

**RESEARCH PAPER****From Exclusion to Inclusion: A Comparative Analysis of Pakistani Inheritance Laws and International Best Practices for Women's Empowerment****¹Muhammad Babar Shaheen*, ²Hafiza Madiha Shehzadi and ³Muhammad Hassan Sajjad**

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ABSTRACT

Women are considered to be the most vulnerable organ of society and hence face many difficulties in their social, economic, and domestic lives. This article examines how women might gain empowerment through their inheritance rights. It also examines Pakistan's international commitments, best practices regarding women's empowerment, and various national and international statutes in detail. This article concludes that various national and international legal frameworks, including Islamic laws, are available to protect women's inheritance rights in Pakistan. However, it is observed that the majority of Pakistani society does not adhere to these legal and Islamic regulations. Most of the women in our society financially depend on males and they feel fear of social breakup, pressure, and fighting with family due to lack of knowledge of their legal and Islamic right of inheritance. Deprivation of women from their inherited shares through freaky devices such as wills, gifts, or under the garb of custom, family honor, or regional culture as well as under coercion is rampant which is a clog in women's empowerment. This research highlights the gaps in Pakistani inheritance laws compared to international best practices for women's empowerment, aiming to highlight pathways toward more equitable systems.

Keywords: National and International Laws, Women's Empowerment, Women's Inheritance Rights**Introduction**

In patriarchal societies, property inheritance often favors men over women. Women's inheritance rights can be a significant step towards their socio-economic empowerment, as ownership of property can provide financial security, elevate social status, and enhance the ability to participate in decision-making within and outside the family. This research article aims to explore how inheritance rights in Pakistan's legal framework and international best practices contribute or fail to contribute to the empowerment of women. No doubt women play a vital role in the betterment of the whole society but when they demand their inheritance rights face many hurdles. Women's disposal right is a huge problem throughout the world but the current situation in Pakistan regarding this matter is so horrible and irreparable according to the statistical data. So, there is a need to revise the women's inheritance protection laws and structure so that women's right to inheritance may be protected at every cost according to the injunctions of Islam and the teaching of the Holy Quran and Sauna as well as provided in the national and international laws and commitment.

Globally, inheritance laws significantly impact women's empowerment and gender equality. Islamic law, which grants women certain rights but is frequently subverted by cultural customs and patriarchal norms, has a major influence on Pakistan's legal system of inheritance. Islamic law grants women certain legal rights, but cultural constraints and

ignorance often hinder them from receiving their rightful inheritance portions. Legal ambiguity, economic dependency, and restricted access to legal assistance exacerbate this problem.

The differences in inheritance rules between Pakistan and other developed nations highlight important deficiencies that impede women's empowerment. Equitable inheritance policies in many countries actively advance women's economic independence & social status in addition to guaranteeing equal rights for men and women.

Although they are legally entitled to inherit a family's fortune in Pakistan, women hardly ever take advantage of this privilege. The Family Laws of Pakistan grant women the right to inherit both moveable and immovable property as well as CEDAW provides equal rights to women at the international level but in reality, women are typically not given their fair share of inheritance, especially if the property is land, in such cases an entire claim is frequently rejected.

The inheritance rights of women in South Asia vary from state to state due to religious and cultural factors. India and Pakistan remain colonies of British rulers after the occupation of the East India Company. This occupation also affects the legal framework in the subcontinent.

Literature Review

Pakistan's Inheritance Law Nature

Islamic law, which purports to grant women certain rights, essentially governs Pakistani inheritance rules. However, these legal protections are frequently undermined by cultural norms. Islamic law holds that women are entitled to inherit a fixed portion of the estates of their deceased relatives, usually half of what men inherit. Even though this clause is a step in the direction of recognizing women's rights, social conventions usually prevent it from being used. Families frequently dissuade women from taking up their fair share, which lowers their social standing and makes them economically dependent. (Khalid, 2019)

In addition, the problem is made worse by unclear laws and a general lack of knowledge regarding women's rights. Many women still do not know about their rights; and even those who do encounter significant obstacles when trying to exercise them. Because of society's patriarchal system, women are frequently dissuaded from seeking legal action, which leaves them defenseless and without rights. (Khan, 2022)

Numerous modifications were made to the subcontinent's imperial and political ties following the 1857 War of Independence. Numerous reformers, both Hindu and Muslim, emerged in the subcontinent to improve the situation that was in place at the time. The education of women was one of the topics covered. For women to acknowledge their rights and responsibilities as stipulated by Islam, many Muslims decided to educate them one of them was Sir Syed Ahmad Khan. The poor status of women on the Indian subcontinent led to harsh criticism of the British authority. Practically speaking, though, the British government did little to improve the status of women. (Khan, 2022).

The British were largely responsible for the changes in Indian women's lives. Among those who showed a particular interest in women's education were Sir Donald McLeod (Governor of the Punjab, 1865–70), Sir William Muir (1864–84), Colonel Holroyd, and Mathew Kempson (Governor of the U.P.). Sir William Muir began giving out annual prizes for reforming movements in 1868.

Muslim women were denied the right to inherit agricultural land by the Punjab Act of 1872. *Asmat Journal* published numerous pieces written by Allama Rashid-ul-Khairi. Such

actions, according to North Western Punjab MLA Fazal-ul-Haq Paracha, will provoke a feminist uprising. It was thought to be a fortunate omen when Islamic rules protecting women's rights were implemented. Non-Muslims also supported the freedom of Muslim women. GV Deshmukh, M.D.

At the start of the 18th century, religious experts' unrelenting campaign resulted in the imposition of Muslim family regulations. The initial move was made by the Frontier Province Branch of Jameat-ul-Ulmae-Hind. To give Muslim women access to their inheritance, dower, and divorce rights under Islamic personal rules, the 1937 Shariat Act was created. Clarifying issues with succession, special property of females, betrothal, adoption, marriage, divorce, maintenance, dower, guardianship, minority, bastardy, family relation legacies, gift partition, etc. was the stated goal of the Shariat Act. The bill seeks to ensure that Muslims in British India are subject to the same laws in all aspects of their social and interpersonal interactions (Iqbal, 2019).

During its 1938 Patna conference, the Muslim League approved a resolution proposed by Quaid-e-Azam Muhammad Ali Jinnah to establish a League Sub-Committee specifically for women. Muslim women started to contribute to politics in a logical, well-organized, and useful way for the first time. The ladies of the Muslim League persisted in their efforts even after Pakistan was established.

Empowering women is the first step toward eradicating toxic value systems and repressive ideas from society. It provides an environment in which there is no gender discrimination and eliminating harmful value systems and oppressive ideologies from society is accomplished by sexes utilizing their skills to create a welcoming society (Azhar vs Khursheed, 1992).

The meaning of inheritance stated in the Qur'an in Surah al-Nisā' verse 7, "There is a share for men and a share for women from is left by parents and those nearest related, whether the property is small or large, an obligatory share (AL QURAN,4;7)

Material and Methods

This research employs a mixed-methods approach to analyze Pakistani inheritance laws in comparison with international best practices for women's empowerment. The research methodology is designed to provide a comprehensive understanding of the legal, social, and economic factors influencing women's inheritance rights in Pakistan. We use doctrinal legal research methods to analyze the primary legal sources including;

- Constitution of the Islamic Republic of Pakistan 1973
- Islamic inheritance laws (as applied in Pakistan)
- Relevant statutory laws and amendments
- Case law and judicial interpretations
- And also examine international legal frameworks, like
- UN conventions (e.g., CEDAW, UDHR)
- To get more effective outcomes a comparative legal analysis is used to;
- Develop a framework for comparing Pakistani inheritance laws with international standards
- Identify gaps between Pakistani laws and global best practices
- Analyze the potential applicability of successful international practices to the Pakistani context

This methodology aims to provide a robust foundation for analyzing Pakistani inheritance laws and their impact on women's empowerment, while also facilitating a meaningful comparison with international best practices.

Analysis of Pakistani Inheritance Laws and Their Impact on Women's Empowerment

Opening of Inheritance

In our legal system, inheritance rights vest in the legal heir upon the death of the property owner. This means ownership of the property, to the extent of their designated share, transfers automatically to the heir at that moment.

Intaaql-e-Warasit (Mutation)

Under section 42 of The Punjab Land Revenue Act, 1967, after opening the inheritance, the first step is Intaaql-e-Warasit / Mutation, and the following documents are required for Intaaql e Wasasit.

- Death certificate of Mors-e-Alla which is issued by the Union Council
- Family registration certificate (FRC) which is issued by NADRA
- Computerized National Identity Cards of all sharers
- Succession certificate (in case of moveable property) from Civil Court
- All relevant documents of the property
- Any other relevant documents which are required for any particular property

Procedure of Inheritance Mutation

A written application shall be submitted before "Halqa Patwari" by any co-sharer and after receiving the application based on documents the 'Halqa Patwari" shall prepare "**Shajar-e-Nasb**" (**genealogy tree**). Then the Patwari shall certify from the "*Lamberdar*/ village headman" concerned or from at least two "**Patti daar**" regarding the co-sharers.

After that, he shall advertise in a newspaper regarding the upcoming Mutation and the expenses of newspaper advertisement will be borne by the applicant. After completion of all the procedures as mentioned earlier, the Patwari shall produce the parties before the "Halqa Tehsildar", who after conducting a formal inquiry shall pass the inheritance Mutation,

The Customary Practices

In Pakistan, it is a customary practice that after the death of "Mors-e-alla" brothers do not show their sisters' names in FRCs & succession certificates by making false statements and documents by which they deprive their sisters of their respective inheritance rights; to halt this wrong practice the civil as well criminal remedies are available in the legal system of Pakistan.

Remedies In Case of Infringement of Inheritance Rights

Criminal Remedies

The Pakistan Penal Code (PPC) protects women's inheritance rights through Section 498-A of Chapter XX-A and this provision was added to the Pakistan Penal Code in 2011. This section criminalizes depriving a woman of her rightful inheritance through deceitful or illegal means. The punishment for such an offense can be imprisonment for up to ten years, a fine of one million rupees, or both (Zafar,2019).

However, it's important to note that according to Schedule II of the Code of Criminal Procedure (CrPC), Section 498-A is classified as a non-cognizable offense. This means a First Information Report (FIR) cannot be filed directly with the police.

If a woman believes that she has been denied her inheritance, she can still seek justice. The CrPC provides a path forward through Section 200 of Chapter XVI. This section allows her to file a complaint with a Magistrate. The Magistrate will then examine the woman under oath and record the details of the complaint. (Basit, 2023).

Other criminal remedy includes registration of F.I.R. under sections 420/468/471 of PPC. A woman can submit an application to the concerned S.H.O. for the registration of FIR against co-sharers for preparing false and fabricated documents to deprive her of the inheritance right, on receiving an application the S.H.O. concerned is bound to register the criminal case under section 154 of CrPC (Mehdi, 2021).

So, it is clear that when a male co-sharer deprives a woman of her legal inheritance right, she may file a complaint under section 498-A of the PPC by adopting the above-mentioned procedure or register a criminal case against him under section 420/468/471 of PPC for getting her share to empower herself through inheritance (Zafar,2019).

Civil Remedies

If a woman suspects a fraudulent inheritance mutation, she has legal remedies in civil law also. The Specific Relief Act offers a path through Section 39. This section allows her to file a suit for cancellation of the mutation. A mutation refers to the official record reflecting the inheritance transfer.

However, simply filing a suit might not be enough. To prevent further complications, she can also apply for a temporary injunction under Order XXXIX of the Code of Civil Procedure. This order allows the court to grant a temporary injunction. An injunction can restrain the other party from selling or otherwise disposing of the inherited property until the court reaches a final decision in the main lawsuit. (Abid,1908).

She can also file an appeal under section 161 of the Land Revenue Act 1967 before the collector for the cancelation of illegal mutation and revision of inheritance as per actual legal heirs of the deceased person in the light of FRC and other documentary evidence (Khan, 2009). It is pertinent to mention here that the deprived woman can initiate criminal and civil proceedings simultaneously and there is no legal bar in this regard.

Partition of Urban Land after Inheritance Mutations

In the case of inheritance mutation, a woman gets her right by the procedure provided hereinafter when the property is transferred in the name of the woman but it is still undivided property.

She can file a suit under section 4 for the partition of urban property and claim "Mesne Profits" under section 7 for the period that is used by other co-sharers. The Punjab Partition of Immovable Property Act, 2012 deals with types of suits. The Code of Civil Procedure will apply to proceedings under this act. Furthermore, at any stage of the proceeding, the parties can settle their dispute by mutual understanding and the court recognizes it as a "private settlement".

This Act also provides the mechanism for the partition of property through a third person known as a "referee". If all co-owners agree the court appoints a "referee" who provides a plan for the division of the property keeping in view the fair and equitable rights of all the co-owners. If the property is such that is partition is not possible court can announce its auction. The auction will take place in two steps, in the first step the court allows the co-owners to bid for the property and the highest bidder will pay the amount to the rest of the co-owners within a time frame set by the court. If no co-owner is willing to purchase the property through auction. The court announces the open auction to the public

at large. Even a co-owner can participate in the open auction but the highest bidder will win the auction.

Partition of Agricultural Land after Inherited Mutation

In Punjab, Pakistan the land is divided into urban land and agricultural land with different statutes. The rates for the transfer of property are different for each class. Property tax will apply on urban land where the land revenue will be collected on agricultural land. For the partition of agricultural property, the parties have to apply for partition before Tehsildar. Who will get a report from the Halqa-Patwari and order for the partition of land keeping in view the principles of fairness. To facilitate the owners of land, an amendment to the Punjab Land Revenue Act in 2012 aims to simplify inheritance and partition processes, particularly for women. Upon approval of inheritance mutation, the Revenue Officer issues a notice to all joint landowners in this property or the landowners can submit a mutually agreed-upon partition plan within 30 days.

If no agreement is reached within 30 days before the Revenue Officer, he initiates partition proceedings. He must decide on the partition cases within 180 days of the inheritance mutation approval or the partition application date. If unavoidable delays occur, the officer can request a one-time 60-day extension from the District Collector with justification, and in case of failure to decide within the timeframe or violating extension conditions can lead to disciplinary action against the Revenue Officer.

Application of Qanun e Shahadat Order, 1984

In Pakistan, the Qanun-e-Shahadat Order provides the rules of evidence in all criminal and civil proceedings, including inheritance matters. It has no direct application in inheritance matters but provides the mechanism for proving or disproving any fact or fact-in-issue. Here's an overview of the QSO's application in inheritance cases:

- If a person is missing for 7 years, they are presumed dead for inheritance purposes.
- Documents, witnesses, and other evidence can be used to establish relationships between parties.
- Marriage certificates, Nikah Namas, or other documents can be used to establish a marriage.
- Birth certificates, DNA tests, or other evidence can establish parentage.
- Documents duly executed and registered are presumed valid.
- Experts can provide opinions on matters such as forgery, handwriting, or document authenticity.
- A will must be proved through evidence in case of a dispute between parties.

When a woman is deprived of her inheritance rights, she has to prove her case while producing two competent witnesses and relevant documents. If there is a dispute regarding the parentage of a legal heir, the Court may seek expert opinion by way of a DNA report.

Whenever a woman is deprived of her inheritance rights, the burden of proof lies on her shoulders. She has to prove that; she has been deprived of her legal and religious right. (Pakistan Law Division, 1984).

The Constitution of Pakistan

The Constitution of Pakistan protects inherited property, including that of mothers and children. It also prioritizes social justice, eradication of social evils, women's empowerment, and their protection. Denying women's inheritance undermines these principles. It traps them in poverty, hinders their economic independence, and concentrates

wealth unfairly. This economic hardship also restricts their participation in society. In short, depriving women of inheritance goes against the very goals Pakistan's constitution strives to achieve. (Zafar,2017)

Property Transfer and Inheritance Laws

Transfer of Property Act, 1882

This law outlines the procedures for transferring property. It focuses on establishing a legal framework for ownership rights and how to transfer them, but it does not specify how inheritance should be divided based on gender.

Registration Act, 1908

This law ensures certain property documents, including inheritance deeds, wills, and gifts are officially registered. This creates a legal record of the transfer and offers several benefits:

These laws work together to facilitate the legal and documented transfer of inherited property but don't dictate how much each person inherits.

Global Human Rights Frameworks

One essential component of gender equality is the right of women to inherit. To safeguard and advance these rights, several international frameworks and treaties have been formed.

The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) provides equality to women with men in all civil rights including inheritance. Unfortunately, the Western states recognized this lawful right of women in the eighteenth century or after it. For many centuries the rule of primogeniture prevailed in these states which is an unfair one. Similarly, UDHR and other Regional Conventions also recognize this sort of right for the empowerment of women but the main issue is the enforcement of this right. The international conventions did not have any sort of mechanism to enforce the rights directly but had only a few sanctions to bind the states to do so. Ultimately, the available remedy for affected women is their domestic law. Achieving gender equality and empowering all women is the aim of Sustainable Development Goal (SDG) 5. Part of this objective is to guarantee equal access to inheritance rights; since this is crucial for the economic advancement of women. Here are a few additional relevant Treaties and Declarations

- Declaration on the Elimination of Violence against Women
- Convention on the Rights of the Child
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social, and Cultural Rights

Pakistan's Global Commitment and Treaties

Pakistan committed to gender equality by ratifying the Convention on Ending Discrimination Against Women (CEDAW) in 1996, though with a reservation. This treaty, along with others like the Universal Declaration of Human Rights, emphasizes everyone's right to property, including land ownership, which can help reduce poverty. Interestingly, the US hasn't ratified CEDAW, unlike most countries. While CEDAW doesn't directly address

women's inheritance, it promotes equal property rights for spouses and legal capacity for women. International recommendations highlight unequal treatment of women in legal systems, suggesting accountability for ensuring equal rights. This creates some tension with Pakistan's current inheritance laws.

International Statistical Data on Gender Equality/Women Empowerment

Leadership: While women make up nearly 40% of the workforce, only 28% hold management positions globally. Progress is slow, and at this pace, gender parity would take over 140 years. Sub-Saharan Africa leads with 38% female managers, while Northern Africa and Western Asia lag at 15%.

Reproductive Rights: Only 56% of women in unions (aged 15-49) can make decisions about their sexual and reproductive health. Disparities exist, with sub-Saharan Africa at 37% and some European and Latin American countries exceeding 80%. While contraception access is high (89%), a quarter of women lack control over healthcare decisions.

Violence: Rates of physical and sexual violence against women by partners have decreased slightly, with 31% experiencing it in their lifetime (down from 35% in 2000). However, dedicated efforts are needed to reach the 2030 target of eliminating such violence.

Legal Rights: Many countries lack laws protecting women's rights. A staggering 55% don't have laws against gender discrimination, and closing this gap could take decades.

Land Rights: Women often lack ownership or secure rights to land used for agriculture. Legal frameworks are weak in many areas, although some positive examples exist. (Sustainable Development Report,2023)

Difficulties and Obstacles

Despite domestic and international rules, women nevertheless often face significant challenges in their attempts to exercise and achieve their inheritance rights. These challenges include;

- **Religious and cultural traditions:** prejudicial practices and ceremonies that limit women's right to inherit.
- **Lack of knowledge:** Women might not be aware of their rights or how to make them known.
- **Legal barriers:** Women may encounter difficulties navigating the intricate legal systems and protocols.
- **Lack of knowledge:** Many women are unaware of their rights or how to assert them.
Legal barriers: Women may find it challenging to manage the complicated legal systems and procedures.
- **Economic disparities:** It may be challenging for women to assert their inheritance claims due to their economic disadvantage.

Conclusion

When Pakistani inheritance laws are analyzed from the perspective of women's empowerment, it becomes clear that social norms and legal rights interact intricately. The ground realities show a considerable divergence even if the legal framework which includes

national legislation, international treaties, and constitutional provisions ostensibly protects women's inheritance rights. Legal rights are frequently superseded by the prevailing patriarchal society, resulting in a widespread disregard for both Islamic & domestic inheritance laws.

In Pakistan, women encounter many obstacles while attempting to use their inheritance rights, such as social shame, lack of knowledge, and familial pressures. Due to these difficulties, an ample portion of women continue to rely financially on male family members, which exacerbates their marginalization and prevents them from achieving socioeconomic empowerment. Particularly discriminatory acts, including purposefully excluding women from inheritance records and changing norms, draw attention to structural obstacles that support inequality.

Raising awareness and educating women & their families about women's rights is essential to closing the gap between legislative provisions and real practices. Increasing women's legal literacy can empower them to assert their rights more confidently while also challenging social conventions that support discriminatory practices. In addition, bolstering accountability protocols in the legal system in conjunction with the provision of legal aid can markedly improve women's capacity to negotiate the complexities of inheritance disputes.

Ultimately, to advance women's inheritance rights in Pakistan, a diverse strategy is required. Collaboration between government institutions, civil society organizations, and international organizations is necessary to ensure that legislative frameworks are not only in place but actively upheld. It is possible to achieve greater economic autonomy as well as empowerment by changing cultural perceptions of women's inheritance, which will support the idea that women's rights are human rights. Then and only then will Pakistan be able to shift from marginalization to inclusion and create a culture that supports women's equality in society. Being an Islamic society, the role of Ulama and religious scholars is also important in achieving the milestone.

Recommendations

Enforcement Mechanisms: There should be a strong legal enforcement mechanism to protect women's inheritance rights from cultural and familial pressures, coercion, intimidation, undue influence, and misrepresentation.

Education and Awareness: Public awareness campaigns should be engaged to educate communities about women's inheritance rights. The role of religious scholars and national and international NGOs in this regard is very important.

Legal Literacy Programs: Legal literacy programs should be launched to awareness of inheritance law to empower women and to tell them how to knock on the door of the legal system if their rights are challenged.

Financial Literacy Training: Financial literacy skills should be given to women to manage their inherited assets effectively.

Supportive Systems: Legal aid programs should be established to provide women with affordable legal counsel to fight for their inheritance rights.

Cultural Issues: Discriminatory practices, cultural norms, and traditions that favor sons over daughters in inheritance matters should be curbed with iron hands.

Duty of Courts: It is the prime duty of the Courts to show extraordinary circumspection, care, and caution while dealing with and deciding the matter of alienation

of share or rights of the women. The court proceeding should be concluded well in time; because delay in the proceeding is fatal for women's right of inheritance.

Discouragement of Relinquishment Deed: Relinquishment from the right of inheritance through a woman should be discouraged by the Courts. Normally such deeds are signed by a woman without her free consent.

Duties of Land Transferring Department and Officers: At the time of an inheritance mutation an original FRC or succession certificate, as the case may be, should be inspected by the officer concerned and an inquiry should be held by him regarding women co-owners. To halt this rampant customary practice, applications regarding inheritance mutation shall be entertained after due process of the law and link the NADRA record with the Board of Revenue record.

Collaboration with International Organizations: Promote cooperation with international organizations to exchange resources and best practices for enhancing women's inheritance rights. To gain knowledge from nations that have successfully changed their inheritance laws, look into partnering with them.

Social media: Awareness should be extended via social media, programs on television, ads related thereto, and short films.

Women's Organizations: Strengthen women's organizations that advocate for inheritance rights and provide support to women in inheritance disputes.

Monitoring and Evaluation: Government should establish mechanisms to monitor the implementation of inheritance laws and policies, and evaluate their impact on women's empowerment.

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