allah! Verily you have got certain rights over your women and your women have certain rights over you”

“Allah has ordained to every man the share of his inheritance. The child belongs to the marriage-bed and violator of wedlock shall be stoned”

“Your lives, your property and your honour must be as sacred to one another as this sacred day, in this sacred month, in this sacred town”

“And your slaves! See that you feed them with such food as you eat yourselves; and clothe them with the clothes that you yourselves wear. And if they commit a fault which you are not inclined to forgive, then part with them for they are the servants of Allah and are not to be chastised”

Next day he also added:

“O people! Verily your Lord is one and your father is one. All of you belong to one ancestry of Adam and Adam was created out of clay. There is no superiority for an Arab over a non-Arab and for a non-Arab over an Arab; neither for white over the black nor for the black over the white except in piety”¹⁰

Minorities under Islam

Ali (1980) is of the view that despite the widespread education, enlightenment and constitutional guarantees in most of the states of the world, minorities are neglected and they have to face discrimination in every walk of life.

Though it is considered that secular states guarantee protection to minorities but practically the situation is not like that. Even in America and other developed countries minorities are treated as second class citizens.¹¹

Hamidullah (1987)¹² says Islam has very soft corner towards minorities living in an Islamic state. Islamic law guarantees and protects right to life, property, honour and liberty of conscience, religion all its citizens i.e. Muslims and non-Muslims without any type of discrimination.

In the West much propaganda is being made against Islam about treatment of non-Muslims. It is claimed that non-Muslims are being discriminated on the basis of faith and religion. But if study deeply the teachings of Islam about rights of minorities, this propaganda of West proves to be false.

Islam has forbidden all types of distinctions and discriminations based on race, color, nationality, language or caste. It brings people together purely on human grounds and at the same time grants them full freedom to practice the religion of their choice.¹³

The Quran says;

“There is no compulsion in religion”.¹⁴

It commands the prophet of Islam to tell the non-believers:

“unto you your religion, and unto me my religion”¹⁵

Singh (2007)¹⁶ writes that the first Islamic state established by the Prophet (PBUH) in Madina gave absolute religious freedom to all the minorities. He assured that minorities would get equal opportunities to live their lives happily. Non-Muslims were even allowed to merge into Madina according to their own will. They were given political rights and with respect to election of head of state they had equal right to vote. Even on his death bed, he directed his followers to provide full security to the non-Muslims.

In Islamic state non-Muslims are not only treated with great tolerance but also given highest administrative positions so that they might play their role for the development of the state. They are free to practice their religion and perform their religious obligations, build their worship places and educational institutions so that their children might be educated according to their faith or creed¹⁷

Minority Rights in Pakistan

Pakistan was established on the ideology of Islam. Most of the population in Pakistan was Muslim but non-Muslim minorities were also present in Pakistan. They were anxious about their future. Quaid-i-Azam was fully aware of the fact. So in his first address to the Constituent Assembly on 11 August 1947, special attention was given to the minorities in these words:

“You are free; you are to go to your temples. You are free to go to your mosques or to any other places of worship in this State of Pakistan. You may belong to any religion or caste or creed—that has nothing to do with the business of the State”¹⁸

He further said,

“Now, I think we should keep that in front of us as our ideal and you will find that in course of time Hindus would cease to be Hindus and Muslims would cease to be Muslims, not in the religious sense, because that is the personal faith of each individual, but in the political sense as citizens of the State”¹⁹

After independence, Govt. of India Act, 1935 became with certain adaptations, the working constitution of Pakistan and the Constituent Assembly was given the task of framing future constitution for country. The first step towards it was taken in March 1949, when “Objectives Resolution” was passed. It was considered as foundation stone for the future constitution of the country. It also included guarantee of fundamental rights for all the citizens of Pakistan i.e. Muslims as well as non-Muslims. The citizens were guaranteed their fundamental rights under following provisions:

Wherein the principles of democracy, freedom, equality, tolerance and social justice as enunciated by Islam shall be fully observed.

Wherein adequate provisions shall be made for the minorities to freely profess and practice their religions and develop their cultures.

Wherein adequate provisions shall be made to safeguard the legitimate interests of minorities and depressed and backward classes.

According to this resolution minorities were free to profess and practice any religion and it was duty of the government to protect their interests. They were allowed to enter into government services of Pakistan. On-Muslims and even some Muslim members of the Constituent Assembly wanted Pakistan to be a secular state but constitutional foundation of the country was laid on the principles of Islam and minorities were given all their fundamental rights as guaranteed by Islam.

With the “Objectives Resolution” the process of constitution making started off. After passage of this resolution in 1949, several committees were framed by the Constituent Assembly to frame a constitution on the basis of principles laid down by the resolution. Among these committees “The Basic Principles Committee” was the most important. It consisted of twenty four members and was headed by the prime minister. A committee on “Fundamental Rights of the Citizens of Pakistan” and on “Matters relating to Minorities” had been established

by the Assembly in its inaugural session on 12 August 1947. The committee was primarily divided into two sections. One was occupied with the formation of Basic Human Rights and the other section was looking into the rights and protection of the minorities in Pakistan. In 1950, the Constituent Assembly adopted the reports devised by this committee, which was finalized in 1954.

By virtue of this report presented by the Committee on Human Rights and after its acceptance by the Constituent Assembly in 1950, minorities were granted generous rights as citizens of Pakistan. The fundamental rights were guaranteed to all the citizens of the state i.e. both Muslims and non-Muslims, and included the following provisions:

1. Equality of all citizens before law.
2. Equal protection of all citizens before law.
3. No discrimination on the basis of religion, race, caste, sex, or place of birth.
4. The right to induction in the services of the state.
5. Freedom of speech, conscience, expression, association, profession, occupation, trade, or business.
6. Every community would be allowed to provide religious instructions to the pupils of its own community and personal law of every community was guaranteed.
7. No person would be compelled to pay any special taxes for the propagation of any religion other than his.
8. No discrimination against any community in the matter of exemption from or concession in taxes granted with respect to religious institutions.
9. No discrimination in admission to educational institutions.

The report was highly appreciated both inside as well as outside the Constituent Assembly. With regard to rights of minorities in Pakistan, in its final report, the Constituent Assembly added the following provisions in the fundamental rights.

1. 'Any minority residing in the territory of Pakistan or any part thereof having a distinct language, script, or culture of its own should not be prevented from conserving the same'.
2. 'The state shall not discriminate in granting aid to educational institutions, discriminate against any educational institution merely on the ground that it is mainly mentioned by a religious minority'.
3. 'There shall be a Minister for Minority Affairs both at the centre and in the provinces to look after the interests of the minorities and to see that the safeguards provided in the constitutions for the minorities are duly observed'²⁰

The first constitution of Pakistan was promulgated in 1956; it included all the fundamental rights for all the citizens irrespective of their religion. All the

minorities living in Pakistan were guaranteed all their fundamental rights. Unfortunately this constitution was abrogated in 1958 and new constitution was framed in 1962 which did not include fundamental rights but these were included in the constitution through constitutional amendment afterwards. Unfortunately, this constitution also could not last long and once again a new constitution was framed in 1973, this time by the Assembly elected by the people of Pakistan. This constitution guaranteed all the fundamental rights to all the citizens of Pakistan. Fundamental rights included in all the three constitutions of Pakistan are as follows:

| Nature of Rights | 1956 Constitution | 1962 Constitution | 1973 Constitution |
|--|--|--|--|
| Rights to equality | a) Equality before law. b) Equal protection of the law. c) All duly qualified citizens were eligible for appointment to service of state, irrespective of religion, race, caste, sex, descent or place of birth. | a) Equality before law. b) Equality regarding accessibility to public places. c) Equality of opportunity. | a) Equality before law and entitlement to equal protection of law. b) Equality regarding accessibility to public places. c) Safeguard against discrimination in services. |
| Rights to life and personal liberty | a) Right to life and liberty. b) No punishment for the act which was not punishable when committed. c) The right to apply for a writ of habeas corpus. | a) Right to life and liberty. b) Right to personal freedom: i) Protection against retrospective punishment. ii) Principle of detention and arrest. iii) Principle of preventive detention. | a) Security of person. b) Safeguards as to arrest and detention. c) Right to fair trial. d) Protection against retrospective punishment. e) Protection against double punishment and self incrimination. f) Inviolability of dignity of man etc. |
| Rights to freedom | a) Freedom of speech, expression, association, occupation, and peaceful assembly. b) The right to move freely throughout Pakistan and to reside in any part of the country. c) Freedom of conscience and the right to profess, practice, and propagate any religion, subject to public order and morality. d) Freedom to attend any educational institution and exemption from any kind of tax which could be used for propagation of the religion other than | a) Freedom of speech, assembly, association, movement, religion, trade, profession, etc. | a) Freedom of movement, assembly, association, trade, business or profession, and speech. b) Freedom to profess religion and to manage religious institutions. Safeguard against taxation for purposes of any particular religion. c) Safeguard as to educational institutions in respect of religion, etc. |

| | | | |
|---|---|--|--|
| | one's own. | | |
| Rights to property | a) Freedom of acquisition and disposal of property. b) No person could be deprived of his property without adequate compensation. | a) Freedom to acquire property. b) Right not to be expropriated. c) Right to compensation. | a) Right to acquire, hold and dispose of property in any part of Pakistan. b) No person shall be compulsorily deprived of his property save in accordance with law. |
| Right to culture | | Right to culture etc. | Right to preserve language, script and culture. |
| Social rights | a) Freedom from slavery, servitude, forced labour, torture, or cruel or inhuman treatment or punishment. The practice of untouchability was also declared unlawful. b) No discrimination on grounds of religion, race, caste, sex, or place of birth. | Freedom from slavery, forced labour, and untouchability. | a) Freedom from slavery, forced labour. b) Right to education. c) Right of individual to be dealt with in accordance with law. |
| Protection of fundamental rights | | Right to Constitutional Remedies to protect fundamental rights. | Laws inconsistent with or in derogation of fundamental to be void. |

Source²¹

Source²²

The Rights of Equality

The constitution grants equality of rights. This right is based upon the supremacy of law. It means that minorities living in Pakistan are also provided equal protection of law and all are treated equally without any kind of discrimination. For example, on Friday February 17, 2012 Lahore High Court granted custody of 11 years old girl Amina Tarrar to her non-Muslim mother ruling that a minor girl should live with her mother. The order was passed by Justice Manzoor Ahmad Malik on a petition filed by French national Ingrid Branden Burger seeking the custody of her daughter, Amina, from her ex-husband Razzaq Tarrar, resident of Phalia Tehsil Mandi Bahauddin district.²³

Whosoever qualifies as the citizen of Pakistan stands eligible for all type of public service without any discrimination of religion, race, sex or descent. In the services of state special quota is reserved for the non-Muslim citizens of Pakistan. That is why non-Muslims are serving in all most every walk of life i.e. education, defense, judiciary, bureaucracy, etc. Zafar (2007)²⁴ elaborates they are even given high ranking posts e.g. the first two Chiefs of Army Staff General Frank Walter Messervy and General Sir Douglas Gracy both were non-Muslims. The first three Vice Air Marshals of Pakistan Air Force were also non-Muslims. Another non-Muslim army officer Cecil Chaudhry played a very significant role in Indo-Pakistan war of 1965 and was awarded "Sitara Jurat" award as recognition of his

valuable services. So many non-Muslim are serving in judiciary also. Rana Bhagwandas, was raised to the post of chief justice of Pakistan in 2007. Thousands of non-Muslim are working in education and health care departments. In fact, the first close heart surgery in Pakistan was carried out by a Christian doctor Dr. Donald Bose in 1959. The non-Muslims also get equal opportunities in electronic media and some of them have won great honor for Pakistan. Some of famous non-Muslim personalities are Shabnam, Dr. Durdana Butt, Neelo, **Rachel Gill, Jia Ali, Sunita Marshall, Binita David etc.**

Rights to life and personal liberty

This is one of the most significant of the entire set of basic human rights. It provides foundations to the concept of 'rule of law'. It stands for the sanctity of human life, honour and liberty except in accordance with law i.e. no person can be arrested; detained put under restraint except law authorizes such arrest or restriction. The minorities freely enjoy their right to life and personal liberty.

Rights to freedom

The minorities have freedom of speech, expression, association, occupation, and peaceful assembly. They can fully participate in the political system of Pakistan and have the right to criticize the government. "Pakistan Christian Post" is a Christian daily newspaper in which Christian point of view about the policies of government is presented without any type of fear. So far as the right to freedom of association is concerned the minorities are free to assemble peacefully in any part of the country. They also have the right to move freely throughout Pakistan and to reside in any part of the country. There are so many non-Muslim colonies all over Pakistan and even in the big cities of Pakistan. Freedom of conscience and the right to profess, practice, and propagate any religion, subject to public order and morality. Minorities are free to profess any religion. They are not forced to accept any type of religion. They are also free to build their worship places and perform their religious rituals freely. Even the Muslims participate in their religious festivals. There are so many temples and churches in Pakistan. These worship places of non-Muslims are respected by the Muslims and even protected by the government. The minorities are free to attend any educational institution and have the exemption from any kind of tax which could be used for propagation of the religion other than one's own. There so many Christian educational institutions run by Christians. Students get education of Christianity in these institutions. In Lahore Forman Christian College and University is run by Christians and students from all over Pakistan come here for education. These Christian institutions are run freely without any interference from the government or any other segment of society. There is never any incident of collection of money from the minorities for the propagation of religion other than their own. The minorities are also free to move or reside in any part of the country. Nobody has ever been denied to reside in any part of the country on the basis of caste, color, creed or religion.

Rights to property

The minorities have the freedom of acquisition and disposal of property. They can sale or purchase any property according to their own will. No person can be

deprived of his property without adequate compensation. No discrimination is shown to sale or purchase property from the non-Muslims.

Right to culture

The people residing in any part of the country have the right to preserve their culture. No one is discriminated on the basis of his culture. The Christians living in Punjab and Hindu community of Sindh have never been forced to leave their culture instead the Muslims and the non-Muslims respect each other's cultures.

Social Rights

All the minorities living in Pakistan have protection of social rights. They are given equal social status everywhere in society.

Conclusion

When Pakistan came into being, so much propaganda had been made by its enemies about the future of non-Muslims living in Pakistan. But the Muslims had bitter memories of past in their minds when they had been maltreated in the sub-continent by Hindu majority. Now they did not want to treat non-Muslim in the way the Muslims were treated in the united India before partition. That was why the minorities in Pakistan were given all their fundamental rights in the constitution. Along with these constitutional guarantees of fundamental rights, practical steps were taken by the state and the society for the protection of these rights. As a result, the minorities are able to live their lives according to their religion and culture. Guarantee of fundamental rights proved very helpful for the progress of the country because minorities are playing very vital role in the national progress. Their contribution in every walk of life is visible. The non-Muslim politicians, philosophers, lawyers, judges, bureaucrats, doctors, engineers, teachers all are serving the sacred homeland only because they have freedom of religion, speech, association, thought, profession etc.

References

- ¹ LOC. "A Century of Lawmaking for a New Nation: U.S. Congressional Documents and Debates. ." *Journals of the Continental Congress* 5, (1774-1875): 510.
- ² Weston, Burns H., "Human Rights" <https://www.britannica.com/topic/human-rights>.
- ³ Dictionary, Oxford, "Human Rights" <http://www.oxforddictionaries.com/definition/english/human-right>.
- ⁴ LOC. "A Century of Lawmaking for a New Nation: U.S. Congressional Documents and Debates. ." *Journals of the Continental Congress* 5, (1774-1875): 510.
- ⁵ Weston, Burns H., "Human Rights" <https://www.britannica.com/topic/human-rights>
- ⁶ Quran,5:32
- ⁷ Quran,17:70
- ⁸ William, J. A. *Themes of Islamic Civilization*. Berkley: University of California Press, 1971.
- ⁹ Qadri, T. *Human Rights in Islam*. Lahore: Minhaj-ul-Quran Publications, 2004.
- ¹⁰ Qadri, T. *Human Rights in Islam*. Lahore: Minhaj-ul-Quran Publications, 2004.
- ¹¹ Rasool, P. C. G. *Islam Ka Siasi Nizam*. Lahore: Ilm-o- Irfan Publishers, 2004.
- ¹² Hamidullah, D. M. *Muslim Conduct of State*. Lahore: Noor sons Publishers, 1987.
- ¹³ Chaudhry, M. S. *Human Rights in Islam*. Lahore: H.Y. Printers, 1993.
- ¹⁴ Quran,2:256
- ¹⁵ Quran,109:6
- ¹⁶ Singh, S. K. *Human Rights in Pakistan*. New Delhi: Pentagon Press, 2007.
- ¹⁷ Ali, P. S. *Human Rights in Islam*. Lahore: Aziz Publishers, 1980.
- ¹⁸ Jinnah, Ali. *Jinnah Speeches as Governor-General of Pakistan, 1947-1948*. . Lahore: Sang-e-Meel Publications, 2013.
- ¹⁹ Jinnah, Ali. *Jinnah Speeches as Governor-General of Pakistan, 1947-1948*. . Lahore: Sang-e-Meel Publications, 2013.
- ²⁰ Khan, H. *Constitutional and Political History of Pakistan*. Karachi: Oxford University Press, 2014.
- ²¹ GOP. *Constitution of Islamic Republic of Pakistan* 1956, 1973.
- ²² Haq, M. *An Introduction to Constitution of Pakistan 1962*. Lahore: Noor sons Publishers, 1963.
- ²³ Tribune, the Express. "Custody Row: French Mother Handed Pakistani Daughter." *The Express Tribune*
- ²⁴ Zafar, E. A *Concise History of Pakistani Christians*. Lahore: Humsookhan Publications, 2007.