

Situation Analysis

Punjab Domestic Workers Act, 2019

February, 2023



Executive Summary

The domestic workforce is one of the most vulnerable and exposed groups of workers not only in Pakistan but in the region. The main issues faced by domestic workers are gender inequality, lack of legal protections, restriction on their ability to receive social security benefits, un favorable working conditions, lack of job security, bad treatment, and different forms of harassment at work place.

Many people including young girls, women and men who migrate from rural areas to urban areas in quest of work end up turning to domestic worker because they have lack the knowledge and skills necessary to obtain better-paying, less exploitative occupations. These issues are made significantly worse by the predominance of unofficial employment and the lack of a traditional employment contract, there is still a widespread belief that domestic workers employed by houses are often taken care of and do not always work in exploitative circumstances but it is far from reality, even after the Punjab Domestic Workers Act.2019 was introduced in Punjab, the domestic workers do not have regular hours or tasks., they do work without any recourse or formal complaint processes, they abide by all demands from their employers arbitrarily. They experience sexual and physical assault while working in hazardous situations.

Now, it's important to acknowledge and accept domestic worker are also human and it's time to uphold their human as well labour rights through practical measures, such as regulating working conditions and providing skill-development trainings, literacy programs, and minimum wages that are indexed to high inflation and living expenses, occupational health and safety standards; minimum protection in relation to employer, equal treatment as workers as wage earners are availing in other organized sectors, Employers held accountable under the law for ensuring unionization, health and maternity benefits, retirement benefits, registration, and safety.

As a responsible state, Pakistan has also the commitment to bring the laws and regulations in Pakistan into conformity with the standards and principles developed by international human rights treaties and ILO Conventions; Pakistan has yet to sign the ILO Convention C189 - Domestic Workers Convention, 2011 which obligates each member to take measures to ensure that domestic workers, like workers generally, enjoy fair terms of employment as well as decent working conditions. ILO Convention C189 - Domestic Workers Convention, 2011, along with the of ILO R-198 has set of recommendations on the Employment Relationship (2006), calls for equal treatment with domestic workers.

Since its establishment in June 2011, WISE (Women in Struggle for Empowerment) is dedicated to protect and promote social, political, economic rights for women with focus on Gender, Labor, Governance, and Human Rights in Pakistan. Through this report WISE has come up with a set of recommendations aimed primarily at government authorities, legislators, and policy makers to take action to regularize domestic workers in accordance with existing law and international labour standards and to protect them from exploitative situations. It also includes recommendations on how to respond to domestic workers' concerns and provide mechanisms to protect their rights.

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Introduction

The Punjab Domestic Workers Act of 2019 was Pakistan's first comprehensive piece of legislation which came into existence after a long advocacy battle with the goal of improving the working conditions of domestic workers, including their registration. The preamble of this law clearly states the purpose, which is “to protect the rights of the domestic workers, to regulate their terms of employment and working conditions of service, to provide them social protection and ensure their welfare and to provide for the matters ancillary”

These domestic workers make up a significant portion of Pakistan's informal service sector and have a multiplier effect on the economy by allowing women to work, as women make up a sizable portion of the workforce in Pakistan.

In this desk review, the legislation in Punjab related to domestic labor as well as the reasons for and effects of not implementing it, are briefly discussed. Additionally, it highlights some of the policy initiatives and plans put forth by the Act to lessen vulnerabilities and deliver on the promises made to provide good employment opportunities, social security, safety, and welfare.

Punjab Domestic Workers Act, 2019

As an Act II of 2019, The Punjab Domestic Workers Act, 2019 was enacted on 25th January 2019. Here, we examine it section by section and identify the key elements that might be strengthened to better protect domestic workers' legal rights as given by this legislation.

Application of the Law

Section 1 details the beginning and boundaries of this law, defining it as a provincial statute that is applicable to the entire province of Punjab-

Different Definitions

Section 2 of this act, comprises of definitions. It was the first law that defines “domestic worker” as a person who provides services of a domestic nature in a household. It defines the “employer” as a person, a group of persons or an owner of an establishment that recruits domestic workers for household chores. Although the law mentions the bar on children to work but has not included the definition of child for the purpose of this law. The law provides the definition of "Domestic Work" but in the very next section while defining "Domestic Worker", the law does not use the term Domestic Work instead uses Domestic Nature. This creates useless confusion and gives the perception that Domestic Work and Domestic Nature services are two separate things.

Prohibition of Employment of a Child

Section 3 of this law prohibits child domestic labour up to the age of 15 years. A child above the age of 15 but under 18 years may be employed only for light work. All such activities that have no detrimental effects on a child's health, safety, or education are referred to as light work. This also implies that minors older than 15 may be hired for temporary employment while they finish their required schooling. It is also presumed in section 32 that a child present in a household along with one or both of his parents who

are employed therein shall not be presumed to be in employment within the meaning of the Act unless proved. Even though the primary purpose of this law is to regulate the domestic labour market. In contrast, under the Punjab Prohibition Of Child Labour At Brick Kilns Act 2016, a child found at Brick Kilns during school time is presumed by the law to be working at the Brick Kiln and the burden lies jointly on the occupier and parent or guardian to prove it otherwise.

But civil society has expressed grave concerns about this age restriction and has called for a ban on child domestic labour up to the age of 18 years as the characteristics of child domestic labor are not in accordance with international labor rules, standards or any principles of child protection. The track record of the CDL cases has shown that the overall situation is alarming where general acceptance of exploitation, internal trafficking, severe torture, abuse, forced labor, slavery and murders of helpless and innocent Child Domestic Laborers persist in society. It is also necessary to advocate for the implementation of this law by creating better regulations for it as well as coherence with the existing child protection systems.

Concluding Observations of UN Committee on the Rights of Children:

UN Committee on the rights of children in its concluding observations on its 5th periodic report in 2016 showed very strong concerns regarding the abuse and torture of working children, including child workers, It stated;

Committee Urges the state party to develop programmes and mechanisms to identify and protect child victims of forced labour, particularly bonded labour as well as child labour in informal sectors, including domestic work.

Domestic workers' rights and benefits

Section 4 to section 10 provides rights and entitlements to domestic workers like a letter of employment, wages, leave/maternity leaves, the entitlement to holidays and accommodation facilities. The legislation also states that no domestic worker shall be subjected to discrimination in hiring, maintaining employment, determining salaries, benefits, and other rights on the basis of religion, race, caste, creed, sex, ethnic background, place of birth/residence, domicile, migration, or any other factor. The term "domestic worker," not "servant," shall be used to refer to the employee, but any practical step to change the social behavior is not suggested in the law.

Domestic Workers Convention, 2011 (No.189) Article 7 and 8 requires that measures be taken to ensure that domestic workers are informed of their terms and conditions of employment in an appropriate verifiable and easily understandable manner and preferable, where possible through written contracts (enforceable in the country where work is to be done)

No additional tasks may be given to the domestic worker without their consent and without additional compensation as well as the employer is required to provide the domestic worker with respectable working conditions and occupational safety and health precautions. According to the Punjab Employees Social Security Ordinance, 1965 (X of 1965) and the rules made thereunder, benefits for a domestic worker shall include sickness benefits, medical care during sickness, and medical care for dependents, injury benefits, disablement pension, and survivor's pension.

The Workers with Family Responsibilities Convention, 1981 (No.156) Article 1 refers to workers with family responsibilities and applies to men and women workers with responsibilities in relation to their dependent children, and to other members of their immediate family who clearly need their care or support.

A letter of employment in the required form detailing the terms and conditions, the type of work to be performed and the wage rate, the employer may preserve a copy of their identification documents and must provide a copy of the letter of employment issued under subsection to the concerned labor Inspector.

Domestic workers are entitled to a weekly rest day. The other leaves/holidays are as follows:

- Sick leave: 8 days
- Maternity leave: 6 weeks
- Festival/public holidays: 10 days

The law specifies clear instructions regarding the leaves, its encashment, every domestic worker is entitled to at least one full day of vacation each week and eight days of paid sick leaves per year, total, with no deductions from pay.

Every domestic worker employed to perform domestic work is entitled to ten full-pay holidays each year. The employer and the domestic worker must agree on the days and dates of these vacations before the start of the calendar year. A woman who works as a domestic helper is entitled to six weeks of maternity leave accordingly. A female domestic worker shall also be entitled to maternity benefits with a minimum amount equivalent to six weeks' wages in the prescribed manner but not less than the minimum wages notified by the Government. Section 10 highlights that all employers are expected to give live-in domestic workers adequate living space.

The Maternity Protection Convention, 2000 (No.183) Article 3 requires appropriate measures for the pregnant and breastfeeding women are not obliged to perform work that has been determined by the authority to be prejudicial to the health of the mothers or the child and Article 4 states that maternity leave of 14 weeks should be provided. Article 10. requires that a woman worker must be provided with the right to one or more daily breaks or a daily reduction of hours of work to breastfeed her child. The period during which nursing breaks or the deduction of daily hours of work are allowed, their number, the duration of nursing breaks and the procedures for the reduction of daily hours of work shall be determined by national law and practice.

Under section 4 Domestic worker gets the benefits provided under Punjab Employees Social Security Ordinance, 1965 but 12 weeks of maternity leaves provided under Punjab Employees Social Security Ordinance, 1965 are not extended to female Domestic worker. The Law does not provide any monitoring mechanism to ensure that every domestic worker gets the employment letter and terms of employment are actually being fulfilled and the domestic worker is not being exploited through extra work without overtime. Similarly, no mechanism is available to ensure that domestic workers get the leaves and holidays as promised under the Act. Under the leave section, female domestic workers are exploited under the law and they are given only six weeks of maternity leave instead of the twelve-week maternity leave given to workers under the Punjab Employees Social Security Ordinance, 1965 while the ILO

standard is of fourteen weeks of maternity leave. Section 9 of the Punjab Domestic workers Act 2019 violates Article 25 of Constitution of Pakistan states that there would be not discrimination against any person and the provision of different maternity benefits are an infringement of the fundamental right of the female domestic worker.

Government of the Punjab Labour & HR Department Notification No. SO(D-II)MW/2011(Vol-VI) dated 22 June, 2022 by Minimum Wages Board only provides minimum wages for employees of industries & establishments in Punjab Province and fails to provide minimum wages for domestic workers under Punjab Domestic workers Act 2019. A domestic worker will not be able to file any claim against the employer as the government has failed to notify minimum wage as per the requirement of the Act. The Act provides the possibility of a live-in domestic worker but remains silent on the wages which the live-in will be paid as a live-in domestic worker will end up doing more than 8 hours of work per day. But unfortunately, still there are no rules, standard operating procedures or policies available. The government should devise these to ensure rights related to job agreements, wage and leave entitlements are provided to domestic workers.

Examination by a physician, vaccinations, and immunizations reporting of a specific accident.

In sections 11 and 12 the law suggests the annual medical examination and any needed vaccination at the expense of the employer, the law also requires compulsory reporting of any workplace accident in the manner shall be specified in the rules, practically there is no change or introduction of any specific program introduced yet at any level for the domestic workers and secondly no penalty is provided in case the employer fails to report the workplace accident, without any action against the employer, this protection will never be provided to the domestic worker.

The word yearly is a very broad term, realistically the first medical examination, vaccination and inoculation should be carried out when the domestic worker joins the job and afterward it can be carried out on yearly bases. Most of employers will hesitate to spend on medical examination, vaccination and inoculation and the payment of these procedures should be covered under Domestic Workers Welfare Fund established under this Act.

The Occupational Safety and Health Convention 1981 (No.155) Article 16

Employers must take reasonable steps to ensure that the workplace, machinery, equipment, and processes under their control are safe and pose no health risks, and that chemical, physical, and biological substances and agents pose no health risks and that the necessary precautions are taken, according to the law. Article 19 mentions that there should be arrangements under which workers and their representatives in the undertaking are given appropriate training in occupation safety and health, In Article 21 also underscores that workers are not required to pay for workplace safety and health measures.

Social Security (Minimum Standards) Convention, 1952 (No.102) also prescribes the provision of benefits in cases of employment injury, death and benefits to the widow or family etc.

Employment termination section 13 requires that in case of termination of employment, one month's written notice prior to termination of employment is required, and it may come from the employer or the domestic worker. In lieu of the notice, one month's earnings will be provided based on the average of the previous three months' salaries. In reality, in the informal sector, one-month termination notice is never given to the employee. In order to protect the domestic worker, the law should bind the employer to send a copy of the one-month termination notice to Inspector in the same manner as the employer is bound to send a copy of the employment letter to the Inspector under section 5(2) of this Act.

Sections 14 and 15 are about the belongings and relinquishing of rights, the law mentions that personal items and identification papers belonging to a domestic worker or his family should not be kept after the termination of employment. If any property or belongings of a domestic worker are not returned to him, the aggrieved domestic worker may apply to the Dispute Resolution Committee to get them back, and the Dispute Resolution Committee may, after giving the employer a reasonable opportunity to be heard, order the employer to do so. If a domestic worker waives any rights granted by this Act, whether done so before or after it took effect, the waiver is void to the extent that it seeks to deprive the domestic worker of those rights. Firstly, if the registration process of a domestic worker as required under the Act is complete then there would be no need of holding any identification documents of the domestic worker or their family. Secondly, the law should bound the employer to mention the details of the identification document held by him in the copy of the employment letter to the Inspector under section 5(2) of this Act.

ILO Convention No.158 Article 11 specifies that a worker whose employment is to be terminated shall be entitled to a reasonable period of notice and compensation in lieu thereof,

Wage rates and Payments

Sections 16 to 19 are about the wage rate, payments and conditions. The wages of domestic workers are to be clearly set up through employment contracts, provided that the wage is not less than the minimum wage set by the government in this regard based on the recommendations of the Minimum Wages Board, which was established under section 3 of the Minimum Wages Ordinance, 1961. The law forbids discrimination based on gender in the payment of wages for work of equal value.

One month is the maximum time frame for wage payments. After the salary period has ended, employees must be paid within five days. The length of the wage period may be set on an hourly, daily, or weekly basis, but it may not exceed one month. Wages must be paid in local currency and on working days, not on holidays. If a domestic worker's employment is terminated, the pay earned by him or her must be paid before the end of the second working day following the day of the termination.

Subsection 2 and 3 of section 19 creates confusion as to which procedure should be adopted for the settlement and recovery of wages from the employer. Subsection 2 states that the Court of Magistrate shall direct the employer to pay the actual or the difference between the amount actually paid to the such domestic worker and the amount which would have been paid to him had there been no contravention of the law. But in subsection 3, the Act states that all claims relating to wages are to be settled and recovered in the same manner as is provided in the Minimum Wages Ordinance, 1961. When subsection 2 gives the power to Magistrate Court then directing the domestic worker to follow the procedure laid in Minimum Wages Ordinance, 1961 will only complicate his life. Secondly, the Minimum Wages Ordinance, 1961 does not provide any separate or speedy recovery method.

Subsection 4 uses the word `Authority` but the term has not been defined in any of the sections of the Law. This again creates confusion, is the Court of Magistrate being referred to as Authority or is it some administrative agency under the labor department? Subsection 5 provides that appeal against a direction made under subsection 3 or 4 will be decided by Labour Court constituted under the Punjab Industrial Relations Act, 2010. In every subsection different forum is provided for claiming the right with the complicated procedure that a domestic worker can never adopt due to time and financial constraints.

Registration of domestic workers and Employers

The law requires in section 20 that employees must be registered with the Labor Department in the prescribed way in order to be eligible for benefits under the "Domestic Workers Welfare Fund" established under this law, Additionally, each employee shall receive an identity card and unique security number, both of which are renewable after three years. The labour department has introduced the prescribed form and domestic workers may apply through the form available at the following link.

<http://pessi.gop.pk/Download/Domestic%20worker%20Registration%20a.pdf> (Eng)

<http://pessi.gop.pk/Download/Domestic%20Worker%20Registration%20FORM%20A%20URDU.pdf> (Urdu)

Similarly, In section 21, it is recommended that after submitting an application for registration, employers shall register themselves. The registration numbers shall also be given to employers as well. An employer's registration is renewable after three years. The following link was publicized by the department, employers who employ domestic workers can register themselves:

<http://pessi.gop.pk/Download/Domestic%20Employer%20Registration%20b.pdf> (Eng)

<http://pessi.gop.pk/Download/Domestic%20Worker%20Registration%20FORM%20B%20URDU.pdf> (Urdu)

The domestic workers may get themselves registered as they might get some benefits but as most of the domestic workers are either uneducated females or children, it is highly unlikely that they will be able to register themselves. The employer does not get any benefit from registering himself and there is no punishment provided under the Act if he doesn't register. Under these circumstances, employers will never bother to register themselves. The android application developed for the registration of domestic workers seems to not work, currently, sign-up option is not available and the only option available on the app is to log in for domestic workers who previously registered.

Domestic Workers Welfare Fund

Section 22 of the law talks about the establishment of a fund the Government shall establish a fund to be called the "*Domestic Workers Welfare Fund*" to provide social protection, safety, and welfare measures to domestic workers. This is the most important section in terms of the financial security of domestic workers.

(2) The Fund shall consist of:

- (a) all grants and loans as may be made to the Fund by the Government;
- (b) all sums received by the Fund from other sources as may be decided upon by the Government and all voluntary contributions from the philanthropists;
- (c) income from the investments made and properties and assets acquired from the Fund; and
- (d) proceeds of loans raised by the Governing Body.

(3) The Fund shall be applied to:

- (a) financing of measures including education, training and skill development;

- (b) benefits for domestic workers provided in subsection (6) of section 4 of the Act;
- (c) any money in aid of any scheme for the welfare of the domestic workers; and
- (d) meet the expenditures in respect of the cost of management and administration of the Fund.

The delay in setting up this fund and the non-functioning of this fund is denying the legal rights provided by this law to domestic workers. Despite a large number of domestic workers, mostly women, have applied to enroll in this fund, there has been no serious effort made by the relevant departments in this direction. Section 23 says that The Governing body shall be the same as set up under The Provincial Employees' Social Security Ordinance, 1965 and same rules shall apply to the Governing Body's duties. According to section 24, all claims for benefits under this Act must be submitted within the specified timeframes, in the prescribed format, and with the supporting documentation, information, and evidence of eligibility as specified by the Governing Body and the payments shall be made in the prescribed manner. Unfortunately, the Governing Body has not prescribed any format or timeframes. Similarly, the rules of business of this Act are still not developed which makes it impossible for domestic workers to claim any benefits.

ILO Convention No.189 Article 16 specifies that all domestic workers have effective access to courts, tribunals or other dispute resolution mechanisms.

Resolution of disputes.

Sections 25 to 27 are about the Dispute resolution, for the efficient enforcement of the Act, at the lowest level of local government shall establish a committee known as the Dispute Resolution Committee. The head of the lowest tier of the local government or another person as may be designated by the Government will preside over the Dispute Resolution Committee, which will have the number of members and composition as may be required. Every dispute or complaint that arises from or is related to the execution of the Act must be brought to the Dispute Resolution Committee within 30 days of the date the dispute first surfaced in order for it to be heard and resolved by an award. Within 30 days of the award, any party who feels wronged by the decision may appeal to the Appellate authority. The Government shall appoint an Appellate Authority in each District to hear and decide the appeals preferred against the award of a Dispute Resolution Committee.

The local government system has been dysfunctional most of the time since the passing of this Law and Dispute Resolution Committees have never been notified. Similarly, no procedure has been laid down that the domestic worker would need to follow to file a dispute before the Committee. Subsection 3 of section 25 states that all disputes or complaints shall be decided by Dispute Resolution Committee but as stated above as per section 19, all claims of a domestic worker relating to wages are to be decided in a manner provided under Minimum Wages Ordinance, 1961 and a Magisterial Court or Authority can also decide matter related to wages. The law is not clear as to which procedure is to be followed when by the domestic worker.

According to section 27 Every Dispute Resolution Committee and Appellate Authority shall have the same powers granted to a Civil Court under the Code of Civil Procedure, 1908 (Act V of 1908), with respect to the following matters: (a) compelling the attendance of any person and subjecting him to an oath; (b) compelling the production of documents and tangible objects; and (c) issuing commission (d) such other matters as prescribed. Similarly, in Section 33. It is also mentioned that No prosecution under the Act or any rules made thereunder shall be instituted except by or with the previous sanction of the Dispute Resolution Committee. Appellate Authority has not been notified by the Government so far.

Penalties

Section 31 is suggesting the penalties in the situation of violation of this law. If found guilty, an employer who disobeys or violates any provisions of the Act other than section 3 will be subject to a fine that, for a first offence, may reach 5,000 rupees and, for a second or subsequent offence, may reach 10,000 rupees. Anyone who knowingly violates the terms of Section 3 related to engaging a child domestic laborer is subject to punishment, which may include imprisonment for a term that may not exceed one month if they employ a child under the age of 12 years and, in the case of a child under the age of 15, a fine that may not fall below Rs. 10,000 but may not exceed Rs. 50,000. And any employer or other person who knowingly hinders an inspector from exercising any authority pursuant to section 37 or refuses to disclose any proof, statement, or other document upon demand under said section 37 shall be subject to a fine that may reach Rs. 10,000.

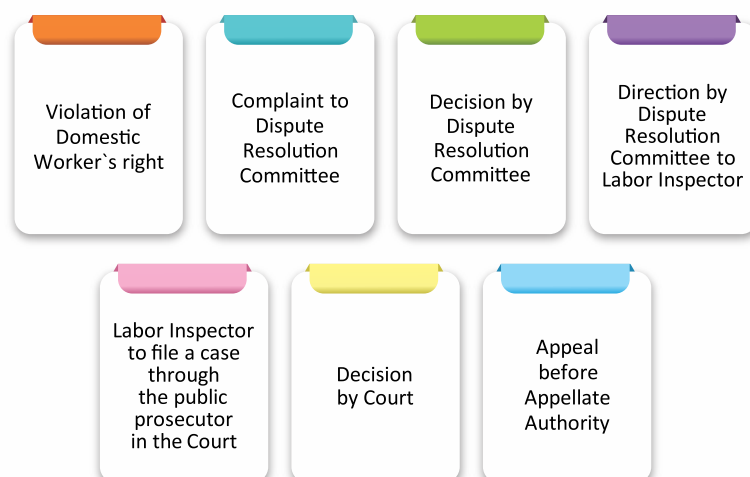
Penalties are very weak especially for employing children. The child protection provisions are missing in the Law which can ensure that children in domestic work can be protected and rehabilitated. As discussed, the redress mechanism is also very complicated which means that no one will be punished under this Act.

Functions and powers of Inspectors

Section 36 law sets the limits of the inspectors and their functioning for the purpose of complaint handling it says that any inspection of a household must be ordered by a Dispute Resolution Committee after receiving a complaint. An Inspector may file a case through the public prosecutor in the court of competent jurisdiction to fulfill any duties under the Act or the rules made thereunder, at the direction of the Dispute Resolution Committee. He may also exercise any other powers granted to him that may be required to fulfill the purposes of the Act.

Inspection by an Inspector can only take place after directions from Dispute Resolution Committee. Even when the Dispute Resolution Committee becomes functional it will be a very lengthy process for a domestic worker to follow for getting any justice.

Redress Mechanism under Punjab Domestic Workers Act 2019



Recommendations

Following is the set of recommendations to improve the existing law and facilitate the lives of domestic workers in Punjab.

Institutional and Policy Recommendations

- Labour & Human Resource Department on its own or in collaboration with Local Government & Community Development department should develop a monitoring mechanism to ensure that children are not employed as a domestic workers.
- Minimum Wages Board should immediately notify the minimum wages for domestic workers working 8 hours of work per day and live-in domestic workers.
- The Government should immediately establish the Domestic Workers Welfare Fund.
- Annual medical examination and vaccination required under the Act and other related benefits should also be paid through under Domestic Workers Welfare Fund established under this Act.
- Labour & Human Resource Department should bound the employer to send a copy of the one-month termination notice to Inspector in the prescribed manner as the employer is bound to send the copy of the employment letter to the Inspector under section 5(2) of this Act.
- Labour & Human Resource Department should ensure the registration of employers and domestic workers for the provision of benefits available under the Act. Registration would also ensure that identification documents or personal belongings of the domestic worker are not withheld by the employer.
- The procedure for settlement and recovery of wages from the employer should be simplified to facilitate the domestic worker.
- No incentive is available under the Act for an employer to register, Labour & Human Resource Department should provide some incentive to encourage employers to register themselves.
- Labour & Human Resource Department in collaboration with Local Government & Community Development Department should immediately establish Dispute Resolution Committee for the resolution of disputes between an employer and domestic worker.
- Government should notify the Appellate Authority under this Act as soon as possible.
- Government should notify the inspectors under this Act on priority basis.
- Government should notify the rules of the business of this Act without any delay.
- Labour & Human Resource Department in collaboration with Local Government & Community Development Department should train inspectors and members of Dispute Resolution Committee on handling cases of domestic workers.
- Labour & Human Resource Department should launch a media campaign to highlight the provision of this Act for influencing the behavior of the general public.
- Labour & Human Resource Department should coordinate with Child Protection and Welfare Bureau for cases involving violence against child domestic workers.
- The superior Judiciary should develop rules for dealing with children and labor issues involving children. This will provide guidelines to subordinate Judiciary including trial courts, labor courts, magistrates and other judicial bodies. The Governments should also follow the directions given by the Apex Courts, as Lahore High Court in a landmark judgment *Subay Khan vs. Secretary Labour Government of Punjab and Others* has not only explained law but also recommended the Provincial Government of Punjab to protect the rights of domestic workers in the province.
- Pakistan should ban child domestic labor, in light of Article 4 of Domestic Workers Convention, 2011 (No. 189).

- A day in the year may also be officially notified as a “Domestic Workers Day” along with the “Labour Day” to raise awareness about the plight of domestic workers and to share sympathies with these brave workers.
- Pakistan ratified Minimum Age Convention, 1973 (No. 138): on 06 July 2006 and must implement all articles of this Convention.
- Pakistan ratified the Worst Forms of Child Labor Convention, 1999 (No. 182) on 11 October 2001 and must implement all articles of this Convention.
- Pakistan ratified the Abolition of Forced Labor Convention, 1957 (No. 105) on 15 February 1960 and must implement all articles of this Convention.
- Pakistan must ratify Domestic Workers Convention, 2011 (No. 189).

Legislative Recommendations

- The law should be amended to provide 12 weeks of maternity leaves for the female domestic worker as it has been provided to employees under Punjab Employees Social Security Ordinance, 1965.
- The employer and employee relation's registration process should be simplified and legally effective through amendment in the law.
- The law should be amended to ban children below the age of 18 years from working as domestic workers. Child domestic labor should be considered as slavery-like practices and offence should be cognizable, non-bailable and non-compoundable.
- Punishment for employing a child as a domestic worker should be increased to create deterrence.



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