

FROM SAFETY ON PAPER TO SAFETY IN PRACTICE

AN IMPACT ASSESSMENT OF THE FEDERAL AND
SINDH JOURNALIST SAFETY COMMISSIONS AND THEIR
CAPACITY AND OPERATIONAL CONSTRAINTS



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Disclaimer: This report has been prepared in good faith, based on stakeholder consultations, to identify practical ways of strengthening the federal and Sindh journalists' safety commissions through policy reform, institutional capacity-building and adequate resourcing. Its purpose is to support both Commissions in fulfilling their statutory responsibilities under the federal and Sindh laws governing the safety of journalists and other media professionals.

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Executive Summary

Pakistan has taken an important step toward making journalist safety a public responsibility. Sindh enacted the Sindh Protection of Journalists and Other Media Practitioners Act, 2021; the national Parliament subsequently enacted the Protection of Journalists and Media Professionals Act, 2021. The provincial law established a commission through which journalists could seek protection and through which authorities could monitor attacks and pursue responses. The federal law envisaged its own commission. These measures sit within a wider international effort, led by the 2012 United Nations Plan of Action on the Safety of Journalists and the Issue of Impunity, to move from condemning attacks toward preventing them, protecting journalists, and securing accountability. The most directly relevant Sustainable Development Goal measure is indicator 16.10.1, which tracks verified attacks on journalists and other specified groups.

The need remains acute. Reporters Without Borders ranked Pakistan 153rd of 180 countries in its 2026 World Press Freedom Index and describes continuing killings and impunity. Such rankings do not measure the effectiveness of either commission, but they explain why an institution must offer more than a place to receive complaints: it must make journalists safer when a threat develops and pursue an account of what happened after an attack.

This study examines the distance between that promise and journalists' experience. A baseline survey of approximately 40 working journalists in Sindh, including respondents from interior and rural areas, found that 70% knew a provincial protection law existed, yet 65% did not know where to find the Commission's office, contact information, website, or complaint route. Sixty-five percent reported experiencing a work-related threat or interference since 2021. The survey revealed that only around 1% of those reporting an incident took it to the Commission.

Consultations gave those numbers a human explanation. Union leaders described a body with little visibility outside Karachi and a slow response to urgent threats. Serving nonofficial Commission members described dependence on police replies, reluctance among journalists to approach official channels, and media employers who seldom supply the support that journalists need. The Commission chairperson disputed the suggestion that journalists lack trust in the body. He reported improvements in police coordination, an office and online presence, case activity, and plans for outreach. The different accounts point to a practical test: whether journalists can find a safe way to contact the Commission, receive a timely response, and see what happened to their complaint.

A notified Commission still building its capacity

Federal Commission chairperson Kamal Uddin Tipu described a Commission without the basic means to work independently. It has no fully functioning secretariat yet, no dedicated staff except personal assistant (PA) to the chairman in late August 2026, no settled independent budget and no consistently usable office. Administrative arrangements remain tied to the Ministry of Information in a high-security zone that, according to Tipu, restricts easy public access. The Commission has prepared digital systems, including a website, official email, e-office and a complaint-management platform, but systems cannot investigate a threat, update a complainant or secure action from another authority without staff and financial control.

“The Commission needs its own budget, its own staff, its own office, and administrative autonomy.”

Said Kamal ud din Tipu, Chairperson, Federal Commission

Membership turnover has made the problem worse. The original composition did not remain intact. The National Press Club subsequently elected new leadership; nominees linked to representative bodies changed every year or two years; officials serving by virtue of government posts were transferred or reposted; some terms ended; and other nominations remained pending. Because replacement or fresh notification takes time, the Commission has not developed continuity, institutional memory or a stable working membership. Tipu is, therefore, not simply chairing an under-resourced body. In practical terms, he is trying to create an institution whose members, support staff and administrative foundations remain unsettled.

The federal chairperson’s account shows why notification alone has not given journalists a dependable route to protection. When a complainant cannot identify a stable office or reach an assigned intake officer, formal establishment does not yet amount to a functioning remedy. The federal assessment therefore examines the chairperson’s description of the Commission’s membership, premises, staffing and digital preparation, and asks what those arrangements permit the institution to do when a journalist reports an urgent threat.

Activity without a dependable response chain

Sindh has travelled further. The provincial government constituted the 14-member Commission in November 2022. Justice (retired) Rashid A. Rizvi became its first chairperson. After his death, Justice (retired) Nazar Akbar served as chairperson and later resigned. The Sindh Cabinet appointed retired bureaucrat Aijaz Ahmed Memon on 4 December 2024. This history matters because participants consistently distinguished the personal initiative shown during Justice Rizvi’s tenure from the slower, more departmental character they later experienced.

Union representatives did not argue that Sindh should abolish the Commission. They argued that it must stop handling urgent safety complaints like ordinary government files. Tahir Hassan Khan said that he had personally forwarded approximately five to seven complaints, principally involving threats. Months later, he received substantially the same answer that the police station would have supplied. He described irregular meetings, inadequate staffing and dependence on an Information Department officer performing secretarial work.

“The answer that an SHO used to give us, the same answer came from the Commission after many months.”

Tahir Hassan Khan, journalist-union representative.

Commission members and media stakeholders made the same point from inside the institution. Their concern did not focus only on the Commission’s legal power to recommend action. It focused on what happens when police, government departments or media houses ignore a recommendation. Mazhar Abbas and other Commission members described a system in which letters move through routine channels, responses arrive late, and the Commission lacks a clear consequence for non-cooperation. They called for stronger authority, regular meetings, a professional secretariat, visible complaint channels, wider regional reach and closer follow-up in serious cases. The phrase “toothless body” captured this enforcement problem, but their discussion remained reform-oriented: they wanted a Commission capable of making its intervention matter.

Central finding

The report reaches a simple conclusion. Pakistan has created an important legal promise, but neither jurisdiction has completed the chain from right to remedy. Federal authorities must first create a real institution around the Commission they notified. Sindh must make an existing institution independent, accessible, time-bound and consequential. Both systems should judge performance by one question: what changed for the journalist because the Commission became involved? Meetings, notices and letters matter only when they lead to protection, credible investigation, informed follow-up or accountability.

Methodology

The research drew on the two 2021 laws, a baseline survey of approximately 40 journalists in Sindh, and 40 who participated in a survey concerning consultations with union leaders and nonofficial Commission members in Karachi, a visit to the Sindh Commission, a separate interview with Director General Information Dr. Moezuddin Pirzada, and an interview with federal chairperson Kamal Uddin Tipu. The Sindh survey included working journalists beyond major urban centres and explored awareness of the law, knowledge of its safeguards and complaint channels, threats since 2021, reporting behaviour, trust, and information provided by employers.

The first consultation included union representatives, including Tahir Hassan Khan and Lubna Jerrar Naqvi. The second brought together serving nonofficial Commission members Mazhar Abbas of the Pakistan Federal Union of Journalists, Dr Tauseef Ahmed of the Human Rights Commission of Pakistan, Kazi Asad Abid of the All Pakistan Newspapers Society, and Maqsood Yousafi of the Council of Pakistan Newspaper Editors, together with bureau chiefs Tariq Moin and Aslam Khan. The research also sought institutional information on staffing, budgets, complaints, outcomes and cooperation. The federal ministry did not supply a completed institutional questionnaire despite the reported commitment conveyed through its Principal Information Officer, so the federal findings rely chiefly on Tipu's account and available institutional information. The Commission visit and the Information Department interview remain distinct parts of the Sindh research.

The Sindh survey is a small baseline, not a representative estimate of all journalists in the province; reported percentages describe the respondents to each question and may use different denominators. The consultations convey participants' experiences and assessments, while the chairpersons and the Director General explain the positions of their respective institutions. Where accounts differ, the report presents each position and identifies the action that could establish what happened. '\$.

Baseline survey: the gap between knowing the law and reaching protection

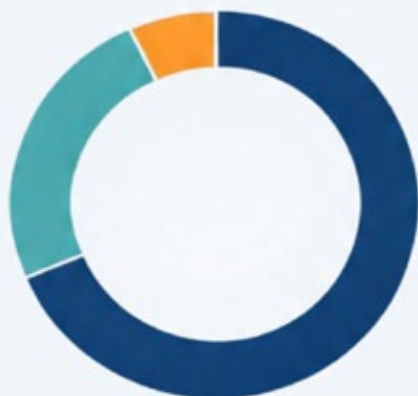
Baseline survey: the gap between knowing the law and reaching protection

Sindh: awareness falls as questions become practical

The Sindh survey captures a sharp falloff between recognizing the law and using it. Seventy percent of respondents knew Sindh had passed a journalist protection law; 24% did not, and the remainder were unsure. Sixty percent described themselves as only somewhat familiar with the protections available, and approximately 40% said they were unfamiliar with the Commission. Sixty-five percent did not know how to locate its office or complaint channels.

Awareness is high but access is low

The Sindh survey shows a sharp dropoff between knowing the law and using it.



70% Knew Sindh had a journalist protection law

24% Did not know

6% Unsure



60%

described themselves as only somewhat familiar with the protections available.



40%

said they were unfamiliar with the Commission.



65%

did not know how to locate its office or complaint channels.

Exposure to danger makes that access problem consequential. Sixty-five percent said they had faced a work-related threat, harassment, violence, intimidation, online abuse, pressure to disclose a source, or other interference since 2021. Among those who faced an incident, 33 percent told no one, 27.8 percent reported it to a union, and the working results recorded approximately one percent reporting to the Commission. In a separate question, 46% had never considered filing a Commission complaint and 35% considered it but did not proceed.

Threats are common, but reporting is rare

Exposure to danger is high, yet many journalists do not report incidents or file complaints.



said they had faced a work-related threat, harassment, violence, intimidation, online abuse, pressure to disclose a source, or other interference since 2021.

Among those who faced an incident:



Told no one



Reported it to a union



Reported to the Commission

Considering a Commission complaint



Had never considered filing a complaint



Considered it but did not proceed

When asked whom they trusted most after an attack:



30%

Unions



24%

Press clubs



24%

Senior journalists



51%

said their employers had not informed them about safety procedures, emergency contacts, insurance, legal assistance, or complaint mechanisms.

When asked whom they trusted most after an attack, 30% chose unions, 24% press clubs, and 24% senior journalists. Fifty-one percent said their employers had not informed them about safety procedures, emergency contacts, insurance, legal assistance, or complaint mechanisms. The result suggests that journalists first turn to people they know, while the statutory body remains remote. It also suggests a practical outreach route: unions and press clubs already have the relationships on which a functioning referral network could build.

The survey separates recognition of the law from knowledge of what to do with it. A journalist may remember that the Assembly passed a protection statute while remaining uncertain whether a threat from a local official, online abuse, pressure to reveal a source, or an employer's failure to help falls within the Commission's work. Even a reporter who has heard of the Commission may not know whom to contact or whether the complaint will pass through a district official with local relationships. The 35% of respondents who considered

complaining but did not proceed provide a particularly important group for follow-up interviews: they had identified the institution as a possibility, yet something prevented the next step. The questionnaire does not ask what stopped them. Fear, trust, inconvenience, poor information, and dissatisfaction with outcomes remain hypotheses that the consultations help generate, not facts the survey proves.

Federal Commission: notification without a working secretariat

3.1 The legal delay became an operational delay

Parliament enacted the federal law in 2021, but the federal government took longer than expected to notify the Commission in 2025. The federal cabinet approved Kamal Uddin Tipu's appointment as chairperson on 18 June 2025, and the Commission was publicly established later that year. Notification ended a prolonged establishment delay, but it exposed another problem: the government created the legal body without giving it the administrative structure needed to perform its mandate.

Tipu's interview presents an institution still negotiating the essentials. Posts may exist on paper, but recruitment has not produced a working secretariat. According to Tipu, office space became available after Freedom Network sent its questionnaire. Even after premises became available, practical issues involving access, keys, furniture and infrastructure impeded use. No settled independent budget allows the Commission to recruit, procure, investigate, travel or run outreach on its own authority at the time of the interview.

The Commission is without a functioning secretariat

The absence of other stable institutional voices in this report reflects the Commission's condition, not a narrow research choice. After notification, the National Press Club in Islamabad elected new leadership. Representative bodies changed nominees. Officials who sat on the Commission because of their government positions were transferred or reposted. Other members resigned, completed terms or awaited nomination and notification. Every change required another administrative step. The result is a body whose composition on paper does not translate into a consistently available working membership.

This instability prevents the Commission from building institutional memory. Members cannot develop a shared approach to urgent risk, confidentiality, admissibility, investigation or escalation if membership changes faster than procedures mature. It also places disproportionate responsibility on the chairperson. A statutory commission should continue to function when one member leaves, one department transfers an officer or one representative organization holds an election. The current model has not yet achieved that resilience. Digital preparation cannot replace staff

Tipu described a lean model rather than a large bureaucracy. He said a small team could screen complaints and reserve full investigation for the cases that require it. The Commission prepared a website, e-office, official email and complaint-management infrastructure at limited cost. That work shows initiative and offers a practical basis for expansion.

But technology only moves information. It cannot decide whether a death threat requires immediate police protection, interview a journalist confidentially, test an official response, preserve digital evidence or explain a closure decision. Launching a portal without caseworkers risks creating the appearance of access while complaints accumulate behind the screen. The federal government should, therefore, link every public complaint channel to named staff, published service standards and an interim urgent-response protocol.

Tipu's account also illustrates a distinction between the formal constitution of a commission and its ability to respond on an ordinary working day. An office that journalists cannot enter readily, a complaint address without an intake officer, or a roster whose members require fresh nomination after each organizational election may satisfy a discrete administrative requirement without providing anyone to assess a threat. The practical sequence therefore matters more than the formal inventory: who receives an urgent message, who determines whether the journalist faces immediate risk, who can contact a senior official, and who updates the journalist after that official responds? Until the government supplies staff and financial authority to answer those questions, a low-cost digital platform can publicize the existence of a remedy that the institution cannot consistently deliver.

The chairperson's preference for a lean team offers an achievable starting point, but lean operations still need assigned responsibilities. A small permanent intake and case-management unit could separate urgent protection requests from routine submissions, preserve confidential information, coordinate with relevant agencies, and place complex cases before the Commission. Stable membership would then allow the Commission to adopt a consistent standard for how it treats a police denial, a demand for source information, a cybercrime notice, or a complaint against a powerful employer. These are institutional choices that a chairperson cannot reliably make and implement alone, especially while representatives and ex-officio officials change and the ministry has not supplied a complete response to the institutional questionnaire.

Weeks after Freedom Network sent a questionnaire to former Principal Information Officer Mubashar Hassan to seek the federal government's responses on its duty to support the Commission for Protection of Journalists & Media Professionals Pakistan [CPJMP], the commission's chairperson, Kamal Uddin Tipu, shared "good news" – the support he was waiting for finally arrived – on 24 August 2026.

He told Freedom Network that the commission got two offices – one for the commission and other for the secretary on the premises of the Federal Ministry for Information and Broadcasting.

The chairperson was provided a personal assistant and an official vehicle after months-long advocacy to help the commission fully operational. “The offices (were) handed over three days ago (21 August 2026),” Mr Tipu said. The drawing of the commission’s website is ready. However, its launch is awaited. On 01 September 2026, the commission held a meeting and the chairperson told the meeting that the government approved Rs90 million budget for 2026-27 financial year and approved 16 positions against 19 requests.

Federal assessment

The federal system has achieved formal establishment, while its chairperson describes serious operational gaps. It needs a dedicated budget, a permanent secretariat, secure and accessible premises, stable membership, rules, thematic experts and a live complaint process. Until those elements exist together, the federal Commission cannot demonstrate effective protection. Its present condition creates an access problem that the Commission must address before its complaint channels can provide dependable protection.

Sindh Commission: activity without a reliable response chain

Institutional history

Sindh enacted the country's first journalist-safety law in 2021. The provincial cabinet approved the 14-member Commission on 16 November 2022 and appointed Justice (retired) Rashid A. Rizvi as its first chairperson. The Commission began operating in early 2023. Public reporting from that period records complaints being processed and contact with police, FIA and other security bodies. Justice Rizvi also publicly pressed the government to provide the office, staff and funds required to make the Commission effective

After Justice Rizvi's death, Justice (retired) Nazar Akbar succeeded him and later resigned. On 4 December 2024, the Sindh Cabinet appointed retired bureaucrat Aijaz Ahmed Memon. The changes created three leadership phases in a short institutional life. Stakeholders repeatedly treated the first phase as the strongest because Justice Rizvi used personal authority and independence to move matters despite limited infrastructure. That praise also reveals a weakness: performance depended too heavily on the individual chairperson.

What unions and journalist bodies observed

Union representatives began with a problem of reach. Journalists in rural and interior districts face the most direct pressure from local political actors, police, religious groups and criminal networks, but safety training, legal support and institutional access remain concentrated in urban centres. One participant explained that threatened journalists may avoid direct reporting because they fear further exposure. They first contact a union, a trusted senior journalist or an organization that can approach authorities on their behalf.

"People are afraid to complain. Their fear is that this may become a problem for us." Fear, therefore, operates before any formal complaint reaches the Commission. In rural districts, a journalist may have to complain about the same police officer, political actor, religious group, or influential person who can intensify the threat. A safe mechanism must permit confidential first contact and filing through a trusted representative.

Lubna Jerrar Naqvi, General Secretary Karachi Union of Journalists, located the access problem in the relationship between Karachi and the rest of Sindh. She said campaigns about new institutions tend to remain in urban centres even as journalists in peripheral districts bear serious risks, and she described learning about attacks through union networks or

social media while affected journalists hesitated to file formal complaints. Her proposed response distributed responsibility across unions, civil society, media organizations, and journalist representatives on the Commission: civil society could help resource campaigns, while Commission members could travel to regional press clubs and explain how to use the protection mechanism. Because unions have limited funding, asking them alone to publicize the statute would leave the current gap intact.

Lubna's experience as a regional contact for the International Federation of Journalists gave this observation a second dimension. She could learn of an attack through an established network even when the person directly affected stayed away from a formal process, which means a Commission that measures demand only by the complaints it receives may underestimate the need for protection. A report passed among journalists can alert a union without authorizing it to disclose a name or file a complaint, and a public social-media account may circulate faster than the institution can verify the underlying event; an effective outreach arrangement would have to respect both realities. The Commission could train trusted regional contacts to explain available options and obtain consent for a referral, while reserving a direct channel for journalists who do not want to pass through their local union or information officer. This would use existing relationships without assuming that every journalist trusts the same intermediary.

Rehan Khan Chisti of Karachi Union of Journalists (Dastoor) described the Commission as having "zero visibility," referring to uncertainty about its chairperson, secretary, and procedures. This was more than a complaint about publicity. In his account the Commission needed to meet journalists in ways that would build familiarity before a crisis, because a journalist who has never encountered the institution must decide whether to trust it at the worst possible moment. Several union representatives themselves asked who chaired the Commission, an observation with particular weight because unions often serve as the first point of contact for threatened journalists. A regional representative needs to know a named Commission contact, the kind of response to expect, and whether that contact remains available when an emergency arises.

The Commission's reported plans to distribute printed material speak to part of Rehan's concern, but a leaflet alone cannot establish the confidence required to disclose a politically sensitive threat. A useful presence would combine a recognizable contact with regular meetings outside Karachi, an explanation of who can see a complaint, a demonstration of how the portal works, and an opportunity for journalists to ask what the Commission did in earlier cases. The fact that union representatives asked who chaired the body also raises a reciprocal question for the Commission's journalist members: what information have they taken back to the organizations that nominated them, and what difficulties have those organizations brought into Commission meetings? Visibility becomes meaningful when communication runs both ways, not only when the institution advertises its address.

The unions accepted that they must inform their members, but they rejected the idea that awareness rests on them alone. They lack the funds and province-wide administrative reach of the Commission. They proposed a simple, visible campaign: complaint information in

every media house and press club, regional sessions, union focal persons, a public telephone number and a Commission team that travels beyond Karachi. As one participant observed, the Commission had not even placed “a small banner in the media houses” telling journalists where to complain.

“So far, they have not even put up a small banner in media houses that there is a commission for journalist protection. If you have any complaints, let us know.” said a participant

This evidence places complementary duties on the Commission and representative bodies. Unions can supply trust and local knowledge, but the Commission must finance, coordinate and institutionalize province-wide access rather than treating voluntary networks as a substitute for its own reach.

Tahir Hassan Khan then moved the discussion from awareness to experience. He said he had personally submitted about five to seven complaints, mostly concerning threats. The Commission sent letters, waited and eventually returned the same police account that an SHO would have produced. In one instance, the response denied the complaint and labelled the journalist a “blackmailer.” His criticism was precise: referral did not create independent review, urgency or a better result. Khan’s account supplies a direct user test of the mechanism. The Commission added delay but did not add independent scrutiny. If it merely forwards a complaint and reproduces the police response, it does not perform the specialized review that justified creating it.

“There is no process. There is no process.” said Tahir Hassan Khan. The repetition is significant. Khan did not describe one adverse decision. He described the absence of a visible sequence governing acknowledgment, risk assessment, referral, investigation, follow-up, escalation and closure.

“There are many mafias, criminal mafias. At least there should be a mechanism so that the journalist who is being threatened realizes that notice has been taken.” said Tahir Hassan Khan.

He also linked delay to internal capacity. Meetings could lapse for two or three months. The Commission lacked staff. An Information Department officer is performing the secretary’s function in addition to other duties. This arrangement placed an urgent protection body inside the rhythm of ordinary departmental work. He did not propose abandoning the Commission. He repeatedly said it was needed and should be made effective.

His criticism requires attention to two separate delays. The first occurs before the police receive an urgent request, if staff wait for an ordinary meeting or send correspondence through several desks; the second occurs after the reply arrives, if the Commission treats a denial as the end of its inquiry without returning to the journalist or identifying the evidence on which the denial rests. A direct conversation between a press club leader and a senior officer may bypass the first delay, but it cannot provide the consistent record, follow-up, and broader accountability that a statutory institution should offer. The Commission’s comparative

advantage should lie in combining an immediate escalation route with a documented obligation to keep the complainant informed, particularly when the account supplied by an authority conflicts with the reporter's description of a threat.



Freedom Network representative in discussion with union leaders in Karachi Press Club. Photo by Freedom Network

What Commission members and media stakeholders observed

The second Karachi consultation brought together serving nonofficial Commission members Mazhar Abbas of the Pakistan Federal Union of Journalists (PFUJ), Dr Tauseef Ahmed of the Human Rights Commission of Pakistan (HRCP), Qazi Asad Abid of the All-Pakistan Newspapers Society (APNS), and Maqsood Yousafi of the Council of Pakistan Newspaper Editors (CPNE), along with Tariq Moin of Geo News and Aslam Khan of Samaa News. They approached the Commission from different positions: APNS speaks for publishers, CPNE for editors, PFUJ for journalists, HRCP for human rights, and the bureau chiefs work within news organizations. Their shared criticism of weak employer support therefore deserves particular attention, because several participants also have routes through which they can encourage the media organizations they represent or serve to act.

Mazhar said many nonofficial members considered the Commission ineffective, and argued that taking a serious case through to a demonstrable outcome would do more to build confidence than merely recording meetings or issuing letters. He also identified a “fear factor” in interior Sindh: a journalist may hesitate to use a regional information officer when a complaint concerns a powerful local figure and disclosure could intensify the risk. His point connects the survey’s finding that many journalists could not locate the Commission with a harder question about whether they would trust the available route even if they found it. A confidential means of approaching the Commission, a named person to assess urgency, and regular information for the complainant would give regional journalists a genuine choice about how to seek help.

Participants then described the weakness that appears after the Commission refers to a case. An authority can delay, send a routine denial, or dispute a journalist's account while the underlying threat remains; one participant said that the Commission could recommend action against police officers to the Chief Secretary but questioned what it could do beyond that recommendation. Mazhar wanted the Commission to examine the response, pursue an inadequate answer and make its intervention consequential without claiming the police's investigative role or a court's power to determine guilt. A senior police focal person may shorten the route to an answer, but it does not resolve this criticism unless the Commission also records what happened to the journalist after the answer arrived.

Dr Tauseef traced the problem through the Commission's leadership. He recalled that Justice Rashid Rizvi pursued urgent matters despite having little infrastructure, whereas later cases seemed to move through ordinary departmental correspondence; in one example, he said staff asked for a press card and other papers before offering to write to the superintendent of police, a response he summarized as "Let us write to the SSP." He and Maqsood favoured leadership drawn from senior judges or journalists rather than retired bureaucrats, while other participants emphasized the wider need for independence, dedicated staff and regular meetings. Appointment criteria may influence leadership, but a durable answer also requires a procedure that lets the Commission assess danger immediately, obtain routine documents in parallel, and continue following the case after its first letter.

The discussion of a journalist murder in Ghotki showed why the Commission may need to examine the work-related context independently of the criminal prosecution. Dr Tauseef described a lawyer for the family who reportedly faced intimidation at hearings and sought proceedings in Karachi; participants also questioned whether a police account clearing a politically connected person had ended the Commission's inquiry too soon. The particular allegations and procedural history require the case record. The broader task is clear: the Commission can ask about the journalist's recent reporting, threats and assignments, hear the family or counsel, identify omissions in an official account and communicate its findings to competent authorities, without deciding criminal guilt. As one participant put it, the criminal case and the Commission's own findings perform different functions.

Qazi called the Commission "toothless" and described an attack on the office of his newspaper, Ibrat, after which he said no Commission representative visited for eight months. He acknowledged that he might have raised the matter more actively and said the newspaper conducted its own inquiry. His experience raises a question for both sides: what did the paper provide about the attack and the risks to its journalists, and what contact, independent inquiry or protective step did the Commission undertake? Qazi's role within a publishers' association also gives him a means to encourage other outlets to preserve assignment information and support affected reporters, while the Commission can test an employer's account against what those reporters say.

Mazhar likewise argued that after a journalist's murder, the employer should explain the reporter's beat, recent assignments and known threats rather than leave the police to assess motive without editorial context. He cited Wali Khan Babar's case and recalled union work

on it; Tariq Moin placed greater emphasis on the persistence of Babar's family, especially his brother, and urged unions to follow cases beyond the first public response. Tariq also described journalists defending PECA proceedings with little legal or financial help from their employers. These perspectives converge on a practical point: a family should not have to sustain accountability alone when the newsroom, union and Commission each possess information or influence that can assist, even though their responsibilities and legal powers differ.

Aslam focused on the Commission's dependence on police and on the financial insecurity that can make a reporter less able to refuse a risky assignment, pursue a complaint or pay for a prolonged legal defence. He urged the Commission to make the law visible in press clubs, hold discussions with journalists and publish reports that unions could use to identify unresolved problems. Maqsood added that PECA proceedings involving federal agencies may exceed the Sindh body's direct reach, which makes a clear referral route important as the federal mechanism develops. These concerns extend the meaning of safety beyond a first response to physical violence, while leaving wage adjudication and federal proceedings with the authorities competent to address them.

The group's proposals also create responsibilities for the institutions represented around the Commission table. APNS and CPNE can obtain responses from publishers and editors about insurance, training, at-risk assignments and the Commission's inquiries; the Geo and Samaa representatives can press their own newsrooms to show what support reporters receive; PFUJ can explain the complaint route, bring cases with journalists' consent and follow them; and HRCP can scrutinize confidentiality and independent case handling. None of these representatives alone can compel every media house to cooperate, but they can create momentum within their own constituencies and report what changes. That contribution matters especially in light of Chairperson Aijaz Memon's account that 44 media organizations did not answer the Commission's request for workforce, insurance and training information: the Commission should clarify and pursue its lawful request, while its nonofficial members help turn the call for employer responsibility into verifiable action.



Freedom Network representative in discussion with non official members of the commission.

The chairperson's account: cases, outcomes and resources

Chairperson Aijaz Ahmed Memon described a Commission that had taken up complaints across a range of serious threats and attacks. He said it had acted on its own initiative in nine matters and provided relief, referrals or protective measures in 28. The Commission's breakdown covered 52 matters, including murders, violent attacks, disappearances and threats, and Memon estimated that roughly 70 percent of its cases had reached resolution. His account shows an institution handling cases, although journalists would understand its contribution more clearly if it published what action it took and what happened to the people involved.



Memon acknowledged that waiting for police replies had previously slowed cases. He said the inspector general's office had since designated an assistant inspector general as a focal person who participates in Commission meetings and pursues responses from the relevant officers. Memon viewed this as an improvement over sending a letter through ordinary channels and waiting for a district reply. Union representatives and nonofficial members, however, described cases in which a late or dismissive police response left the journalist

without satisfactory help. The focal-person arrangement will answer their criticism if it helps the Commission secure timely protection, seek further information after a denial and keep a case under review while the risk continues.

The chairperson also disagreed with the view that journalists generally lacked confidence in the Commission. He pointed to its website and Facebook presence, said it had prepared printed information for distribution, and described the Commission as a developing institution whose procedures and relationships would strengthen over time. His account sits alongside the survey finding that many respondents did not know where to find a complaint route and the union participants' difficulty in identifying the chairperson. The next step is to put the prepared information into regional press clubs and newsrooms, check that the online complaint route works for a journalist seeking protection, and meet journalists beyond Karachi.

Memon placed particular emphasis on the role of journalists and their representative organizations. In his view, the Commission cannot build confidence through official correspondence alone if unions, press clubs, publishers and editors do not bring forward cases, share information and support the journalists involved. He said the Commission wrote to 44 media organizations seeking information about their journalists, insurance arrangements and safety training, but received no response; he also said the Karachi Press Club declined to share membership data. The scope of those requests and any reasons for declining them need examination. Even so, his account raises a practical problem: unions criticize the Commission's limited reach, nonofficial members criticize employers, and the chairperson points to organizations that do not cooperate. Each has identified work for another institution, while journalists still need a clear route to assistance.

The Commission under Aijaz Memon also proposed several amendments to strengthen the Commission's composition, continuity and enforcement powers. He recommended amending section 8(2)(iii) to include a nominee of the Association of Electronic Media Editors and News Directors (AEMEND), as well as two female journalists with at least five years of professional experience and an active role in media issues. He further proposed amending section 8(3) to give nominated members a fixed three-year term instead of appointing them annually. To address the non-compliance of public officials with the Commission's orders, he proposed empowering the Commission under section 14(1) to recommend disciplinary action under the Sindh Civil Servants (Efficiency and Discipline) Rules, 1973, and to impose a fine of up to 10 percent of the basic salary of a non-compliant officer or official.

These proposed punitive powers would strengthen the Commission by giving its orders practical consequences. At present, the Commission's effectiveness depends largely on the willingness of public authorities to cooperate and implement its directions. Allowing it to recommend disciplinary proceedings and impose a fine of up to 10 percent of a non-compliant official's basic salary would create personal and institutional accountability, discourage delay or disregard of its orders, and encourage timely action on journalists' complaints. The amendment would therefore help transform the Commission from a primarily recommendatory body into a more credible and effective protection mechanism. The proposed

amendments have been placed before the Chief Minister of Sindh and the provincial Cabinet for consideration and approval. Their adoption would require government action and the completion of the applicable legislative process before the Commission could exercise these additional powers.

Proposed amendments:

- *Insertion of clause (i) in section 8 (2) (iii):*

- (i) Nominee of Association of Electronic Media News Editors and Directors (AEMEND)

- *Insertion of clause (j) in section 8 (2) (iii):*

- (j) Two female journalists nominated by the Commission having professional experience of at least 5 years and a proactive role on media issues

- **Amendment in section 8 (3):**

- 8 (3) Change in the wording: from annual basis to *"for a period of 3 years"*

- **Insertion of new clauses about penalizing the non-compliant officer/ official at section 14 (1) (h):**

14 (1) (h) The Commission can recommend punitive action against non-compliance of orders of the Commission in accordance with Sindh Civil Servants (Efficiency and Discipline) Rules 1973 to the concerned authority.

14 (1) (i) The Commission can impose fine on non-compliant officer/ official up to 10 percent of their basic salary.

Saeed Memon
Secretary

Memon regarded the Commission as still developing. He described prepared annual reports, recurring meetings and an annual provincial grant of Rs. 50 million, while also acknowledging that substantial funds had lapsed. Those resources give the Commission a foundation for regional outreach, prompt responses and sustained case follow-up. His call for greater solidarity would become more concrete through an agreed division of work: the Commission would lead complaint intake, protection and follow-up, while its union, publisher and editor members would use their own networks to explain the mechanism, secure responses from media houses and bring journalists' experiences back into its decisions.

The Commission's office and public complaint route

The Commission occupies five rooms in the Sindh Archives building: offices for the chairperson and secretary, a meeting room, space for clerical staff, and an information-technology room. Its secretary serves on deputation from the Information Department, while other staff members work on contract. These premises provide an institutional base that the Commission lacked during its earliest period, but the value of an office depends on whether journalists can find it, make confidential contact and receive assistance before a threat escalates. At the time of the assessment, the Commission's website offered limited information, and its complaint button led to the general Chief Minister's complaint portal rather than a dedicated journalist form. This routing calls for a practical check of who receives a submission, what information the general portal discloses, whether a journalist receives confirmation, and how quickly the matter reaches someone authorized to assess risk.



The Sindh Archives building, which houses the Sindh Commission for the Protection of Journalists and Other Media Practitioners. Photo by Freedom Network

The Information Department and DG Information

The separate interview with Director General Information Dr. Moezuddin Pirzada concerned the government's role in establishing and supporting the Commission. He regarded Sindh's enactment of the first provincial journalist protection law as an important achievement and said the institution could gain effectiveness by learning from the information commission's stronger enforcement model. He considered journalist confidence stronger than some consultation participants did, while also urging journalist organizations to help make a commission created for their protection effective. The disagreement is not resolved by either institutional assurances or a small survey alone; direct feedback from users and journalists who considered but abandoned a complaint could identify the problem more precisely.

Pirzada said the Information Department allocates PKR 5 crore annually as a grant and had awaited a proposed Commission budget divided into spending heads. He associated the establishment of dedicated premises with a priority of the provincial information minister. The fieldwork also identified significant funds that lapsed over three years, without the financial records needed to determine the amounts or causes. If the grant remains unspent because the Commission lacks an approved spending plan, the two offices should resolve that plan and publish it; if release, recruitment, or procurement restrictions explain the lapse, the corresponding records should identify the decision maker and next step. Dedicated premises and a recurring grant represent institutional progress, but the ability to fund regional outreach, staff an emergency contact, and follow difficult cases supplies the meaningful test of that support.

The budget discussion should connect to the activities participants said were missing. Travel to interior districts, information in press clubs, staff who answer urgent calls, secure handling of complaints, and sustained case follow-up all require decisions about people and spending, even if some outreach can draw on volunteers and partner organizations. The Director General's account suggests that the province made a recurring grant available, while the reported lapses raise a distinct question about the Commission's ability to plan and spend that grant within applicable government procedures. Neither fact establishes that more funding alone would correct a slow police response, and neither establishes that the Commission can perform its mandate adequately with its present staffing. A published budget showing approved posts, planned outreach, releases, actual spending, and reasons for underspending would allow the two offices to move from competing explanations toward a programme that journalists can see.

The Sindh Information Department supplies administrative support and serves within the statutory structure through ex-officio representation. That role gives it the ability to secure premises, staff coordination, records, budget processing, public communication and links with media houses. It also creates a perceived conflict if the Department controls the very files, staff and public messaging through which the Commission must independently scrutinize government conduct.

The evidence, therefore, does not support removing the Department from all administrative

involvement. It supports a clearer boundary. The Information Department should facilitate resources, notifications and interdepartmental coordination. The Commission should control complaint intake, case files, risk decisions, findings, recommendations, publication and closure. Staff assigned to Commission work should answer operationally to the chairperson and Commission, even if the Department processes their service administration. This separation would address the repeated stakeholder description of the Commission as an extension of the Department without sacrificing the practical support the Department can provide.

Sindh assessment

Sindh has achieved formal compliance and a substantial degree of operational activity. It has a notified Commission, leadership, members, meetings, complaints, correspondence and a record of engagement with police and media organizations. It has not yet demonstrated consistent effective compliance. Journalists still struggle to locate the mechanism, few use it, most trust other institutions, and participants cannot point to a transparent sequence that converts referral into protection or accountability. Sindh's next phase should, therefore, focus less on proving that the Commission is active and more on showing what its activity achieves.

Media houses: duties and unmet protection

The two laws do not place responsibility solely on the government and the Commissions. They also make media employers part of the protection system. Subject to verification of the precise provisions in each statute, the employer duties include media houses to provide adequate insurance and safety training to journalists and other media practitioners who may face attack, injury or death because of their work. In practical terms, compliance also requires an employer to identify who faces risk, prepare staff before dangerous assignments, maintain an emergency response route, support an affected journalist, preserve and disclose relevant assignment information after an attack, and respond promptly and substantively when a Commission seeks information. The protection should extend to the people who actually perform risky work, including district correspondents, freelancers, stringers, camera persons and support staff, rather than stop at permanent newsroom employees.

The Sindh baseline found that 51 percent of respondents said their employer had not informed them about safety procedures, emergency contacts, insurance, legal assistance or complaint mechanisms. It did not establish the number of insured workers, the proportion who received training or any national employer-compliance rate. The chairperson's account that 44 outlets did not answer the Commission's request supplies a separate concern about cooperation, but an unanswered request alone cannot establish that every recipient lacked insurance or training. Together, the two findings justify a documented inquiry into both the protection employers provide and whether journalists know how to use it.



No. SCPJMP/Media/July/2025/J-1/4

**SINDH COMMISSION FOR
THE PROTECTION OF JOURNALISTS
& OTHER MEDIA PRACTITIONERS (SCPJMP)**

Karachi, dated: 28-7-25

To,
The Chief Executive Officer (CEO),
GEO NEWS

Subject: SHARING DATA, SAFETY TRAINING AND LIFE INSURANCE OF THE JOURNALISTS WORKING IN YOUR ORGANISATION.

In compliance with the directives issued by Honourable Senior Minister for Information Mr. Sharjeel Inam Memon during his meeting with the Sindh Commission for the Protection of Journalists and other Media Practitioners (SCPJMP) on 15th July 2025, I am directed to request you to provide complete data of journalists and other media practitioners employed in your organization so that better policies on the protection of journalists could be formulated.

This office has already requested you vide letter No.SCPJMP/Trainings/July/08 dated 09-07-2025 to fulfil the legal obligation of providing safety trainings and life insurance to the journalists for which the response is still awaited.

You are therefore requested to not only provide data as requested above, but also arrange safety trainings and provide life insurance to the journalists employed under your esteemed organisation.

Early action will be highly appreciated.

(SAEED MEMON)
Secretary

Copy forwarded for information to:

1. PS to Honourable Senior Minister for Information, Government of Sindh
2. PS to Chairman, SCPJMP
3. PS to Secretary Information, Government of Sindh
4. Master file.

Sindh Commission for the Protection of Journalists and other Media Practitioners (SCPJMP), office at Sindh Archives, St. 26/A, Clifton block-05, Karachi – 021-99251945, secretary.scpjmp@sindh.gov.pk

**SINDH COMMISSION FOR PROTECTION OF JOURNALISTS &
MEDIA PRACTITIONERS
LIST OF CHANNELS AND NEWSPAPERS**

Sr. No	Name of Channel/ Newspaper	Delivered by	Date & NAME
✓ 1.	Khabrain	for Bx post	9/7/25
✓ 2.	Bol News	for Bx post	9/7/25
✓ 3.	ARY	for Bx post Aslam	9/7/25 Aslam
✓ 4.	KTN	FAHAD	9/7/25 FAHAD
✓ 5.	Dawn News Aurara	for 9/7/25	Aslam
✓ 6.	T V One	for by post	9/7/25
✓ 7.	Dunya News Network	for by post	9/7/25
✓ 8.	The Express Tribune	for by post	9/7/25
✓ 9.	GEO News	Ajmal	9/7/25
✓ 10.	METRO News	for Bx post	9/7/25
✓ 11.	GNN News TV	for by post	9/7/25
✓ 12.	92 News	for by post	9/7/25
✓ 13.	CAPITAL TV	Amir	Amir 9/7/25
✓ 14.	Express News	for by post	9/7/25

✓ 15.	Jassart	Dr by post	10/7/15
✓ 16.	SAMMA TV	Dr by post	Manj 9/7/15
✓ 17.	The Dawn	Dr by post	Shameen
✓ 18.	Channel-5	Dr by post	9/7/15
✓ 19.	UMMAT	Dr by post	Ghulam 9/7/15
✓ 20.	Daily Ibrat	Dr by post	9/7/15
✓ 21.	Daily Awami Awaz	Shahjahan	Dr 9/7/15
✓ 22.	Kawish Daily	Dr by post	9/7/15
✓ 23.	Jang News	Aijal	Dr 9/7/15
✓ 24.	DIN News	Dr by post	9/7/15
✓ 25.	K-21 News	Dr by post	9/7/15
✓ 26.	AAJ News	Dr by post	9/7/15
✓ 27.	Business Recorder	Dr by post	9/7/15

28	Sindh Express	by post	28/7/28
29	Sindh sujaag	by post	28/7/28
30	Daily Regional times of sindh	by post	28/7/28
31	The News	by hand	28/7/28
32	Abb tak News	by post	28/7/28
33	Sindh Tv News	by post	28/7/28
34	Awaz Tv	by hand	28/7/28
35	Mehran Tv	by post	28/7/28
36	Dharti Tv	by post	28/7/28
37	The Time News	by hand	28/7/28
38	Vsh Tv	by hand	28/7/28
39	Daily pahenji Akhbar	by hand	28/7/28
40	Daily Halchal	by hand	28/7/28
41	Tameer -e- Sindh daily	by post	28/7/28
42	Daily jeejal	by post	28/7/28
43	Khabroon	by post	28/7/28
44	Khyber TV	x	

Employers are not sharing essential safety information



51%

of respondents said their employer had not informed them about safety procedures, emergency contacts, insurance, legal assistance or complaint mechanisms.

THE BASELINE DID NOT ESTABLISH:



The number of insured workers



The proportion who received training



Any national employer-compliance rate



This gap highlights the need for stronger employer accountability and clear, enforceable safety standards for journalists across Pakistan.

The stakeholder evidence explains the consequences. Participants said employers should not send journalists into risky assignments without training or insurance, should investigate the work-related context when a journalist is attacked or killed, and should answer Commission correspondence instead of leaving police to characterize motive without the journalist's editorial record. One participant framed the accountability question directly: "Why did you send an untrained, without-insurance journalist?" describing the question media houses should be required to answer. Another participant could not identify a single case in which a media outlet had investigated a journalist's murder: "Has any media outlet investigated the murder of a journalist? Not a single incident. Can't tell a single incident."

Recommendations

- 1. Give the federal Commission the people, premises and budget to receive cases.** The federal Ministry of Information and Broadcasting should agree an operational plan with Chairperson Kamal Uddin Tipu, fill the outstanding membership seats, provide an accessible office and approve a dedicated budget and small permanent secretariat. The initial team should include named personnel for complaint intake, urgent risk assessment, case follow-up and records. Before advertising a complaint portal as operational, the Commission should test who receives a submission, who acts when it describes an immediate threat and how the journalist obtains an update.
- 2. Establish a safe route into the Sindh Commission, including outside Karachi.** The Commission should publish one clearly identified telephone and online complaint route, correct the website link that led to the general Chief Minister's portal, and explain how a journalist can seek urgent help without first approaching a local information officer. It should place the same information in press clubs, union offices and newsrooms across Sindh, then test those routes with journalists in interior districts. Journalists should be able to approach it directly or through a trusted person without having to join a union.
- 3. Adopt a case procedure that continues after the first letter.** The Sindh Commission should specify who receives a complaint, when that person assesses immediate risk, who can contact a senior police officer without waiting for a routine meeting, and when the complainant receives an update. A caseworker should record the authority's response and refer an incomplete denial or unanswered request for a further decision. The procedure should cover confidentiality, urgent protection, follow-up and a reasoned closure communicated to the journalist.
- 4. Agree a response and escalation arrangement with police and relevant departments.** The Commission and the inspector general's office should define the assistant inspector general focal person's responsibilities, including how the office handles urgent requests and district replies that fail to address a journalist's risk. The Commission should record the officer responsible for each case and escalate silence or an inadequate response. Anonymized examples should show whether this arrangement produces action beyond correspondence.
- 5. Turn the 44 unanswered media-house inquiries into an employer compliance exercise.** The Commission should review the wording and legal basis of its requests, then seek the information it lawfully needs about insurance, safety training, emergency contacts and support after an attack. APNS and CPNE representatives should convene publishers and editors to obtain answers and address objections; senior newsroom representatives

should begin with their own outlets. The Commission should report how many organizations responded and which workers their protections cover, including district correspondents, freelancers and camera crews.

6. **Give nonofficial members defined work between meetings.** The Commission should agree on responsibilities with its PFUJ, APNS, CPNE and HRCP members. Unions can explain the complaint process and follow cases with a journalist's consent; publisher and editor bodies can seek employer cooperation; and rights representatives can scrutinize confidentiality and independent case handling. At each meeting, member organizations should report the contacts made, barriers identified and commitments secured. This would give practical form to Memon's call for solidarity.
7. **Publish outcomes and spending in a form journalists can use.** The Sindh Commission should release its prepared annual reports and publish anonymized information about complaints, first responses, protective actions, referrals, follow-up and closure. It should explain in ordinary language what it means when it calls a case resolved. The Commission and Information Department should also publish the annual grant, spending plan, actual expenditure and reasons for funds that lapse.
8. **Target amendments at documented barriers.** Before advancing changes to the Sindh law, the Commission should publish the proposed text and identify the problem each clause addresses. Any financial consequence for noncompliance should specify the duty involved, decision maker, notice, opportunity to respond and means of challenge. Proposals on women's representation and members' tenure should explain how they improve access and continuity. Cases involving federal agencies may call for a referral arrangement rather than broader provincial powers.

Chapter 7

Conclusion

Pakistan's 2021 laws changed the legal position in an important way. They recognized that violence and coercion directed at journalists because of their work threaten not only the individual but also the public's right to receive information. That recognition aligns domestic reform with the UN Plan of Action and SDG 16.10. It deserves to be preserved and completed.

The federal government must now create an institution around the Commission it notified. A chairperson, a draft website and approved posts cannot substitute for members who can meet, staff who can act, a budget that can be spent and an office the public can find. Tipu's account shows the cost of delay: a public complaint channel has little value until an authorized team can receive and act on an urgent report.

Sindh must take a different next step. It has an institution and a record of activity. It now needs a process that is visible, independent and consequential. The testimony of Tahir Hassan Khan, Mazhar Abbas and other stakeholders shows that the central frustration concerns what happens after a complaint. If the Commission sends a letter and then accepts delay or a routine denial, it adds little to the ordinary system. If it assesses risk, tests the response, escalates default, informs the journalist and publishes outcomes, it can perform the specialized role the law intended.

The decisive measure should remain practical: what changed because the Commission became involved? If the journalist became safer, an investigation improved, an employer fulfilled a duty or an authority answered for delay, the law has begun to work. If the process ended with notification, a meeting or an unanswered letter, legal protection remains incomplete.

"When it was being made, there was a lot of hope. Our hope was that there would be a forum in which everyone would have confidence." The evidence does not support abandoning the statutory model. It supports completing it. Participants still want a forum that journalists can trust, but trust will follow visible protection, independent findings, timely escalation and published outcomes, not legal existence alone.

ABOUT FREEDOM NETWORK

Freedom Network is Islamabad-based independent media watchdog and development sector research, advocacy and training organization. It was established in 2013.

In 2017, Freedom Network was awarded the prestigious French Republic's "Human Rights Prize" for "its efforts for safety and protection of journalists and promotion of freedom of expression."

OUR MISSION:

To protect civil liberties, including freedom of expression and access to information, and promote an informed society that sees media as a key partner in a democratic and pluralist Pakistan.

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