

A Legal Analysis of Minority Rights in Punjab Prisons: Discriminatory Dimensions of Rule 215

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Abstract

This paper highlights the unequal application of Rule 215 of the Punjab Prison Manual, which governs education-based remission for convicted prisoners. While the rule has been expanded to include religious minorities, its implementation remains structurally biased and institutionally exclusionary. The paper examines this discrimination through the lens of constitutional provisions, minority rights, and international human rights obligations. It explores the root causes of this disparity, including administrative negligence, lack of religious infrastructure, and policy gaps. Ultimately, it proposes legal and institutional reforms to ensure that the principle of equal protection is upheld within the prison system.

Keywords: Rule 215, Discrimination, Minorities, Constitutional Rights, Prison Reform.

Introduction

Prisons are not merely spaces of punishment—they reflect a nation's commitment to human dignity and equality. In Pakistan, the prison system inherited from colonial rule continues to suffer from systemic neglect, poor implementation of reforms, and overcrowding. While various commissions and international conventions have emphasized rehabilitation and humane conditions, the gap between policy and practice remains vast. According to Rule 199 of the Punjab Prisons Rules 1978, the remission system refers to “rules regulating the award of remission and the consequent shortening of sentences of prisoners.” However, religious minorities face institutional discrimination in accessing education-based remission benefits under Rule 215, despite constitutional guarantees and international human rights frameworks. This paper critically examines the exclusionary application of the remission system to non-Muslim prisoners and evaluates the reforms needed to align domestic practices with international obligations.

What is Remission and Grounds for Remission as per Pakistan Prison Rules, 1978

Remission is the complete ending of a sentence before the full term of your sentence has been completed.

Remission system is an arrangement by which a prisoner sentenced to imprisonment, whether by one sentence or by consecutive sentences, for a period of four months or more may by good conduct and industry become eligible for release when a portion of his sentence ordinarily not exceeding one-third of the whole sentence has yet to run.

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According to Longman Dictionary of Contemporary English (3rd Edition), “Remission” means a reduction of a time a prisoner has to spend in prison.

The remissions system is provided under Chapter 8 of Pakistan Prisons Rules (Jail Manual). In the aforesaid chapter, Rules 199 to 223 are germane to the grant of remissions. The remission system is defined under Rule 199 which means an arrangement by which a prisoner sentenced to imprisonment, whether by one sentence or by consecutive sentences for a period of four months or more may by good conduct an industry become eligible for release when a portion of his sentence ordinarily not exceeding one third of the whole sentence has yet to run. According to Rule 200, the nature of remission under the above rules may be ordinary or special while Rule 218 deals with the special remission awarded by Government on occasions of public rejoicing which is granted unconditionally under section 401(1) of the Criminal Procedure Code, 1898, which is not governed by these rules⁴.

Grounds of Remission under Punjab Prison Rules 1978

Good Conduct and Discipline

Prisoners demonstrating consistent good behaviour and adherence to prison regulations may earn ordinary remission on a monthly or yearly basis.

Performance of Prison Labour

Remission is granted to prisoners who engage actively and satisfactorily in prison-assigned labour or work in prison industries.

Educational Advancement

Prisoners who complete educational milestones—such as Matriculation, Intermediate, Bachelor’s, Master’s, or technical diplomas—while in custody can receive remission ranging from 2 to 10 months depending on their sentence and performance.

Religious Study and Memorization

Muslim prisoners who read, understand, or memorize the Holy Quran are eligible for remission. Minority prisoners may also earn remission through studying their own religious scriptures (e.g., Bible, Geeta, Granth), although implementation is inconsistent.⁵

Blood Donation

Convicted prisoners are entitled to a remission of 30 days for each instance of blood donation, with at least a six-month interval between donations (limited to four times for long-term inmates).

Teaching and Voluntary Services

Prisoners who voluntarily teach fellow inmates or contribute meaningfully to prison education or welfare may be granted special remission.

Presidential or Executive Remission

Under Article 45 of the Constitution, the President of Pakistan may grant special remission independent of prison rules.

⁴Mudassar Ahmed Khan v. The State, 2015 YLR 360

⁵Punjab Amendment-Enhanced Education Remission and Intensive Education System.

In sub-rule (i), in the Table IV, after S. No. (vt), following entry (vii) shall be inserted under the headings "S.No." and "Name of Examination" by Punjab Notifi. No. SO (MP) 9-1-G/2008 (P), dt. 4.8.2008. [PLD 2004-09 unreported statutes pt. I. p. 241]

Special Remission on Religious or National Occasions

Designated authorities (Superintendent, IG Prisons, Home Secretary, or Federal Government) may award special remission on festivals like Eid, Independence Day, or other state-declared occasions.

Commendable Conduct in Emergencies

Prisoners who act bravely in emergencies (e.g., saving lives during fire, riots, etc.) may be granted special remission as recognition for their courage⁶.

Religious Discrimination While in Captivity

Minority prisoners are unable to benefit from jail remission due to the absence of implementation of existing rules. The federal and provincial governments, except Punjab, have failed to approve the syllabus for the past 47 years, depriving minority prisoners of their right to remission in jail terms based on religious education and improved character. The provinces were sufficiently empowered to make their rules to implement all remedies that were available to the majority of prisoners. Hence, there is no excuse for continued discriminatory attitudes towards minority prisoners.

Relevant government authorities and human rights organizations, including the Punjab Prisons Department, the Ministry of Human Rights and Minorities Affairs, and independent civil society stakeholders, have raised concerns regarding the discriminatory implementation of jail remission rules for minority prisoners⁷. These bodies have contributed to the development of religious syllabi and advocated for equitable remission policies. Despite these efforts, a critical examination of remission practices in Punjab, Sindh, and Khyber Pakhtunkhwa reveals a consistent pattern of religious discrimination in the application of jail remission benefits across all provinces.

Violation of Constitutional Guarantees: Discriminatory Application of Rule 215 of the Punjab Prison Rules

The Constitution of Pakistan guarantees every citizen equal protection under the law, regardless of their religion or belief. Articles 20, 25, and 36⁸ specifically safeguard religious freedom, legal equality, and the rights of minorities. However, the way Rule 215 of the Punjab Prison Rules is implemented tells a different story. Although Muslim prisoners frequently receive remission for participating in religious education, such as reciting or studying the Holy Quran, non-Muslim inmates are seldom afforded equivalent opportunities or recognition for engaging with their own sacred scriptures, as no structured curriculum has been developed for them comparable to that available for Muslim prisoners. This unequal treatment directly undermines the constitutional promises of fairness and religious freedom. It highlights not just an administrative lapse but a deeper, systemic disregard for the dignity and rights of minority prisoners in Pakistan's correctional system.

Jail Remission Policies in Pakistan

Pakistan Prison Rules 1978 (chapter 8, Rule 199) outlines the remission system, which offers prisoners a reduction in their sentence up to a few months on the basis of their good conduct, hard work, and education. The jail remission encourages good behavior, discipline, and rehabilitation among prisoners as a reward for positive actions and helps motivate inmates to reform and reintegrate into society as responsible citizens. Punjab's jail remission policies are

⁶Chapter 8, Rules 198 to 223 of Pakistan Prison Rules, 1978

⁷Notification No. 11-5/2019(P-IV) dated 20 January 2023

⁸Constitution of Islamic Republic of Pakistan, 1973

governed by the Pakistan Prison Rules 1978. Its Rule 214 allows for special remission to be granted to prisoners for regularly performing prayers and observing fasts during Ramadan, entitling prisoners to a one-month remission. Rule 215 (vii) states that prisoners from minority religions, such as Hindus, Christians, and Sikhs, can earn remission by reading and understanding their religious books, like the “Geeta”, “Bible”, or “Grunth”, during confinement, and can avail remission up to six months. Special remission for religious observance is only for Muslim prisoners, separate from Ramadan related remission, leading to an unequal incentive.

The Sindh Prisons Corrections Service Act, 2019, outlines various religious study-related remission policies, like a three-month remission for prisoners who learn to read the Holy Quran during confinement. Prisoners who acquire proficiency in the meaning and fundamentals of Islam can receive remission for up to six months. Additional remission for prisoners who memorize the Holy Quran (Hafiz-e-Quran) is six months to three years. There is also a Special Remission in Rule 789 (ix) where prisoners who engage in regular prayers and observe fasts during Ramadan receive jail remission. The remission of three months of jail term for Hindu prisoners who read the Geeta and for Christian prisoners who read the Bible during confinement is given; however, there is no structured or approved curriculum for minority prisoners equivalent to that provided for Muslim inmates, which reflects unequal treatment based on religion and constitutes discrimination. The Prison Rules 2018 regulate jail remission policies in Khyber Pakhtunkhwa. Rule 215(ix) provided jail remission of four to twelve months upon passing an examination on the meanings of the Holy Quran and gaining proficiency in Islamic fundamentals. Non-Muslim prisoners could take an exam on knowledge of their respective Holy Books and religious fundamentals to qualify for the same remission. Additionally, a prisoner who learns the Holy Quran by heart or learns translation /Tafseer of the Holy Quran can avail the remission from six months to two years. Special remission is granted to prisoners for performing regular prayers and observing fasts during Ramadan.

Minority Prisoners: Does It Work?

In response to a Right to Information (RTI) application, the Inspector General of Prisons’ office disclosed that there were 1588 minority prisoners in the jails of Punjab in March 2025. Among these, 1315 were under trial, 232 were convicted, 34 were unconfirmed condemned prisoners, and seven confirmed condemned prisoners. However, 1,317 prisoners belonging to minority faith identities were confined in different prisons in Punjab in May 2023. There were 1144 prisoners under trial, 140 convicted, 26 unconfirmed condemned, and 7 confirmed condemned. In response to a Right to Information (RTI) application, the Inspector General of Prisons’ office shared that there were 27 minority prisoners (25 Christians, 2 Hindus) in the jails of Khyber Pakhtunkhwa as of March 2025. Among these, 26 were under trial, and one was convicted. According to the Punjab Prisons Department, 1,653 Muslim prisoners benefited from jail remission in 2022, 2023, and 2024 by reading and memorizing the Holy Quran. However, no minority prisoner received a similar remission.

According to the Khyber Pakhtunkhwa Prisons Department, 284 Muslim prisoners benefited from jail remission in 2023, 2024, and 2025 for studying the Holy Quran. However, no remission of a similar nature was granted to any minority prisoner.

Sindh Prisons & Corrections Service, informed that out of 19,447 total confined prisoners, 133 belonged to religious minorities on April 2022⁹ in response to an RTI application by Advocate Basam Ali Dahri on behalf of 10 Christian prisoners sent on 16 June 2023.

⁹<https://prisons.sindh.gov.pk/population-of-prisoners>

Table 1: Minority Prisoners by Province and Year (RTI-Based Data)

Province	Date	Total Minority Prisoners	Under-trial	Convicted	Unconfirmed Condemned	Confirmed Condemned
Punjab	May 2023	1,317	1,144	140	26	7
	March 2025	1,588	1,315	232	34	7
Khyber Pakhtunkhwa	March 2025	27 (25 Christians, 2 Hindus)	26	1	—	—
Sindh	April 2022	133	—	—	—	—

Table 2: Remission Based on Religious Education (2022–2025)

Province	Year(s)	Muslim Prisoners Granted Remission	Minority Prisoners Granted Remission
Punjab	2022–2024	1,653	0
Khyber Pakhtunkhwa	2023–2025	284	0
Sindh	Data not available	Not specified	Not specified

SOPs and Criteria for Prisoners' Remission: Punjab Home Department Notification

The Punjab Home Department issued SOPs and criteria for granting remission to prisoners. According to the spokesperson, remission allows early release under five categories: labour, good conduct, education, blood donation, and special remission. A prisoner with good conduct is entitled to 15 days' remission after one year with labour, and 30 days after three years. Educational achievements like Matric, Intermediate, Graduation, or Masters earn 6 to 10 months' remission. Memorising and translating the Holy Qur'an grants 6 months to 2 years' remission, while technical courses like electrician or beautician grant 1 month. Superintendents must submit cases within 7 days of result cards; DIG within 3 days. IG Prisons must notify remissions twice monthly and confirm that no cases are pending. Special remissions can be granted by various authorities, ranging from 30 to 90 days. Presidential remission under Article 45 overrides all other laws.

Prisoners who donate blood receive 30 days' remission, limited to four donations for those serving more than five years, with a 6-month gap between donations. Labour-based remission is granted four times a year for three months each. Those sentenced to less than four months with labour are ineligible. Remission also applies to death sentences commuted to life imprisonment. However, convicts of terrorism, sabotage, or anti-state offences are excluded. Delays in remission registration causing extra imprisonment will result in action under PEEDA against responsible jail officials.

Judicial Scrutiny of Discriminatory Application of Rule 215¹⁰

In a significant judicial development, a constitutional petition was filed in the Lahore High Court challenging the discriminatory application of Rule 215 of the Pakistan Prisons Rules 1978 with respect to religious minorities.

The Lahore High Court sought a report from the Punjab government regarding remissions granted to non-Muslim prisoners on the basis of education and memorising holy books. Petitioner Kashif Masih argued that while Rule 215 allows remission for Muslim prisoners who complete reading the Holy Quran, similar remissions are not extended to minority prisoners,

¹⁰*Kashif Masih v The State*

violating their constitutional rights. The counsel stressed that the Constitution protects the rights of all citizens, irrespective of caste, creed, or religion.

Table 3: Statistical Analysis of Minority Prisoner Representation and Remission Gaps

Category	Number of Prisoners	Remarks
Total Minority Prisoners	1,188	Includes Christians, Hindus, and Sikhs
Under-trial Prisoners	829	Awaiting trial
Convicted Prisoners	320	Serving sentences
Condemned Prisoners (Death Row)	39	Includes 1 Christian woman in Multan Women Jail
Granted Educational Remission	0	None received remission under Rule 215

He cited violations of Articles 9, 14, 20, 22, 25, and 26 of the Constitution, arguing for equal treatment and human dignity. The court directed the provincial law officer to submit replies on behalf of relevant departments by May 18.

Proposed Framework for Christian Religious Education and Remission Entitlement for Inmates in Punjab Prisons¹¹

The Christian Education and Remission System for prisoners in Punjab/Pakistan is designed to provide an opportunity for Christian inmates to deepen their spiritual knowledge, practice their faith, and earn remission based on the completion of various educational levels. Each course in the system is recommended to gradually increase in complexity, with increasing rewards in the form of remission days upon successful completion. However, this proposed curriculum is specifically tailored for Christian prisoners, while no similar educational framework has been recommended for other minority faiths such as Hinduism or Sikhism. This selective consideration reflects a discriminatory approach, depriving certain religious groups of equal access to remission opportunities under the prison system. Therefore, it is imperative that equivalent faith-based curricula be developed and approved for all minority communities to ensure fair and equal treatment in the application of remission policies.

Note: For teaching these courses, we can provide OTS (Open Theological Seminary) books as personal copies for all the inmates, along with the Bible.

The goal is to encourage spiritual growth, rehabilitation, and positive transformation in prisoners' lives. Upon completing each course, inmates will earn remission as outlined below:

Course 1

Introduction to Christianity (Basic Christian Education)

Objective: This course introduces the foundational aspects of Christianity, its beliefs, and practices. Prisoners will be equipped with the basic knowledge of Christian teachings.

Remission Awarded: 15 days

Topics Covered

1. Introduction to the Bible: Overview of the Old and New Testaments, understanding the structure of the Bible.
2. Life and Teachings of Jesus Christ: The significance of Jesus Christ in Christian faith, His life, death, and resurrection.

¹¹ The Remission course was designed, and suggested by church of Pakistan Lahore, Diocese.

3. Christian Doctrine Basics: Key doctrines such as the Trinity, salvation, sin, grace, and forgiveness.
4. The Role of Prayer: Different types of prayer (e.g., praise, thanksgiving, supplication) and their importance.
5. The Church and its Functions: Understanding the role of the Church in the Christian life, sacraments, and community worship.

Assessment

- Written/Oral test covering the core teachings of Christianity.
- Group discussions and practical exercises (e.g., prayer sessions).

Course 2: Christian Living and Ethics

Objective: This course focuses on how to apply Christian teachings in daily life, with a strong emphasis on ethical conduct, morality, and living according to Christian principles.

Remission Awarded: 15 days

Topics Covered

1. The Ten Commandments: In-depth study of the Ten Commandments and how they guide Christian behaviour.
2. The Fruits of the Spirit: Understanding the qualities that Christians should exhibit in their daily lives (e.g., love, joy, peace, patience, Galatians 5: 22-23).
3. Forgiveness and Reconciliation: Exploring the importance of forgiving others and seeking forgiveness.
4. Christian Morality: Moral dilemmas and how to make ethical decisions based on Christian teachings.
5. Social Responsibility: Christian approach to charity, helping others, and fulfilling social obligations.

Assessment

- Personal reflection essays.
- Practical assignment on forgiveness and reconciliation.

Course 3: Christian Theology and Church History

Objective: This course introduces a more detailed study of Christian theology, key historical events in the Church, and the development of Christian beliefs over time.

Remission Awarded: 30 days

Topics Covered

1. *Theology of the Trinity:* Detailed study of the Father, Son, and Holy Spirit.
2. *Early Church History:* The formation of the early Christian Church and the spread of Christianity.
3. *Christian Councils and Creeds:* Understanding the major councils and creeds (e.g., Nicene Creed) that shaped Christian theology.
4. *The Life of Saints and Martyrs:* Studying the lives of key figures in Christian history who exemplified faith and sacrifice.
5. *Christian Denominations:* Overview of the different branches of Christianity (e.g., Catholicism, Protestantism, Orthodoxy) and their differences.

Assessment

- A comprehensive test on theology and church history.

- Group presentation on a historical Christian figure.

Course 4: Advanced Christian Discipleship and Leadership

Objective: This course focuses on deeper aspects of discipleship and leadership within the Christian faith, preparing inmates for spiritual leadership roles within their communities.

Remission Awarded: 60 days

Topics Covered

1. *Spiritual Disciplines:* Study of prayer, fasting, worship, and other spiritual practices that strengthen Christian life.
2. *Christian Leadership:* The qualities of a good Christian leader, including humility, service, and integrity.
3. *Evangelism and Outreach:* Understanding the importance of spreading the Christian faith and the methods of evangelism.
4. *Serving the Community:* Practical ways to serve others through Christian love, care, and support.
5. *Preparing for Life after Prison:* How to live a Christian life upon release, including handling challenges, building relationships, and remaining faithful.

Assessment

- Written/Oral test on discipleship and leadership.
- Practical service project (e.g., organizing a small charity event or helping fellow inmates).

Course 5: Mastery in Christian Faith and Service

Objective: This course is for those who want to deepen their understanding and commitment to Christianity at an expert level. It is designed for those who have already gained advanced knowledge and wish to become mentors or leaders in their faith (after prison).

Remission Awarded: 69 days

Topics Covered

1. *Advanced Biblical Studies:* Detailed study of specific books of the Bible, exploring deeper meanings and applications.
2. *Christian Ethics and Society:* How to address complex ethical issues in modern society from a Christian perspective.
3. *Mentoring and Discipleship:* How to mentor others and disciple new believers.
4. *The Role of Christian Faith in Social Justice:* Exploring how Christianity addresses issues such as poverty, inequality, and human rights.
5. *Global Christianity and Interfaith Dialogue:* Understanding the role of Christianity in a global context and how to engage in interfaith dialogue.

Assessment

- A final Assignment on a specific aspect of Christian faith.
- Role-play of a mentoring or discipleship scenario.

Upon completion of all five courses, inmates/participants will have gained a comprehensive understanding of the Christian faith, from its foundational beliefs to advanced theological concepts. The remission system provides a significant incentive for prisoners to engage in spiritual education and rehabilitation, offering them a pathway to personal transformation, spiritual growth, and a renewed sense of purpose.

This structured Christian educational program not only benefits the individual prisoners but also contributes to fostering a more positive and spiritually enriched environment within the prison system.

Policy Recommendations for Ensuring Equal Remission Rights for Minority Prisoners

1. Several minority prisoners are illiterate; therefore, they need to start education, formal or religious, with basic literacy. Hence, some efforts would be needed to bring them to par with the majority of prisoners to avail their rights equally. Therefore, civil society groups specializing in these areas should be allowed to extend their services to minority prisoners about the remission rules and procedure for formal and religious education.
2. The Prisons Departments should ensure that segregated data on minority prisoners is accessible easily. Moreover, it must regularly collect and publish updated data on jail remission across different religious groups to monitor fairness and identify discrepancies.
3. Amend provincial prison rules to grant non-Muslim prisoners' remission for observing their religious practices, such as fasting (Lent season for Christians, Navratri for Hindus) or attending regular prayers.
4. Ensure that remission for religious study is equivalent for non-Muslim prisoners to receive the same benefits for reading, memorizing, or understanding their holy scriptures as Muslim prisoners do for Quranic study.
5. Implement an oversight mechanism such as independent prison commissions or human rights bodies through the Ministry of Human Rights, the National Commission for Human Rights (NCHR), or Provincial Human Rights Departments to ensure the equitable and non-discriminatory application of remission policies across all religious groups.
6. Include minority faith teachers and chaplains in prisons to provide regular access to religious education for minority inmates, creating a fair ground for religious remission eligibility.
7. Develop standardized curricula for religious education across faiths, approved by relevant religious and educational authorities, to institutionalize equivalent educational benchmarks for remission.
8. Establish legal aid clinics inside prisons or in collaboration with civil society to educate minority prisoners about their remission rights and provide assistance in filing appeals where needed.
9. Introduce mandatory annual audits of remission data, disaggregated by religion and sentence type, through the Public Accounts Committee (PACs) to ensure accountability and transparency in remission practices.
10. Provide sensitivity and anti-discrimination training to prison staff to reduce institutional bias in implementing remission and rehabilitation programs.
11. Amend the language and structure of Rule 215 of the Punjab Prison Manual and similar rules in other provinces to explicitly ensure religious equality in education-based remission schemes.
12. Empower provincial and national human rights commissions to carry out independent, unannounced inspections of prisons to assess the fairness and inclusivity of remission policies.

Conclusion

This research establishes that the application of Rule 215 of the Punjab Prison Manual, although seemingly inclusive in its text, remains discriminatory in practice against religious minority prisoners. The state's failure to institutionalize equivalent religious educational frameworks, provide access to minority faith instructors, and implement procedural parity has resulted in a systematic denial of remission rights to non-Muslim prisoners. These omissions

are not merely administrative shortcomings; they constitute a violation of the fundamental rights enshrined in Articles 9, 20, 22, and 25 of the Constitution of Pakistan. Moreover, they fall short of the international standards set by the Universal Declaration of Human Rights (UDHR), International Covenant on Civil and Political Rights (ICCPR), and the United Nations Standard Minimum Rules for the Treatment of Prisoners (Nelson Mandela Rules).

The denial of remission on equal terms compromises not only the ideals of justice and equality before law but also undermines the rehabilitative objectives of the correctional system. The discriminatory enforcement of Rule 215 reinforces systemic exclusion and perpetuates religious inequities, thereby weakening public confidence in the criminal justice system. A rule that was designed to incentivize reformation and reintegration has, instead, become a reflection of institutional disparity. It is imperative that the remission system transcends its current majoritarian focus and evolves into a mechanism that is uniformly accessible, regardless of religious identity.

To rectify this, a rights-based and inclusive framework must be urgently adopted. Key policy imperatives include:

- *Legislative Harmonization:* Amend prison rules across all provinces to explicitly recognize equal remission entitlements for religious minorities—ensuring parity in both educational and religious observance-based remissions.
- *Curriculum Development and Implementation:* Expedite the approval and institutionalization of standardized religious education curricula for non-Muslim inmates, with corresponding access to faith-based educators and chaplains.
- *Independent Oversight Mechanisms:* Establish autonomous prison oversight bodies, including representatives from minority communities, human rights institutions, and civil society, to monitor and enforce equitable remission policies.
- *Training and Capacity Building:* Institutionalize anti-discrimination and constitutional literacy training for prison staff to ensure equal treatment and prevent systemic bias in remission-related decision-making.
- *Data Transparency and Disaggregation:* Mandate collection, publication, and regular audit of disaggregated remission data by religion, education, and sentence type to improve accountability and evidence-based reform.
- *Legal Empowerment of Inmates:* Facilitate the establishment of in-prison legal aid clinics to educate inmates about their remission rights and to assist in filing relevant applications or grievances.

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