



## AN ANALYSIS OF FAMILY LAWS OF RELIGIOUS MINORITIES IN PAKISTAN

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*\* This paper is the part of HEC Project under National Research Program for Universities (NRP)  
No:8926/Punjab/ NRP/R&D/HEC/ 2017*

### Abstract

*It is famously narrated that Pakistan came into being as a state for the Muslim minority of India. Nevertheless, Pakistan was also the homeland of many other religious natives such as Christian, Sikhs, Hindus, Parsis, Buddhists. Even many Jews lived in Pakistan who were the natives of this land for centuries before the partition of 1947. All of these religions are completely different from each other and also have their rituals, traditions, language, caste system, creed, ethnicity, marriage, and divorce laws. All of Pakistan's constitutions give minorities equal rights, but when in the 1960s, Pakistan developed its first family laws for Muslims and launched "Nikah Nama", and made other rules and regulations for the majority of its population but forgot about its minorities. Pakistan's minorities suffer under Anglo Hindu Laws and The Christian Marriage Act of 1872 until recently. Pakistan introduced The Sindh Hindu Marriage Act 2016, the Hindu Marriage Act of 2017 Passed by the National Assembly of Pakistan, The Punjab Anand Karaj Marriage Act of 2018 for Sikh nationals, and the Christian Marriage and Divorce Act 2019*



*(still waiting for legislation). This article provides a brief introduction of above mention laws in the context of developments under the rights of religious minorities of the state. For this purpose, qualitative research is being conducted.*

**Keywords:** Hindu, Sikh, Christian, Religious Minorities, Marriage Act

## Introduction

The Islamic Republic of Pakistan is not only the homeland for migrated Muslims of India but for many religious minorities such as Christians, Hindus, Sikhs, Parsis, Buddhists, Jews, and many others, who did not migrate here in 1947 but lived here for centuries. Pakistan is also a holy place of many of these religions, such as Sikhism and Buddhism. The central province of Pakistan, Punjab, is filled with the holy temples of the Sikh religion. Baba Guru Nanak was born and lived here (Nason, 2005). Maharaja Ranjeet Singh also ruled Punjab. This land also belonged to Buddhism and Hinduism long before the arrival of Islam and Christianity. In 712, Muhammad Bin Qasim reached here via Arabian Sea and spread Islamic teachings. After that, in the 18<sup>th</sup> century, the subcontinent of India became a British colony, and Christianity took place here. Zoroastrianism and Judaism also have their prolonged history here. So, when Pakistan's first Governor-General Quaid-e-Azam Muhammad Ali Jinnah gave his very first speech, he said to all natives of Pakistan

*“You are free; you are free 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..... We are starting in the days when there is no discrimination, no distinction between one community and another. We are starting with this between one caste or creed and another. we are starting with this fundamental principle that we are all citizens and equal citizens of one State” (PIPS 2017).*

Islam is the primary religion of the state because it was famously created for the Muslims of the subcontinent of India. At the time of independence, the name of the country was “Pakistan”, but it has become the “Islamic Republic of Pakistan” under its all Constitutions since 1956 (Mustafa, Ahmad and Arslan 2020). However, the natives of this land belonged to many religions, including Islam, Hinduism, Buddhism, Sikhism, Christianity, and others. After the partition and migration of hundreds of thousands of Muslims in the state, natives became the minority of the state because the Muslim Population increased to 96% and other religious minorities remained at 4%. The



Constitution of 1973 gives equal rights to all of its citizens regardless of religion and believes caste and creed, language, and ethnicity, along with the Constitution of 1956 and Constitution of 1962 (Shah, Parveen, Syed, & Kanwal, 2017).

Every religion has its code of conduct and rules to follow, so in Pakistan, many “personal matters” such as marriage and divorce rituals of religious groups are directed by their religious uncodified laws and customs. When India became part of the British colony, the Britishers introduced some laws and regulations about personal matters of Hindus, Sikhs, Parsis, and Christians. “The Christian Marriage Act 1872”, “The Divorce Act 1869” and “Anglo Hindu Laws” were very comprehensively regulated the personal matters of different communities of the state; in 1925, they further gave the “Succession Act” for validation of Christian marriages (Abbasi & Cheema, 2018). “The Anand Marriage Act 1909” was introduced for the Sikh community of India, but this law was not comprehensive. It was a declaration that the Sikh marriage called Anand shall be considered legal in the law. However, this law failed to provide any type of guidance regarding divorce and the rights of wives, widows, and children. In this regard, “the Parsi Marriage and Divorce Act 1936” was very detailed and provided rules and regulations for marriages, divorce, and children’s rights and Parsi Matrimonial Courts. British lawmakers further introduced “the Special Marriage Act 1972” to regulate marriage and divorce who follow a different religion or do not follow any religion.

Unfortunately, Pakistan did not follow the legacy of British lawmakers and religious minorities long waited for the family laws and personal laws. However, Pakistan made its first family laws for Muslims “Muslim Family Laws Ordinance” in 1961 under the General Ayub Khan regime (Punjab, MFLO, 1961).

In 2016, Sindh Assembly passed “the Sindh Hindu Marriage Act 2016”, and National Assembly passed “the Hindu Marriage Act 2017” in Pakistan. 2018, the Punjab assembly Passed “the Anand Karaj Marriage Act 2018” for the Sikh community. Although “the Sindh Hindu Marriage Act 2016” and “the Anand Karaj Marriage Act 2018” basically deals with the registration of the marriage. “the Hindu Marriage Act 2017” deals with the rules of divorce and remarriage of the widows as well as the protection of economic rights of the wives and children upon divorce. In 2019, the government of Pakistan was supposed to purpose the Christian Marriage and Divorce Act, 2019, to replace the “Christian Marriage Act 1872” and the “Divorce Act 1869”, but the Christian community is still waiting for it.

The primary purpose of this article is to find out about the marriage laws of the three significant religious minorities of Pakistan. This article will also provide a broad outlook



of the personal laws of the religious minorities of Pakistan, i-e Hindu, Sikh, and Christian family laws, by summarising essential statutes. It is qualitative research. For this purpose, secondary data will use, such as bills of family laws, news, and articles.

### **Hindu Marriage Acts 2016 & 2017**

Since the creation of the Islamic Republic of Pakistan in 1947, the very first bill of Hindu Marriage was presented in National Assembly (Hindu Marriage Act, 1947). After that, the personal matter of the Hindu community is regulated by the following statutes.

1. The Sindh Hindu Marriage Act 2016
2. The Hindu Marriage Act 2017

Details of these laws are as follows.

#### **1. The Sindh Hindu Marriage Act 2016**

The Sindh Hindu Marriage Act 2016 is the very first law for the Hindu community of the state to register their marriage and attest to their marital unions. It is for the Hindu community who live in the jurisdiction of the Sindh government. The Act describes that the age of bride and groom should not be below eighteen years and ceremony of the wedding must be held as per customs and rituals of Hindu religion as per believes of either party. This Act also elaborates following laws to solemnised the Hindu Marriages.

- i. Both parties of marriage must have free consent.
- ii. Both parties must not be related to each other as per the teaching of the Hindu religion.
- iii. None of the parties should have any spouse exist at the time of the wedding. No second marriage is allowed in Hinduism, so, bride and groom must be unmarried, widowed or divorced at the time of the wedding.
- iv. At the time of solemnisation and registration, there should be at least two witnesses present (Pakistan Patent No. SINDH ACT No. IX OF 2016, 2017).

For registration of marriage, the Act 2016 define that wedding can be registered at Union Council or Municipal Corporation. There is a forty-five days limit to register the marriage after solemnisation. According to the Act, there should be “four copies of marriage form/ certificate, properly filled out and given to the concerned officer; the concerned officer then endorses the marriage certificate”. The concerned officer must have a “marriage register” in which he should lay down the marriage certificates duly signed by him, by the person who solemnised the marriage, by bride and groom, and by the two witnesses (Pakistan Patent No. SINDH ACT No. IX OF 2016, 2017).



“The Act shall also have surveying effect for the registration of marriages solemnised before its commencement, and such marriages should be registered with the concerned officer in accordance with the procedure laid down by Act. The provisions of the Act are to be interpreted to advance the purpose of this Act, i.e. the registration of Hindu marriages, and the provisions of the Act take precedence over the provisions of any other law” (Abbasi & Cheema, 2018).

## **2. The Hindu Marriage Act 2017**

The Hindu Marriage Act 2017 was presented and approved in National Assembly. It is a milestone in the field of law-making for religious minorities. However, this law is applicable for the provinces of KPK, Baluchistan, Punjab and Federal. This Act allows the Hindu community to register their marriages, file their divorces, and claim their inheritance and custody of children. For the province of Sindh, Sindh Hindu Marriage Act 2016 is applicable. The basics of both Hindu Marriage Acts are the same such as

- a) “bride and groom must not below the age of eighteen;
- b) bride and groom parties must have their free will and consent regarding their wedding;
- c) bride and groom must not be related to each other as per preaching of Hinduism;
- d) Moreover, none of the bride and groom has an existing spouse at the time of marriage, but according to Act the Hindu husband can enter into polygamy if his wife medically not able to conceive a child” (Abbasi & Cheema, 2018) (Patent No. AACT No. VII of 2017, 2017).

The Act 2017 also allows the Hindu community to annul their marriage by obtaining the decree of nullity. The Hindu marriage may be voidable on the basis of

- i. If any respondent of the union consumed impotent.
- ii. If the parties are below the age of eighteen years old.
- iii. If the marriage is held without the free consent of any party.
- iv. If the consent of the petitioner is obtained by force or fraud.
- v. If the respondent at the time of marriage was pregnant with the child of another person.

Nevertheless, the annulment is not available if

- i. there been a year after forceful marriage and both live as a spouse.
- ii. Also, without free consent at the time of marriage, both live as a spouse for a year.
- iii. Also, it has been a year after the discovery of fraud which was held at the time of the wedding, but both live as a spouse for a year.



The Hindu Marriage Act 2017 also allowed judicial separation and divorce on the basis of

- i. if the petitioner was treated with cruelty,
- ii. if the either of the party changes their religion to another;
- iii. if the petitioner face negligence from his/her spouse for the period of two years;
- iv. if the respondent has a mental disorder;
- v. if the respondent has an incurable disease or venereal disease;
- vi. if the respondent renounced the world by entering a religious order;
- vii. if both parties resume their relation for the period of one year after judicial separation;
- viii. if the husband is sentenced to imprisonment for the period of four years or more; and
- ix. if the marriage was solemnised before the wife attained the age of eighteen years.

The Hindu Marriage Act 2017 is more comprehensive and cover multiple fields of family laws; on the other hand, the Sindh Hindu Marriage Act 2016 is only concerned with the registration of the marriage. These acts, although not lay down any rules regarding “valid marriage, restitution of conjugal, rights, divorce, remarriage of Hindu widows, legitimacy of children, and the protection of financial rights of wives and children after divorce”.

### **The Punjab Sikh Anand Karaj Marriage Act 2018**

“Pakistan is the first home of the Sikhs, wherever they are in the world”, a seventy years old Indian Sikh yatri (visitor) claimed that (Toppa, 2017). Nowadays, Pakistan has around twenty thousand Sikhs inhabitants, and the majority of them, around seven to eight thousand, live in the province of Punjab. In March 2018, the provincial Assembly of Punjab approved the Sikh Marriage Act with the majority consent under the government of Pakistan Muslim League Nawaz (PML-N). Mr Sardar Ramesh Singh Arora presented the first draft of this Act in October 2017 at the provincial Assembly (Mehmood, 2020).

Sikh family law or the Punjab Sikh Anand Karaj Marriage Act 2018 is an act to provide solemnisation and registration of Sikh marriages. Before this Act, the Anand Karaj Marriage Act 1909 was introduced and make sure Sikh marriage will know as Anand Karaj and would be valid under the law (India Patent No. ACT NO. 7 OF 1909, 1909). The Punjab Sikh Anand Karaj Marriage Act 2018 is for the province of Punjab in Pakistan and will enforce at once. According to this Act, Anand Karaj would refer to a marriage certificate, and the Anand Karaj Registrar will issue it. Anand Karaj also means the “legitimate union of Sikh male and Sikh female which conducted as practices of Sikh religion and mention in Sri Guru Granth Sahib” (Punjab, Anand Karaj Marriage Act 2018, 2018).





The Act also elaborate that at the time of marriage Sikh male and Sikh female are sound-minded and not under the age of eighteen years old; must have free and full consent at the time of marriage; and also both persons must not be related to each other as per the teaching of their religion. If there were any blood kinship relation between the bride and groom, their marriage would be illegal. If the marriage conducts as per Sikh religious customs and registers under the law, nothing can affect the validity of the marriage.

The Punjab Sikh Anand Karaj Marriage Act 2018 states that every Sikh marriage in the province must register under this law. The government will provide the marriage certificate or Anand Karaj certificate to the couple whose marriage is registered just like Nikah Nama, which is provided to the Muslim married couple. Within the thirty days of marriage bride, groom or Granthi (who solemnised the marriage) will fill the Anand Karaj Form and present it and also sent a copy to the chairman. In this regard, the chairman refers to the chairman of the union council or municipal committee. After receiving the Anand Karaj Form, the Anand Karaj Registrar registers the marriage and issue the Anand Karaj Certificate. If marriage is not registered under the 2018 Act, then the bride, groom or Granthi can report it within the thirty days of solemnisation of the marriage.

For the purpose of the dissolution of marriage, the Punjab Sikh Anand Karaj Marriage Act 2018 elaborate that any party have the right to dissolve the marriage. For dissolution of the marriage, any party can give notice to the chairman and copy of notice supply to the other party. After notifying the Chairman, Chairman can constitute the "Arbitration Council" with the purpose of negotiation and reconciliation between both parties. If Arbitration Council fails and within ninety days after the date of the notice, chairman can declare the marriage has been dissolved and issue the "Certificate of the Dissolution of Marriage" (Punjab, Anand Karaj Marriage Act 2018, 2018).

The Punjab Sikh Anand Karaj Marriage Act 2018 revoked the Anand Marriage Act 1909 and its practice in the province of Punjab. MPA Mr Ramesh Singh Arora presented this bill in the Provincial Assembly of Punjab on 14<sup>th</sup> March 2018, approved by the Governor of Punjab on 19<sup>th</sup> March 2018, and published in the Punjab Gazette on 20<sup>th</sup> March 2018 (Mehmood, 2020). Unfortunately, Sikh Marriage Act 2018 passed three years ago but is still not implemented in the province.

Because of the not implementation of the Sikh Anand Karaj Act 2018, the problems of the Sikh community regarding marriage registration as well as issues in divorce are continuing. Sikh marriage does not register, so divorce and the right of children are still unsolved problems. According to a representative of the current government, Mr Sardar



Mahinder Pal, the reason behind not execution is the Covid-19 pandemic (Mehmood, 2020).

The PML-N government passed the Act, and the tenure of the PML-N government was completed in May 2018, so the successor government postponed the application of the Act. According to Mr Mahinder Singh, the representative of the current government, “they are trying to make the rules and implement them all over the province at once, and it could happen by this year”. However, till the enforcement of the Act, Sikh Marriages are registered in Sindh Hindu Marriage Act 2016. He further said we are trying to enforce this Act rest of the provinces, too, for the wellbeing of the Sikh community all over the state.

For the application of the Act 2018 throughout the province, the government registering the many Gurudwaras and Granthis to perform the Sikh marriage, register them in the council and can issue an Anand Karaj Certificate to married couples (Mehmood, 2020). So, this process can take time because of the slow bureaucratic process and a pandemic of the Corona Virus and government negligence. Nevertheless, till the enforcement of the Act 2018 happens, the Sikh community is suffering from the issues of divorce and inheritance.

### **Christian Marriage and Divorce Act 2019**

In 2016 Mr Ameen Masih, a Pakistani national Christian, writ petition in Lahore High Court against the laws of divorce for the Christian community of the state. He said that although the marriage between him and his wife is over, he does not want to accuse his wife of “adultery” for the sake of divorce (Pakistan Patent No. Writ Petition No. 623 of 2016, 2017). He further focused on that he wants to break down his marriage based on Section 7 of the Christian Divorce Act 1869. This section of the Divorce Act allows him to divorce his wife without any allegation of adultery or misconduct under the English Matrimonial Causes Act of 1973 (Solangi, 2017). However, Section 7 of the English Matrimonial Causes Act of 1973 under the Christian Divorce Act 1869 had been omitted from the Act by the Federal Laws Ordinance under General Zia ul Haq regime in 1981 (Bangash, 2019). After that, the ground of divorce between Christian couples pretty much remains on the basis of an allegation of adultery and forced or unforced conversion. Finally, the petitioner argued that the current laws of divorce for the Christian community are not only against fundamental human rights and also pressurise them to lie before the court (under oath) and society about their religious belief or characters of their better halves for the sake of ending their marriages.





This case not only enlightens the critical issues related to the Christian Marriage Act 1872 and the Christian Divorce Act 1869 of the state but also point out that how the laws for the Christian community have not been touched for almost two centuries. This case further shows the suffering of the state's religious community by the negligence of the lawmakers and government. As a result, in this case, the government of PML-N and the current government of PTI started efforts to change these 150 years old laws. For this purpose, the Minister of Human Rights Shireen Mazari proposed the Christian Marriage and Divorce Act 2019 in National Assembly. This Act may repeal and replace the existing Marriage and Divorce Acts of 1872 and 1869.

After few years of colonisation of India, British Lawmakers develop personal laws for the Parsis, Hindus, Muslims and Christians (Abbasi & Cheema, 2018). Although these laws were according to religious statements in specific ways, they were not personal religious laws. For instance, they develop the Christian Marriage Act 1872 and Christian divorce Act 1869 for the tiny but growing Christian community of India. These laws mainly followed British Laws but were recognised by the Church of England, the Church of Scotland, the Catholic church and also allowed native ministers to perform and solemnise Christian marriage. On the other hand, Divorce Act was also representative of English Laws that allow divorce only based on adultery, bigamy, rape, sodomy, bestiality and conversion of spouse towards other religions (Bangash, 2019).

As the judgement of the Ameen Masih case, the Chief Justice of Lahore High Court Mansoor Ali Shah declared that the omission of Section 7 in 1981 by General Ziaul Haq was unconstitutional. Because the General Ziaul Haq regime was undemocratic, and the omission occurred without any discussion with the Churches. So, he allowed Mr Ameen Masih to divorce his wife under Section 7 of the permanent breakdown of the marriage (Pakistan Patent No. Writ Petition No. 623 of 2016, 2017). He further elaborated that he consulted different churches regarding this matter. Furthermore, this "law was a state – that is, a civil – law that regulated the affairs of a religious community. Hence, it was in no way changing Biblical law – as some were alleging – or forcing any church to accept divorce under its provisions" (Patras, 2019).

When the Ameen Masih case opened the eyes of the government so, the government of that time initiated the program to formulate the revisions in pre-existing Acts (Bangash, 2019). Senator of PML-N Kamran Michael started the meetings with different people according to these laws at Islamabad and Lahore. However, the tenure of PML-M was completed by the time and hustle-bustle of elections and new government started. So, as a result, nothing concrete happened until Shireen Mazari, Human Rights Minister of the PTI government, reinitiated the process. Within the year, she consulted with many



Christian leaders and Christian community members regarding the Act. Consequently, the government prepared the first draft of The Christian Marriage and Divorce Act 2019 with the help of leaders of the local Christian community as well as the National Commission for Justice and Peace formed by Bishop Conference 1985 (Bangash, 2019). The proposed Act brought some changes or revisions in the existing Acts. First of all, the Act determined the age of both males and females, which is not below eighteen years. This Act also allows both husband and wife to writ petition of divorce on the basis of numerous grounds and without an allegation of adultery.

Following are the further revisions made by the 2019 Act.

1. At the beginning, the Act defines Christian, which is acceptable by most churches.
2. After definition, Act allows the solemnisation of Christian marriage other than churches. This means the Christian community can perform their marriages wherever they want to, like in marriage halls or at home.
3. Act allows marriage to be registered in the local Union Council and then at National Data Base and Registration Authority (NADRA). The registration of marriages, births and deaths are removed from the Registrar General.
4. As regarding divorce, Act allows all modern reasons for divorce, such as domestic violence. On the basis of human rights, the law is more equitable and women-friendly. Violence is defined as “any offence committed against the human body of the aggrieved person including abetment of an offence, domestic violence, sexual violence, psychological abuse, economic abuse, stalking or a cybercrime.”
5. In the further provision of divorce, the Act allows “lack of understanding, not paying responsibilities towards the spouse, children and family, and matrimonial rights and obligations” as reasons for divorce. This revision is a reflection of Catholic Canon Law.
6. For the annulment of marriage, Act 2019 replace the words of an idiot and lunatic with a mental disorder, which represent a wide range of mental and psychological issues. The Catholic and Anglican Churches also recognise this term.
7. The Act also deals with the issues of “alimony”. The Act allows women to have at least one-fourth of their husband’s income as alimony. Moreover, it can be increased according to the circumstances.



8. And finally, the Act cancels the omission of Section 7 of the Christian Divorce Act 1869 (Bangash, 2019).

The Pakistani government made an outstanding effort to modified the almost 150 years old laws. However, the implementation of this law is the real issue. Just like the constitution of Pakistan gives equal rights to all its citizens but making legislation in favour of citizens is not a real focus of several Pakistani governments. Unfortunately, this much-needed law is still waiting for legislation and implementation and as a result Christian community is still suffering from the lack of laws.

## **Conclusion**

Christians, Hindus and Sikhs are the primary religious minorities of Pakistan who are living in different provinces. The Majority Hindu community live in the province of Sindh. On the other hand majority of, Sikh community belonged to the province of Punjab, but the Christian community lived all over the state. So, different provinces make laws for their communities, such as Anand Karaj Act 2018 developed by the Punjab government and in the same manner Sindh Hindu Marriage Act 2016 developed by the government of Sindh. However, Christian Marriage and Divorce Act were made by Human Right Ministry because this Act is for all the Christian community of the state. Since the independence of Pakistan, not so many laws introduced by the state in favour of religious minorities. In fact, in the regime of General Ziaul Haq, Section 7 of the English Matrimonial Acts was omitted without any consultation. Furthermore, because of it, the Christian community suffered a lot.

The first Anand Karaj Act was firstly developed in 1909. After almost a century Pakistan Punjab government approved the Punjab Anand Karaj Act 2018. The Act 2018 is more comprehensive than the Act of 1909. It covers more fields such as divorce, alimony and remarriage of remarriage. Unfortunately, this law is still waiting for implementation because of the pandemic and slow process of policymaking and legalisation.

The study of Hindu Marriage Acts of 2016 and 2017 shows that now the Hindu citizens of the state can register their marriage, file their divorce and claim their inheritance. These laws can assure the security of their marriages and can stop forceful marriages and force conversion of Hindu girls. These Acts also give confidence and opportunity to the Hindu community to annul their marriages, as well as to file a divorce.



Christians are nearly five per cent of the total population of the state, but the laws regarding the personal matter of this community are unchanged from 150 years. In 2019 current government of the state tried to change them and present The Christian Marriage and Divorce Act 2019 in National Assembly. Ameen Maish case and judgement on it by the Chief Justice of Lahore High Court enlighten the issue. Justice Shah argues that Pakistan is an independent state, so why we are following the laws of another country, he further said that these laws are not against the Biblical laws of this community. So, the state tried and developed the bill and presented it. However, unfortunately, it has been almost two years since this bill has been waiting for legislation. As a result, the Christian community is still suffering from its absence.

These new provisions in the minorities law of Pakistan show the interest of democratic governments in the progress of minorities of the state. These landmark acts are the main steps towards the prosperity of the marginalised community. These laws can make majority-minority relations stronger and can give confidence to the marginalised community to high their voices for their rights. However, the implementation of these laws is still waiting for significant steps towards them.



## References

- Abbasi, M. Z., & Cheema, S. A. (2018). *Family Laws in Pakistan*. Karachi: Oxford University Press.
- Bangash, Y. K. (2019, September 18). *Scroll.in*. Retrieved 29th April, 2021, from [https://scroll.in: https://scroll.in/article/937194/after-150-years-pakistan-is-trying-to-change-the-biased-laws-governing-christians](https://scroll.in/article/937194/after-150-years-pakistan-is-trying-to-change-the-biased-laws-governing-christians)
- Hindu Marriage Act, 2. (2014). *National Assembly*. Retrieved 1st May, 2021, from <http://www.na.gov.pk>:  
[http://www.na.gov.pk/uploads/documents/1393931873\\_197.pdf](http://www.na.gov.pk/uploads/documents/1393931873_197.pdf)  
(1909, 22nd October). *India Patent No. ACT NO. 7 OF 1909*.
- Mehmood, A. (2020, 21st June). *Tribune*. Retrieved 21st April, 2021, from <https://tribune.com.pk>: <https://tribune.com.pk/story/2247045/two-years-sikh-marriage-act-still-awaits-implementation>
- Mustafa, D. G., Ahmad, T., & Arslan, M. (2020). Minorities of Pakistan: An Analytical Analysis of the 1973 Constitution of Islamic Republic of Pakistan. *Pakistan Social Sciences Review*, 4(2), 736-750.
- Nason, R. (2005). *Guru Nanak and Sikhism*. East Sussex: White-Thomson Publishing Ltd. (2017, 16th November). *Pakistan Patent No. Writ Petition No. 623 of 2016*. Retrieved 1st May, 2021, from <https://courtingthelaw.com/2017/11/16/laws-judgments-2/judgment-analysis/judgment-analysis-ameen-masih-v-federation-of-pakistan-others/>
- Pakistan, N. A. (2017). *Patent No. AACT No. VII of 2017*. Retrieved 1st May, 2021, from [http://www.na.gov.pk/uploads/documents/1489555920\\_681.pdf](http://www.na.gov.pk/uploads/documents/1489555920_681.pdf)
- Patras, A. I. (2019, 4th September). Christian Marriage and Divorce Act 2019 — a long awaited legislation. *Daily Times*. Retrieved 1st May, 2021, from <https://dailytimes.com.pk/459454/christian-marriage-and-divorce-act-2019-a-long-awaited-legislation/>



PIPS, P. I. (2017). *Selected Speeches of Members of the Constituent/ National Assembly* (Vols. 1 (1947-1958). Islamabad, Pakistan: Pakistan Institute For Parliamentary Services (PIPS) and Konard-Adenauer-Stiftung (KAS).

Punjab, P. A. (1961, 2nd March). *Punjab laws*. Retrieved 30th April, 2021, from <http://punjablaws.gov.pk: http://punjablaws.gov.pk/laws/777a.html>

Punjab, P. A. (2018, 20th March). *Punjab Laws*. Retrieved 19th April, 2021, from [punjablaws.gov.pk: http://punjablaws.gov.pk/laws/2698.html](http://punjablaws.gov.pk: http://punjablaws.gov.pk/laws/2698.html)

Shah, M. ), Parveen, T., Syed, T., & Kanwal, A. (2017). Religious Minorities Rights: Myth and Realities. *Acadmic Journal of Social Sciences*, 1(3), 220-234.

Sindh, P. A. (2017, 16th April). *Pakistan Patent No. SINDH ACT No. IX OF 2016*. Retrieved 1st May, 2021, from <http://www.pas.gov.pk/uploads/acts/Sindh%20Act%20No.IX%20of%202016.pdf>

Solangi, M. (2017, 16th November). *Courting the Law*. Retrieved 1st May, 2021, from <https://courtingthelaw.com: https://courtingthelaw.com/2017/11/16/laws-judgments-2/judgment-analysis/judgment-analysis-ameen-masih-v-federation-of-pakistan-others/>

Toppa, S. (2017, 8th November). *Aljazeera*. Retrieved 1st May, 2021, from <https://www.aljazeera.com: https://www.aljazeera.com/features/2017/11/8/sikh-pilgrimage-transcends-pakistan-india-tensions>