



**GOVERNMENT OF SINDH  
LABOUR &  
HUMAN RESOURCES DEPARTMENT**

**NOTIFICATION**

**No.SO(L-II)2-33/2017:** In pursuance to the approval of the Competent Authority i.e. Honourable Chief Minister, Sindh, the Government of Sindh is pleased to notify the following "Child Labour Action Plan (CLAP)" to eliminate child labour throughout the province of Sindh:

**ELIMINATION OF CHILD LABOUR IN SINDH – ACTION PLAN**

According to the Sindh Child Labour Survey (2023-24), 10.3% of children aged 5-17 in the province are engaged in child labour. Alarming, 50.4% of these children work in hazardous conditions, including 11.1% in hazardous industries and occupations, 2.2% using hazardous tools, 75.4% working excessive hours, and 20.5% engaged in night work. These figures highlight the gravity of the issue and underscore the urgent need for coordinated and sustained action to protect Sindh's children from exploitation.

Recognizing this challenge, the Government of Sindh, through the Labour & Human Resources Department has formulated the Action Plan to eliminate child labour across the province. The plan adopts a multi-pronged approach that addresses both the root socio-economic causes and the immediate need for rescue, rehabilitation, and reintegration of child labourers. It emphasizes the enforcement of existing legislation, the strengthening of institutional mechanisms, and the promotion of preventive and educational measures.

Through this integrated strategy, combining legal reforms, enforcement, education, and socio-economic support, the Government aims to safeguard children's rights, ensure their access to quality education, and build a future where every child in Sindh can grow and thrive free from exploitation. A snapshot of age and industry wise child labour prevalence in Sindh is given below:

**Age-wise Child Labour**

Age (5-17) 10.3%		Age (5-9) 4.3%		Age (10-13) 13.2%		Age (14-17) 18.5%	
Boys	Girls	Boys	Girls	Boys	Girls	Boys	Girls
13.7	6.6	4.9	3.7	16.3	9.7	27.2	8.4

**Industry-wise Child Labour**

Characteristic/ Industries	Agriculture, forestry & fishing	Manufacturing	Wholesale & retail trade; repair of motor vehicles & motorcycles	Water supply	Construction	Accommodation & food service activities	Activities of households as employers	Other industries
Age (5-17)	55.1	12.4	10.8	7.0	5.5	2.3	1.8	5.2
Age (5-11)	71.9	4.4	5.4	15.2	0.5	0.3	0.6	1.7
Age (12-13)	60.3	13.1	9.8	7.9	1.5	2.0	2.1	3.2
Age (14-17)	42.9	15.4	14.1	2.4	11.2	3.4	2.1	8.5

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## SALIENT FEATURES

The **three-year (2025-28) Plan** contains legal, administrative, and development interventions. Initial funding to execute the plan will be borne by the Government of Sindh, however, for sustainability of the plan donors support will be explored.

## LEGAL INTERVENTIONS

In Sindh, action against child labour is being executed and monitored under The Sindh Prohibition of Employment of Children Act, 2017. In order to align with the international conventions/covenants and constitution of Pakistan, a new law titled "Sindh Labour Code" has been drafted by consolidating, simplification and rationalization of 21 prevailing labour laws including above said laws on child labour in Sindh. The Code is under process of legal vetting and soon will be introduced in Sindh Assembly as a legislative bill for voting. Proposed legal reforms to eliminate child labour are depicted below:

Description	The Sindh Prohibition of Employment of Children Act, 2017	Draft Sindh Labour Code
Minimum Age to Work	Adolescent: a person who has completed his fourteenth but has not completed eighteenth year.	Proposed age as 16 years Young Person
Hazardous Occupation	Restricted for adolescents in 38 listed works or occupations.	Restricted for young persons in 47 listed hazardous occupations.
Disengaging & Rehabilitation	-	Provision is to be added to legally disengage the children from Child Labour in the powers of inspectors of Labour & Human Resources Department and refer them to educational and welfare institutions without consent of legal guardian / parent.
Liabilities and Penalties	<p><b>Section 14 – Penalties</b></p> <p><b>Employment of a Child (Sub-section 3(1)):</b> Punishable with imprisonment up to 6 months, or fine up to Rs. 50,000, or both.</p> <p><b>Employment of a Child in Hazardous Work:</b></p> <ul style="list-style-type: none"><li>• Fine: Rs. 10,000 – Rs. 100,000</li><li>• Imprisonment: Up to 3 years</li></ul> <p><b>Employment of a Child or Adolescent in Worst Forms of Labour:</b></p> <p>Includes:</p> <ul style="list-style-type: none"><li>• Slavery or practices similar to</li></ul>	<ul style="list-style-type: none"><li>o Employer &amp; Parent/Gurdian are equally liable for the offence.</li><li>o Sealing of Establishment for 15 days.</li><li>o Fine: 5-50 penalty units (One = prevailing minimum wage).</li><li>o Imprisonment: 7days to 6 months.</li></ul>

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	<p>slavery (trafficking, debt bondage, forced labour, armed conflict)</p> <ul style="list-style-type: none"> <li>• Prostitution, pornography, or pornographic performances</li> <li>• Illicit activities such as drug production or trafficking <ul style="list-style-type: none"> <li>◦ Fine: Rs. 200,000 – Rs. 1,000,000</li> <li>◦ Imprisonment: 5 – 10 years</li> </ul> </li> </ul> <p><b>Employment of an Adolescent in Violation of Sub-section 3(2):</b></p> <ul style="list-style-type: none"> <li>• Imprisonment: Up to 1 year</li> <li>• Fine: Up to Rs. 75,000</li> <li>• Or both</li> </ul> <p>• <b>Repeat Offence:</b></p> <ul style="list-style-type: none"> <li>◦ <b>Imprisonment:</b> Minimum 1 year – Maximum 15 years</li> </ul> <p>• <b>Other Violations (Administrative Non-compliance):</b></p> <p>Includes:</p> <ul style="list-style-type: none"> <li>◦ Failure to give notice (Section 9)</li> <li>◦ Failure to maintain or falsify registers (Section 11)</li> <li>◦ Failure to produce records or display notices</li> <li>◦ Any other contravention of the Act or Rules</li> </ul> <p><b>Penalty:</b> Simple imprisonment of up to 1 month or fine up to Rs. 10,000, or both</p> <p><b>Section 15 – Abetment</b></p> <ul style="list-style-type: none"> <li>• Anyone who abets an offence under this Act shall be punishable with the same penalty as for the principal offence.</li> <li>• “Abetment” carries the meaning assigned under the Pakistan Penal Code (XLV of 1860).</li> </ul>	
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## ADMINISTRATIVE INTERVENTIONS

A comprehensive action plan has been designed to strengthen the existing mechanism and introduce new initiatives, assigning responsibilities and timelines as follows:

Intervention	Initiative	Responsibility	Timeline
<b>Strengthening Labour Inspection</b>	At present, 141 Labour Inspectors (including 5 female Inspectors) are responsible for overseeing industrial and commercial establishments across Sindh. Out of 212 sanctioned posts, these positions are filled. In accordance with the ILO benchmark of one Inspector per 40,000 workers, a total of 400 Inspectors are required to effectively monitor the province's workforce of approximately 16 million workers (as per the FLS 2020-21). Consequently, 188 additional posts need to be created to meet the required staffing level.  The existing number of Inspectors will be increased (including number of female Inspectors as designated reserved quota).	Labour and Human Resource Department.	December 2026
<b>Strengthening Provincial Committee on Child Labour</b>	School Education and Literacy Department and Home Department will be added included the Provincial Committee on Child Labour.	Labour and Human Resource Department	September 2026
<b>Strengthening District Vigilance Committees (DVCs)</b>	District Vigilance Committees (DVCs) are notified in all 30 districts; monthly meetings are regularly conducted. Online monitoring portal and tracking system for child and bonded labour cases will be developed through Fundamental Principles of Rights on Work (FPRW) /Bonded Labour Unit. The Committees will further be strengthened through reconstitution and funding.  The Deputy Commissioners will also be empowered to initiate actions under Sindh Bonded Labour System (Abolition) Act, 2015 and Rules, 2021.	Labour and Human Resource Department in collaboration with relevant departments and agencies	2025-26
<b>Free and Compulsory Education</b>	The policies currently being implemented or formulated by the School Education and Literacy Department, aimed at addressing out-of-school children (OOSC) and promoting their enrollment in schools.	Labour & HR Dept, in collaboration with School Education and Literacy Department	2025-28





	will be integrated with this Action Plan to streamline the process of disengaging children from child labour.		
<b>Skill Training</b>	The skill development institutions in Sindh and International Institutions will be taken on board to develop the skills of children by providing training for disengaged children.	Labour & HR Dept., in collaboration with relevant department, UNICEF and ILO,	2025-28
<b>Rehabilitation and Partnerships</b>	Child Referral System will be operationalized. MOUs will be signed with Sindh Child Protection Authority and other NGOs in Sindh.  Negotiations are to be initiated with other partners.	Labour & HR Dept., Sindh Child Protection Authority, School Education and Literacy Department.	2025-28
<b>Public Awareness Campaigns</b>	Periodic campaigns are being launched periodically.  Departmental websites and social media activation for awareness (Facebook, Twitter, YouTube, etc.) will be activated.	Labour & HR Dept.	2025-28
<b>Engagement with Public Prosecutors and Judiciary (Including Labour Inspectors and Officers' Capacity Building)</b>	Field offices will develop coordination with relevant judicial officers for speedy trials.  Appointment of focal persons (Deputy Directors, Assistant Directors and Labour Officers at District and Division Level) to follow up prosecutions and guide other inspectors in this regard.  DVCs to monitor performance of prosecutions and results thereof.	Labour & HR Dept, Training Management and Research Wing, SGA&CD Sindh Judicial Academy	2025-28

#### DEVELOPMENT INTERVENTIONS:

Interventions will be made through ongoing and new schemes for rehabilitation, access to quality education and skill development of disengaged child labour as well as Digitalization of Inspection Management System to make a brighter future free of exploitation. Details are as under:

<b>Intervention</b>	<b>Initiative</b>	<b>Responsibility</b>	<b>Timeline</b>
<b>Rehabilitation of Disengaged Children</b>	Avenues will be explored for the establishment of rehabilitation centers in high-prevalence districts. These centers will provide comprehensive services including education, sports, healthcare, and psychological support.	Labour & HR Department,	2025-28



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<b>Developing Comprehensive Monitoring System</b>	Sindh is executing the ADP scheme (ongoing) for launching the Labour Inspection Management System (LIMS) for real-time, geo-tagged inspections, business mapping, and image uploads. It will be being upgraded under the ADP Scheme "Digitalization of Directorate General of Labour" for providing equipment for inspection and vehicles facilities to inspectors.	Labour & HR Department, P&D Department and Finance Department.	2025-26
<b>Decent Work at Brick Kilns</b>	<p>"Decent Work at Brick Kilns" would be ensured through multiple interventions and with the support of development partners to promote enrolment of brick kiln children in schools.</p> <p>Data collection of brick kiln workers and their children for issuing CNICs, B-Forms, and Birth Certificates will be made in collaboration with local government and NADRA.</p>	Labour & HR Department Local Government & Community Development Dept. NADRA	2025-28
<b>Establishment of Rehabilitation Fund</b>	<p>Establishment of Endowment fund with seed money with support of Government, philanthropists, employers and development partners.</p> <p>The Chambers of Commerce and Industries will be approached for the support of children disengaged from child labour through CSR.</p>	Labour & HR Department Finance Department	2025-28

The CLAP reflects the Government of Sindh's firm commitment to address the complex and multifaceted issue of child labour. While commendable progress has been made through existing legislation and various initiatives, significant challenges persist. Socio-economic disparities, weak enforcement mechanisms, and limited public awareness continue to impede substantial and sustainable progress toward the elimination of child labour.

To achieve a conclusive and lasting impact, there is a pressing need for a more comprehensive, robust, and coordinated approach. This entails the stringent enforcement of labour laws, targeted measures to address the root causes of poverty, enhanced access to quality education, and the strengthening of inter-departmental coordination. Furthermore, effective monitoring and evaluation frameworks must be institutionalized to ensure accountability and measure progress.

This CLAP will serve as a provisional and living policy document, intended to steer and reinforce the collective efforts towards the progressive elimination of child labour across the province. It shall remain subject to periodic review and further refinement through broad-



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based consultative processes involving all relevant departments, stakeholders, and development partners, in close collaboration with UNICEF.

A sustained, multi-sectoral, and collaborative effort, encompassing government institutions, civil society organizations, private sector partners, and local communities, is essential to safeguard the rights of children and to build a future free from child labour in Sindh.

(ASSADULLAH ABRO)  
SECRETARY

No.SO(L-II)2-33/2017

KARACHI, DATED 14<sup>th</sup> NOVEMBER, 2025

A copy is forwarded for information and necessary action to the:

1. The Secretary, Ministry of Commerce, Government of Pakistan, Islamabad
2. The Secretary, Ministry of Overseas Pakistanis & Human Resource Development, Government of Pakistan, Islamabad
3. The Chairman, Planning & Development Department, Karachi.
4. The Additional Chief Secretaries, Sindh (all)\_\_\_\_\_.
5. The Secretary, Govt. of the Sindh, (all)\_\_\_\_\_.
6. The Secretary, Govt. of Sindh, Information Department, Karachi for vide publication in the electronic and print media
7. The Managing Director, TEVTA, Sindh, Karachi
8. All the Divisional Commissioners in Sindh
9. All the Deputy Commissioners in Sindh
10. The Director General Labour, Sindh, Karachi
11. The Commissioner, Sindh Employees Social Security Institution, Karachi
12. The CEO, Sindh Workers Welfare Fund, Karachi
13. All Divisional Directors Labour in Sindh
14. The Executive Coordinator, Treaty Implementation Cell, Human Rights Department, Government of Sindh, Karachi
15. The Country Office, International Labour Organization, Islamabad
16. The Country Office, United Nation Children's Fund, Islamabad
17. The Superintendent, Sindh Government Printing Press, Karachi for publication
18. The Deputy Secretary Staff (Staff) to Chief Secretary (Sindh), Karachi
19. The Focal Person, GSP Plus and ILO, Labour & HR Department, Sindh, Karachi
20. PSO to Secretary, Ministry of Overseas Pakistanis & HR Development, Islamabad
21. PSO to Chairman NADRA, Islamabad
22. PS to Minister for Labour & HR & Social Protection Department, Karachi
23. PS to Secretary, Labour & HR Department, Karachi
24. PA to Additional Secretary, Labour & HR Department, Karachi
25. General file



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SECTION OFFICER (L-II)