

The Trend of Claiming Right of Inheritance among Women in Lahore

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Abstract

Women's rights are essential to all major religions as well as to international and state legal systems. Due to the recent increase in awareness, women are now highly concerned about their rights and status in society. In the pretext of women's empowerment, the dispensation of the right of inheritance always remains significant. In Pakistan, women are not denied their rights, but there is a certain predicament that detains them to claim. The constitution of Pakistan and Islamic sharia laws, though, guarantee women's rights without any discrimination but few determinants are depriving them of such privilege. Although the denial of this right cuts across the whole country, this paper explores the choices and challenges of women in Lahore. The inferences of this study will help to ascertain the possible reasons among women for surrendering this right.

Keywords: Property, customary practices, legal developments, social boycott

Introduction

Inheritance, as a share of movable and immovable assets, conferred by parents must be secured on a legal basis. 'Rights to land and property include the right to own, use, access, control, transfer, exclude, inherit and otherwise make decisions about related resources.¹ It is a right that must be secured by the state for everyone.

Punjab, as the federating unit of the Islamic Republic of Pakistan, preferably deals with all the issues in the light of the Quran and Sunnah. The Constitution of Pakistan and Sharia laws are quite clear in the context of women's rights, granting them all

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¹ Beenish Ijaz Butt and Amir Zada Asad, 'Refutation, Relinquishment and Inheritance: Exploring Women's Inheritance Rights in Pakistan,' *Journal of Social Sciences (PJSS)* 36:02 (2016), 1001-9.

the rights including security and respect in society. Islam safeguards the right of inheritance for all without any discrimination. 'Driven by Islamic ordains, the protection of women's rights is enshrined in the constitution of Pakistan. Constitution of Pakistan provides safeguard to the women's right of protection'.² Article 23 of the Constitution guarantees the right to own property for every man and woman in the country. 'Pakistan had also ratified the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) in 2008 with a declaration making compliance subject to its Constitution and entering a reservation under article 29'.³

Contrary to these regulations, women are confronted grave discrimination in Pakistan. 'World Economic Forum (WEF), Global Gender Gap Report 2021, placed Pakistan 153rd among 156th countries in the gender parity index. In South Asia, Pakistan positioned 7th, upgraded to war-torn Afghanistan only. In Pakistan, the Gender gap had widened by 0.7 percent in 2021'.⁴ Unfortunately, this predicament remained almost the same in the last 16 years, 'gender equality was 0.553 in 2006 which improved just by 0.556 in 2021. 'Pakistan's International Property Rights Index (IPRI) score decreased by 0.069 to 4.211 placing it 18th in the Asia and Oceania region and 111th in the world'.⁵

In Punjab, Lahore is the second largest city in Pakistan stretching over 811 miles (1,305 km). It's leading in terms of commerce, banking, and industrial activities. It's axiomatic that Punjab attains the highest literacy ratio among all the other provinces. The male ratio is 72% whereas women's literacy rate is

² Asgher Ali, *Islam, Women and Gender* (New Delhi: Gyan Publication House, 2001), 60.

³ A reservation is a statement by a State at the time of becoming a party to a treaty which excludes or modifies the legal effect of certain provisions in their application to that State. 'The United Nations Entity for Gender Equality and the Empowerment of Women, Conventions on the Elimination of All Forms of Discrimination against Women', 1 January 2008, <https://www.un.org/womenwatch/daw/cedaw/recommendations/recomm.htm>.

⁴ 'Global Gender Gap Report 2021' (World Economic Forum, 30 March 2021), <https://www.weforum.org/reports/global-gender-gap-report-2021/>.

⁵ Nasir Iqbal, 'The Gender Gap', *The News*, 12 April 2021.

54%, which means 22 % less than men. Taking these facts into account, it is expected that women bear less discrimination and prejudice in terms of their socioeconomic, political and legal rights. But many studies identify a few barriers which prevent exercising them. 'In Pakistan, women are the victims of certain practices which are very contentious in nature'.⁶ The girl child was raised in a way that they realized certain sacrifices are necessary. Women are required to follow the designated social codes. 'Acceptability and assurance of their rights of inheritance is a form of social protection, but its denial is making them more vulnerable to domestic and societal violence'.⁷

Women voluntarily or involuntarily gave up their rights to land and property to comply with several outdated traditions. They must not bring up a concern about their rights because doing so will make them a dissenter. 'Nevertheless, human rights activists stress the pervasive gender disparities in Pakistan. It was also proved by several reports that women are likely to surrender their property in favour of their male members of the family'.⁸ The barriers to inheritance are primarily Pakistan's deeply ingrained patriarchal structure, misinterpretations of Islamic law, gaps in its legal and judicial framework, and the blending of culture and religion.

Customary practices, religion and legal perspectives

The key to achieving the principles of advancement in any community is the preservation of women's right to inheritance. Throughout Pakistan, hundreds of examples of women being denied inheritance and unfair inheritance division go unreported. Many factors prevent women from asserting their rights to land

⁶ Aftab Hussain, *Status of Women in Islam* (Lahore: Pakistan Educational Press, 1987), 110

⁷ 'Denial of Women's Right of Inheritance, Enhancing Their Vulnerability Domestic and Social Violence,' January 2010, <file:///C:/Users/Test-PC/Documents/documents/inheritance/AWAZ%20Inheritance%20Rights.pdf>.

⁸ Livia Holden and Azam Chaudhary, 'Daughters Inheritance, Legal Pluralism, and Governance in Pakistan,' *The Journal of Legal Pluralism and Unofficial Law* 45:1 (8 May 2013), <https://doi.org/10.1080/07329113.2013.781447>.

and property. 'Harassment, fraud, force, physical torture, mental torture, threats and emotional tools like the reference of family affiliations are mainly used to compel women for withdrawing their concerned rights'.⁹

Cognizance of the denial of this right across the country compelled the government of Pakistan to legislate to curtail the violation of women's right to inheritance. 'The Women's Property Rights Bill 2019 and 2021 had been implemented to guarantee women's rights of inheritance'.¹⁰ 'It is mentioned in the concerned bill that the rights of ownership of women in inheritance are violated usually by their family members employing coercion, fraud, fabrication, forgery and cheating, etc'.¹¹ The Women's Property Rights (Amendment) Bill, 2021 also avows very clearly that illegal occupation over the women's share of the movable or immovable family property would be regarded as a criminal offense. 'Infringement of this law would have been a punishable crime of up to 10 years or no less than five, and/or a fine of Rs1 million'.¹²

The government's efforts to protect women's right to inherit are demonstrated by the passage of the Women's Property Rights (Amendment) Bill, 2021. However, the fight in the Senate to defeat this law was fueled by a misogynistic attitude against women's rights to property and land. Backed up by many legal advancements in pre and post-independence scenarios, the claim of women's right to property and land was made possible. Initiation of 'The Married Women's Property Act of 1874 and the Dissolution of Muslim Marriages Act of 1939 led to the enforcement of the Muslim Family Laws Ordinance, 1961, the West Pakistan Muslim Personal Law Shariat Application Act,

⁹ Haseeb Bhatii, 'Woman's Inheritance Could Only Be Claimed in Her Lifetime,' *The Dawn*, 23 September 2021.

¹⁰ 'THE PUNJAB ENFORCEMENT of WOMEN'S PROPERTY RIGHTS ACT 2021 (Act X of 2021)' (2021), <http://punjablaws.gov.pk/laws/2789.html>.

¹¹ Ibid.

¹² Umar Bacha, 'Laws Ensures Women's Right of Inheritance, Why Women Still Suffer?' *The Dawn*, 3 May 2022.

1962, and the Prevention of Anti-Women Practices Act, 2011 to secure women's rights in Pakistan'.¹³

In Punjab, the sanction of S.135-A, the 142-A Land Revenue Act makes the accurate distribution of property obligatory. 'The revenue officer will be responsible for finding a solution to the dispute if the legal heirs do not do so within 30 days, otherwise, the revenue department will be disciplined for negligence'.¹⁴ The aforementioned issues render realization to expedite the mechanism of redressal in such matters.

Over time, entrenched patriarchy has come to represent an oppressive mindset in society that prevents women from speaking out against discriminatory practices. It is stigmatized and implied that women who fight for their rights are unworthy. 'Western feminist researchers believe that once a society is dominated in certain spheres by men, women will become suppressed and passive group'.¹⁵

Many individuals see the dowry as compensation for female portion of family wealth. Even though the controversial tradition of dowry has been outlawed in Pakistan, it is nevertheless employed as a means of denying women's inheritance rights. To prevent the transfer of property outside the family, some families prefer cousin marriages. Many feudal households compel their women to wed with the Quran to guarantee their ownership over the property. In that situation, she lived her entire life within the confines of her home but barely mustered the courage to assert her legal rights. Such discriminatory actions make it difficult for developing nations like Pakistan to progress equitably. 'In many other cases, women do not demand their share of the property to remain associated with the family'.¹⁶ As the demand for their share in inheritance may cause repudiation, coercion, physical torture, etc. Sanahil Cheema, an Islamabad-based lawyer said that 'many families who forced their daughters to withdraw their share of the

¹³ Ibid.

¹⁴ Haseeb Bhatii, *op.cit.*

¹⁵ Soraya Duval, *New Veils and New Voices: Islamist Women's Groups in Egypt* (New York: Oxford University Press, 1998), 72.

¹⁶ Rubya Mehdi, *Gender and Property Law in Pakistan: Resources and Discourses* (Lahore: Vanguard Publication House, 2002), 136.

property compelled their daughters-in-law to attain their share of ancestral property'.¹⁷

Weighing up the legal developments, it is admissible for all women, whether married or unmarried to sell and buy their property provided that they obtained the legal documents of their share of the inheritance. If she is successful in attaining her due share, it is usually handled by male members of the family. The difference between 'have a property and hold property'¹⁸ needed to be understood. On the contrary, male members of the family compensate for it by presenting gifts on various occasions like Eid, Shab-e-Barat, child's birth, etc. to their married sister. If she goes against this system, she will face dire consequences in the form of social boycotts or physical and mental torture. In certain conditions, she has to file a complaint and consult the judiciary to prove her claim. But the time-consuming, expensive and complicated judicial procedures detain her to pursue such cases.

Though Islam described the rule of the division of ancestral property, systematic discrepancies in many Muslim countries discourage women from raising their voices to claim it. In various chapters, the Quran sheds light on the issues of inheritance. It is clearly stated in the Quran, 'Unto the men (of a family) belongeth a share of that which parents and near kindred leave, and unto the women a share of that which parents and near kindred leave, whether it be little or much - a legal share'.¹⁹ These verses challenge the ancient traditions of our society which encouraged the treatment of women as property.

The table below shows the share of women outlining according to the law of inheritance. Though it is indispensable to divide the assets of inheritance by following Islamic laws, its distribution varies based on the number of beneficiaries, their relationship and distinct circumstances. But the main formula as a yardstick must be followed. According to the Sharia laws, the table outlines the manner of division of the total property of the deceased; after settling his liabilities such as loans, mortgages and other balances.

¹⁷ Intsab Sahi, 'Denied Inheritance,' *TNS*, November 14, 2021.

¹⁸ *Ibid.*

¹⁹ Quran, al-Nisā' 04:7.

Table 1

Individual Woman	Inheritance Right
Daughter	$\frac{1}{2}$ of the brother's share (in case she has brothers) $\frac{2}{3}$ rd of X is equally divided among all sisters (in case she has one or more than one sister) $\frac{1}{2}$ of X (if she is the only child of her parents)
Mother	$\frac{1}{6}$ th of X (if the deceased had children) $\frac{1}{3}$ rd of X (if the deceased had no children and parents are the only heirs) $\frac{1}{6}$ th of X (if the deceased had brothers)
Wife	$\frac{1}{8}$ th of X (if she has children) $\frac{1}{4}$ th of X (if she doesn't have any children)

Source:https://www.cerp.org.pk/updata/files/files/46_20200521210833.pdf

Methodology

The study employed semi-structured questionnaires, group discussions, and interviews as the main research tools. The survey covered the viewpoint of 100 women between the age of 25 to 60 cut across almost all the social classes in Lahore. The semi-structured questionnaire helped to ascertain the viewpoint of working as well as non-working women about the trend of claiming the right of inheritance. Besides the survey, two focused group discussions, one of working and the other non-working women, were conducted consisting of 20 participants each. The survey and group discussion were managed to be documented in June 2022. The language chosen for the survey and discussion was based on the convenience of the participants. The audio-taped discussion lasted almost 60 minutes with each group which was transcribed subsequently. Five lawyers had also been interviewed to get legal advice to resolve such an issue. The analysis of the survey, discussions and interviews helped to draw inferences and suggest some possible solutions to resolve this issue.

All the interviews were audio-recorded and transcribed subsequently.

Table 2: Respondents profile

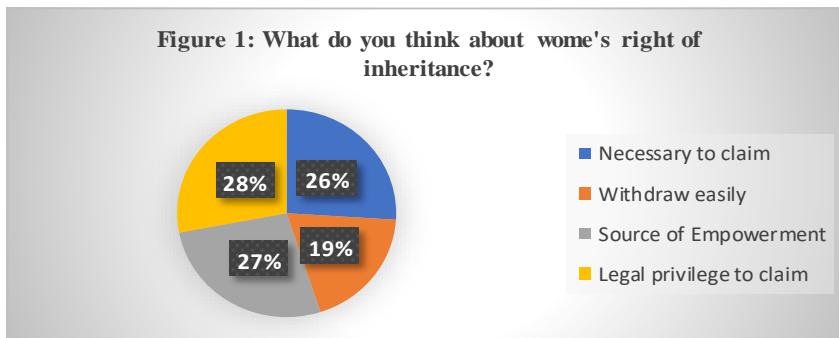
Age	25-30	35-40	40-50	50-60	
	30	35	20	15	
Qualification	Blow Matric	Intermediate to B. A	M.A to M. Phil	PhD	
	17	35	45	3	
Marital status	Married	Unmarried	Divorced	Widow	
	64	25	06	05	
Working	Yes	No			
	50	50			
Number of Siblings	1	2	3	4	More than 4
	05	12	26	13	44

After reviewing the dialogue of groups and the results of the survey, the following themes are evolved.

Significance of women's right of inheritance

The violation of women's right to inheritance is the most discussed and pervasive issue all over Pakistan. Several welfare organizations raise their voice for the protection of women's right to inheritance. After the promulgation of certain regulations, this problem persists even in the cities like Lahore. Although women are entitled to claim their right of inheritance equally but do, whether they exercise it, is an issue of consideration. The prevalence of violation of women's right to inheritance is, no doubt a contentious issue. Besides hundreds many women withdraw this right silently, therefore, a large number of them admit the significance of its claim.

When a similar question had been asked to the targeted population, the results illustrated that 81% of respondents realized the importance of such a right. They regarded it a legal privilege to claim, a source of empowerment and necessary to claim with a ratio of 28%, 27% and 26% respectively. Whereas 19% consider that it could be withdrawn.



Primarily, in group discussion, an open-ended question was initiated; 'What is the significance of the right of inheritance in a woman's life?'. It seemed that the majority of the respondents realized its importance, but they remained reluctant to openly admit it. Most respondents were of the view that 'it was our right but we couldn't claim it'. Many others reckoned that 'attaining the ownership of our inherited assets would be a huge financial support'. They further iterated that 'it would be a favor if the family assigned them their due share of movable and immovable property of inheritance'. They failed to comprehend that it was not a favor but their right. Five of them said that 'our respectful and life-long relationship between the siblings would be perverted if they demand their portion of the inheritance'. Other than these responses, three of the respondents, who regarded their brother's love as an 'a blessing', admitted that 'they could not go against them'. It meant 'they regarded the demand for property, as a source of conflict'. Few others described that 'Men remained always superior to women, liable to handle all their affairs, hence women should not even discuss this issue'. Arguments like this signified the deep-rooted patriarchy in our society. In almost all the discussions the word 'family affiliation', 'family's respect' and 'family's cohesion' were used time and again.

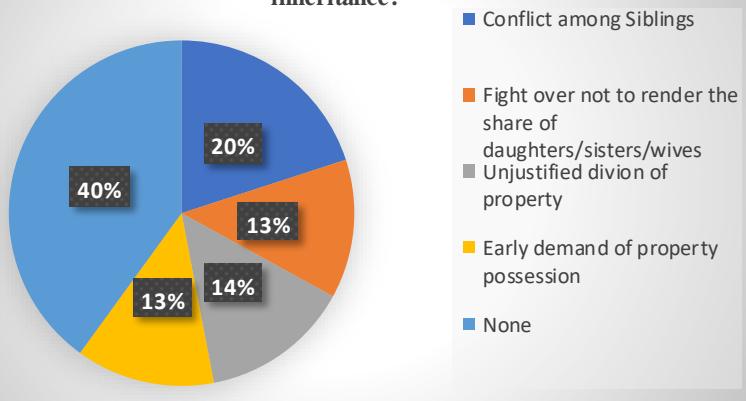
Acceptability of women's right to inheritance

Figure 2 points out that 40% of the respondents did not observe any issue over the claim of the right of inheritance in their families. But here was an interesting fact to note that those who had chosen the option of none, selected their relatives, in the next figure, who coerced them to leave their due share of the property. It is

understood that many women were reluctant to share their personal experiences. On the other hand, 20% observed conflict among siblings, followed by unjustified division of property with 14%, fights over not rendering the share of a female member of the family and early demand of property possession with 13%. Collectively, the ratio of those who reported the issue over the division of inherited assets was in the majority with 60%. It outlined that this was a contentious problem in the majority of families.

Most of the participants of the group discussion did not admit any problem over the matter of property initially. Most of the participants said that 'this issue had never been the point of discussion among their families, how such conflict could have been confronted?'. When they had been asked if it would be deliberated, what would be the result? In response, 'many of them

Figure 2: Do you observe any issue over the claim of right of inheritance?

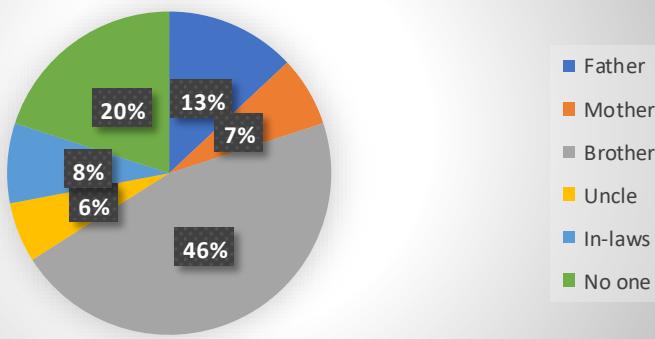


reluctantly acknowledged that they had to bear grave antagonism'.

In the following figure, 46% of women selected the brothers as a compelling force to prevent them from their claim of inheritance. Subsequently, other respondents signified fathers, In-laws, mothers and uncles who pressured them to leave their right of inheritance with the ratio of 13%, 8%, 7% and 6% respectively. Though 20% of women had selected the option of no, one the statistics to show the gravity of this matter are that a total of 80% of respondents indicated that their family members coerced them to usurp their share.

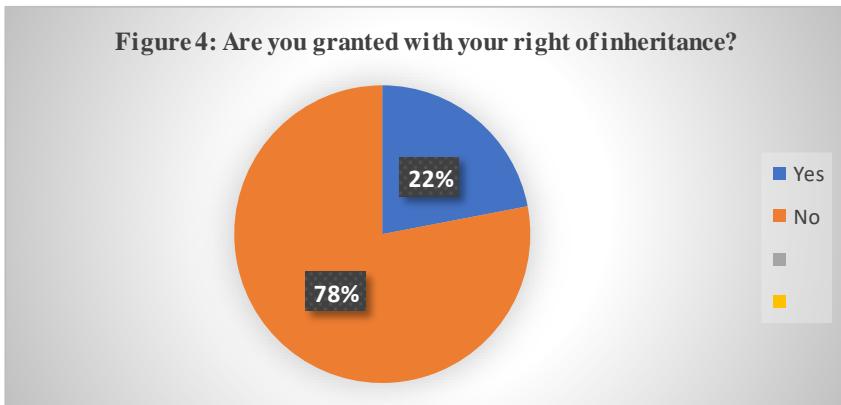
During the discussion session, a member of the working women, group expressed that 'her mother detained her to claim the property. She had been told that she would be secluded throughout her life if she demanded the family property. Three of the participants of working women had been completely unaware that the property had already been transferred to their brothers. A few others from the non-working group said that 'their brothers called them and ordered them to sign for securing the smooth transfer of property'. In reply to the question 'Why they didn't show any

Figure 3: Has anyone forced you to leave your right of inheritance?



revulsion'? Most of them remained silent whereas several others portrayed 'the fear of brother's annoyance'. They said, 'How one could imagine life without the family'. It meant that their demand for property would surely be considered as transgression. Among all the respondents, fifteen believed that 'property issues would bring dishonor to the family'. Many of them used the word '*log kya kahien gey*' (people will talk). To keep up the respect of the family, they must not report this matter.

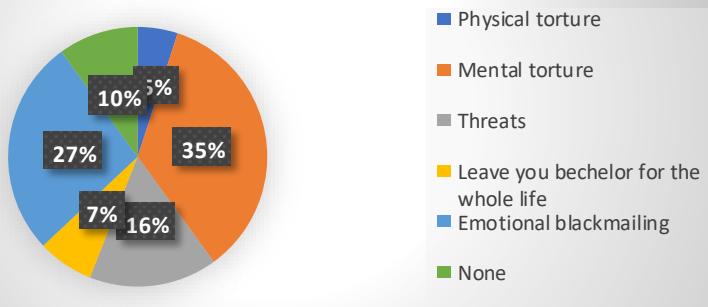
Figure 4 clearly illustrates the discrimination against women in terms of recognizing their right to inheritance. As 22% of respondents, all attained their right of inheritance while the rest faced denial.



In a group discussion, around twenty participants said that 'their family already denied the women's right of inheritance'. Three participants of the working women's group, astonishingly, shared that 'their father reserved a meager sum of money for them as a gift which had not been even the 3% of her property-share but the discussion over the justified division of property was not permissible'. A respondent expressed disappointment, while sharing her experience, that 'to fulfill my dream to study abroad, I demanded my share of family property but the distressing attitude of male family members prevented me of this claim'. Among all the forty participants, two participants had claimed inheritance against their family's will. Both of the claimants were successful in attaining their inheritance. However, this was not achieved through the legal system; instead, the women had to informally negotiate for their rights.

Altogether, 73% of the total surveyed had been expected to experience varied grave consequences in response to claiming the right of inheritance. 35% of women were likely to face mental torture, while those who could receive threats are 16%. In response to a similar question, 27% of women chose the option of emotional blackmailing while it reached 7% to the option of leaving respondents bachelor for their whole life. 5% of respondents were supposed to be subjected to physical torture and only 10% of women had chosen the option of none. It showed various endangered and diverse consequences that detained women from demanding their right to inheritance.

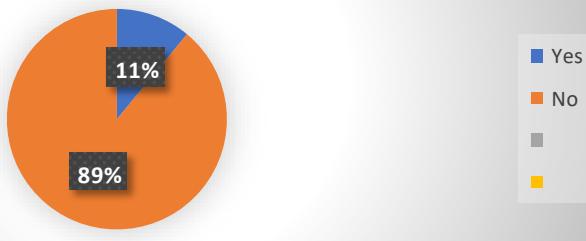
Figure 5: Which consequences you will face if you claim your right of inheritance?



While discussing, no matter whether working or non-working, the majority of participants of both groups believed that 'they would face dire consequences if they asked about the property of inheritance'.

Figure 6, indicate 89% of the respondents admitted that they had not been handed over any legal documents. Among 22% of women who had attained their right of inheritance (figure 4), 11% failed to prove it because of the absence of legal documents.

Figure 06: If you have been given your due share of property, do you attain its documents as well?

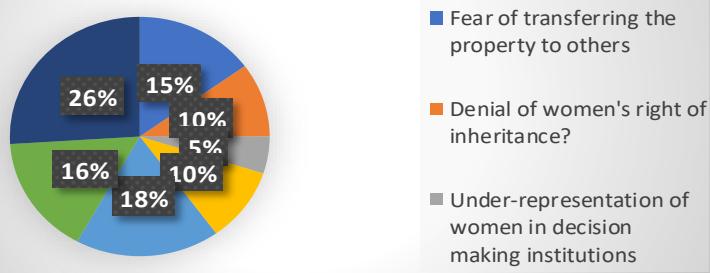


While sharing her experience in the discussion, a working woman acknowledged that 'her brother always supported through thick and thin, how she could demand her property'. Most of them admitted that '*hum kaise keh saktey hy k hume saboot chahiye*'. It means that 'we were not supposed to demand legal documents; they would give its possession when possible'. Among all only one woman admitted that 'she had the possession of documents'. In

discussion, three of the working women said that 'they had been told to be granted their due share of the inherited property but the transfer documents had not been handed over to them'. In the group of non-working women, few respondents said that 'it portrayed as a sin to demand the inherited property'. She further explained that 'women could never demand their share'. When the reason had been asked, she replied that 'it disrupted the web of the family'. Among the whole forty participants of the discussion, thirty-eight had not been granted the right of inheritance.

Quite a varied reaction was observed in the response to the question 'Which factor detains the family not to grant women's right of inheritance'. The highest ratio of 26% of all was of the view that dowry was perceived as a replacement for inheritance while registration of property in the name of male family members was selected by 18%. Denial of women's right to inheritance and lack of education and awareness were opted with a similar ratio of 10%, while the under-representation of women in decision-making institutes remained the least in terms of its selection with 5%. 16% of respondents believed that it was the weakness of the legal system, followed by the denial of women's right to inheritance with 15 %. It's a general perception that dowry is considered to be the replacement of inherited property in our society and a large number of families have already entitled their male members to the family's estate.

Figure 07: What do you think? which factor detains the family not to grant women's right of inheritance?

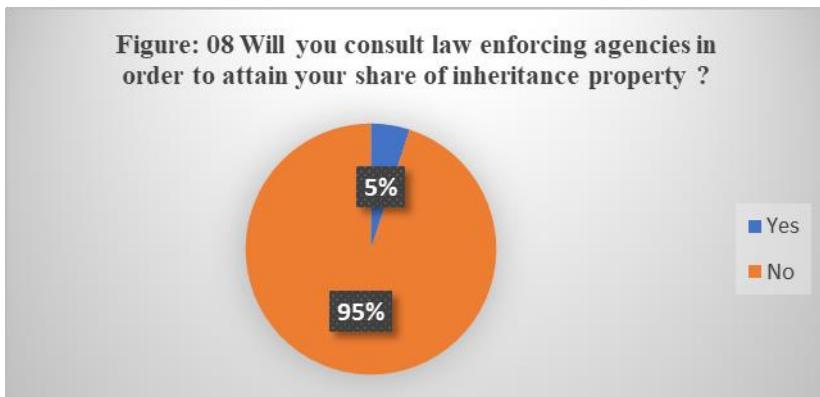


Ten respondents of the non-working group revealed the fact that, after the death of their father, they came to realize that 'the entire property had already been transferred to their brothers'. Five others

transpired that 'their family denied their right of inheritance'. The majority of respondents believed that 'dowry could not be the substitute of their due share of property' whereas three others supported dowry in place of the share of inheritance'.

Dealing approaches

The figure below illustrates that 95% of the respondents had not agreed to consult governmental institutions. It exhibited their distrust over the governmental commitments to guarantee their rights.



All the respondent lawyers admitted that 'delays in judicial procedures discourage the woman from registering their complaints'.²⁰ To redress the grievances, the Punjab government

²⁰ Naseer Ahmed Kamboh is in Lahore Bar Association as advocate High Court. He earned L.L.M degree and had more than 10 years of working experience.

Rana Intezar Hussain is advocate High Court, presiding Best Law Company, associated with Lahore Bar Association. He had 15 years of experience dealing criminal cases.

Syed Shahbaz Bukhari is advocate High Court and vice president Lahore Bar Association, running Gilani Law Chamber office cant. Courts Lahore. Since 2005, he has been dealing criminal cases focusing violation of Basic Rights.

Anum Ali is associated with Asma Jahangi Foundation, having more than 5 years of experience, working on the cases of violence against women.

had established various institutions, but most of the participants of the discussion sounded dubious about their efficacy. A respondent of the working group said that 'she got the decision in her favor in no time but its implementation was evaded by applying various tactics.

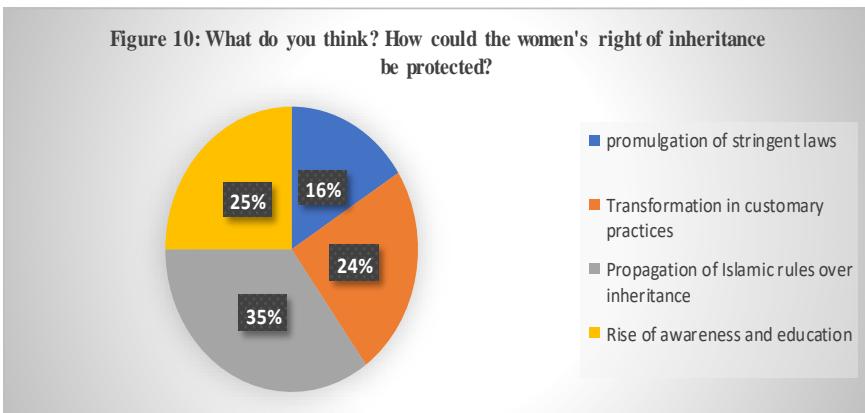
In Figure 09, 55% of respondents admitted that they already knew about the laws enforced by the Government of Pakistan to protect their right of inheritance. But they did not endeavor to consult the legal system.



Three respondent lawyers mentioned that the common man didn't know about the laws and those who knew barely comprehend its technicalities. Most of the women participants admitted that they had heard about the law but didn't get into details.

The answer to 'How could women's right of inheritance be protected', 35% of the respondents supported the idea of propagation of Islamic rules, whereas only 16% of them believed that promulgation of stringent laws could also be helpful to ensure women's rights of inheritance. Probably they already knew that merely enforcement of laws could not guarantee the security of such rights some other measures should also be taken in this regard. On the other hand, the rise of awareness and education and

the transformation of customary practices reached 25% and 24% respectively.



During the discussion, the respondent lawyers stressed the fact that merely the promulgation of stringent laws couldn't ensure the protection of women's right to inheritance. They denied any single solution formula and supported the idea of a framework of transformations in society. The multiplicity of responses from women participants also showed that all the above-mentioned parameters should be followed to resolve this issue.

Conclusion

It is crucial to raise awareness within society about women's entitlement to inherit. The gathered data distinctly revealed that whether women were employed or not, their attitudes in such matters were nearly identical. To deal with this issue, three actors should play their roles collectively: the education department through the curriculum, the electronic media via programs and the judiciary by ensuring speedy justice. Moreover, the government must ensure women's protection against any kind of violence. But it's the foremost obligation of women to stand up for their rights. Unless women claim, they cannot attain their due portion of the property. Weighing up the Islamic ordains and the Constitution of Pakistan, women's right to inheritance must be bequeathed by all family members.

It is deemed necessary that the government should initiate the exclusive policy on women's right to inheritance. Women

should be encouraged to take the initiative to demand this specific right. Most of the women participants of the discussion showed their willful surrender over the matter of inherited property, but as much as indulged in this discourse they realized that they had to claim it, as they expressed. They had not been given the right to raise their voice over this issue. It is presumed in our society that only male family members are entitled to attain the property of inheritance. They do not even observe the female share of inheritance as inalienable. Two of the participants admitted that 'they had been told that they could not receive the entirety of their due share but the lesser portion in place of none if they would be able to maintain their silence.

Gender issues should be sensitized in Pakistan by rendering training of men through their mothers and other females in the family. There is a need to get rid of centuries-old traditions and transform them. By breaking the chains of patriarchal structures, systematic discrimination against women must be eliminated. A pragmatic approach should be adopted to bring practical change in legal reforms. It should be realized that women can better handle their property matters and inheritance. Women must comprehend that they have to extend support to their daughters for claiming their inherited property. 'Legal frameworks are the institutionalizing mechanisms which can convert claims into rights and make actions obligatory for survival, protection and development of its citizens'.²¹

²¹ Shaista Naznin, 'Discrimination in Realizing Women's Inheritance and Property Rights in Pakistan', *Journal of Law and Society*, 45:65 (July 2004).