



Child Marriage Restraint Act Of Bangladesh: Protecting The Best Interests Of The Child Or Encouraging The Child Marriage

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ABSTRACT

Child marriage is a widespread social tendency in Bangladesh, especially for the females. There are various causes of child marriage but the most important ones are deprivation, superstition, a lack of social stability and illiteracy. In Bangladesh, the Child Marriage Restraint Act of 2017 was passed to replace the 1929 law, continuing Bangladesh's string of attempts to discourage the child marriages. Although this new law is an improvement over the previous one in certain ways but the unique provision in this Act which permits the child marriage in certain circumstances when it is in the child's best interest is the subject of the most heated dispute. It is profoundly concerning matter to allow the child marriage in the name of protecting their best interests because this provision just deliberately promotes the child marriages, which could be a threat to the improvement of the children in Bangladesh.

Keywords: *Child Marriage, Special Circumstances, Best Interests of the Children, Protection, Bangladesh.*

INTRODUCTION

Children are the most vulnerable and unprotected segment of the society. They are dependent on their parents and others for their development and they require support from the family, the community and also from the entire state. A significant number of children in Bangladesh are deprived of their fundamental human rights due to deplorable health, nutrition, education and social conditions.¹ In addition, child marriage poses a significant threat to the well-being of children in Bangladesh. Nowadays, one of the key demographic factors influencing the number of female children born in Bangladesh is the prevalence of early marriage. Parents push their daughters to marry young in hopes of financial and social benefits. Young girls are frequently viewed as a financial burden on their families and early marriage is viewed as a means of alleviating this burden. As a result, parents encourage early marriage out of concern that their daughters' dowries will increase with age.²

Generally, the institution of marriage is significant for both the individual and society as a whole. In countries, where marriage is the only legal link for the procreation of offspring, it is also a significant and memorable moment in the life cycle for the individual as well as the basis of the family. So, marriage also signifies the passage into adulthood.³ However, child marriage, which is defined as marriage before the age of 18, is a reality for millions of women around the globe, particularly in developing nations and it is a serious health and human rights issue. Particularly prevalent among the impoverished and rural residents of developing nations and it is anticipated that 142 million minor marriages will occur between 2011–2020 and 151 million in 2021–2030.⁴

¹ Nahid Ferdousi, 'Child marriage in Bangladesh: Socio-legal analysis' International Journal of Sociology and Anthropology (January 2014) Vol. 6(1) pp 1-7 <<http://www.academicjournals.org/IJSA>> accessed 28 June 2023.

² Badrud DM, South Asia Study of Population Policy and Programme: Bangladesh (1990) UNFPA pp 11-12.

³ Lawrence DE Ikamari, 'The effect of education on the timing of marriage' Demographic Research (2005).

⁴ UNFPA, *Marrying Too Young: End Child Marriage* (2012) New York.

Child marriage is still common in South Asia, where more than half of all "child marriages" happen. Even though there are rules that try to stop it, but there are still a lot of child marriages in the countries of southern Asia and this is one of the biggest human rights problems for the region's growth.⁵ In patriarchal societies, a perilous combination of entrenched poverty and customs continues to sustain the harmful practice of child marriage, particularly among girls. Economic constraints, customary law, culture and tradition frequently trump national policies and legislation, preventing existing education programs from effectively retaining females in school. Consequently, child marriage continues to thrive in the region, despite the fact that the minimal legal age for a girl's first marriage is an official agenda.⁶

OBJECTIVES

The objectives of the proposed research are:

1. To find out whether the Child Marriage Restraint Act, 2017 contains any standard for determining the best interests of the child in Bangladesh.
2. To analyze that how far the Child Marriage Restraint Act, 2017 can protect the best interests of the child.
3. To make possible recommendations on how to improve the Child Marriage Restraint Laws for the best interests of the child in Bangladesh.

RESEARCH QUESTIONS

The research aims to answer the following questions:

1. Whether or not the Child Marriage Restraint Act, 2017 provides any standard to measure the best interests of the child?
2. Is the law sufficiently protecting the best interests of the child?

METHODOLOGY

This research is predominately doctrinal in nature and this paper is literary based with an overall mixture of analytical reasoning. The majority of the investigation resources come from secondary sources, but some data and information are gathered from primary sources, such as domestic legislation, case decisions, international legal instruments and the law reports, journal articles, articles, online journals, e-books, organization-published reports are consulted as secondary sources.

CONCEPTUAL AND THEORETICAL FRAMEWORK

Child marriage is a worldwide issue that affects approximately 15 million females annually and South Asia has the highest incidence of girls marrying during childhood or early adolescence, while Bangladesh has the third-highest incidence of child marriage around the world.⁷ In this chapter, it will discuss the conceptual and theoretical framework of the thesis. Here, this chapter will thoroughly describe the definition of the child under national and international instruments, concept of marriage as well as the theory and concept of the best interests of children.

Definition of Child

In Bangladesh, there is no comprehensive definition of a child and also, the definition of a child fluctuates from Act to Act. So, in order to provide a foundational comprehension of a child's age, it will now describe the definition of a child under both the national and international instruments.

The United Nations Convention on the Rights of the Child, 1989, defines a child as a person who is less than 18 years old,⁸ whereas The Children Act, 1974 defines a child as a person who is less than 16 years old,⁹ however, the provision of the 1974 Act has been replaced by the Children Act, 2013,¹⁰ which is now in effect in Bangladesh and defines a child as a person who is less than 18 years old.¹¹ The 'National Children Policy, 2011' also defines a child as an individual younger than 18 years of age. However, 'The Penal Code, 1860' which prevails in Bangladesh, contains various provisions regarding minors but there is no uniform definition of "child" there.

⁵ Anita Raj, Saggurti, Niranjana Balaiah, & Silverman, 'Prevalence of child marriage and its effect on fertility and fertility-control outcomes of young women in India: a cross-sectional, observational study' *The Lancet* 373(9678) 1883–1889 (2009).

⁶ ICRW, 'Child Marriage in Southern Asia: Policy Options for Action' (2012) Washington DC.

⁷ Anita Raj, Lotus McDougal and Melanie Rusch, 'Changes in Prevalence of Girl Child Marriage in South Asia' *The Journal of American Medical Association* Vol. 307 pp 2027–29 (2012) <<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4386922/>> accessed 20 July 2023.

⁸ The United Nations Convention on the Rights of the Child 1989, art 1.

⁹ The Children Act 1974, s 2(f).

¹⁰ Act No. XXIV of 2013.

¹¹ The Children Act 2013, s 4.

According to Muslim law, a child attains adulthood at puberty, which is of course varies person to person. So, as a result, it typically sets the age at 13 or 14 years for females and 15 or 16 years for a boy which converts a child as an adult person in Sharia Law. Thus, a person who has become an adult under Sharia law may still be regarded as a child under modern legal systems.¹² Further, according to Bangladesh Labor Act, a person who is below 14 years of age is treated as child.¹³ However, according to the Child Marriage Restraint Act, 2017, in the case of marriage, a person is considered as a minor if, as a male, they have not reached the age of 21 years and as a female, they have not reached the age of 18 years.¹⁴ Finally, it may state that different laws have different definitions of what constitutes a "child."

Concept of Marriage

In general terms, marriage is a social institution that legalizes the sex relationships and the birth of a child. According to the modern author Syed Ameer Ali, marriage is instituted for the protection of society so that individuals can protect themselves from immorality and foulness.¹⁵

In Bangladesh, as there is no 'Uniform Family Code', so, in the case of marriage, it varied based on Civil law and the numerous personal laws which are in effect in Bangladesh. Generally, the legal age of marriage for men is 21 years and for women is 18 years old in Bangladesh.¹⁶ According to the Muslim Law which prevails in Bangladesh, a child may be given in marriage by a guardian until puberty, although after attaining adulthood, he or she has the right to annul the marriage within one year.¹⁷

The UDHR, 1948 about marriage states that it can only be contracted with the free and informed assent of both the parties¹⁸ and also the CEDAW requires that both parties to a marriage should give their consent.¹⁹ But, in Bangladesh, the Child Marriage Restraint Act of 2017 does not require the minor child's consent, regardless of whether he or she is a male or a girl. Their parents may give consent on their behalf and the court may grant permission to sanction the marriage, if the decision to give them in marriage is made in their best interests.²⁰ Therefore, in order to constitute a marriage, the consent of both parties is required.

Theory and Concept of Best Interests of Child

Generally, the "best interest of the child" principle is a central tenet of the global child rights protection movement and it primarily pertains to family disputes involving custody, guardianship, maintenance, adoption of the child and other matters. The central goal of this principle is that, whenever policies, laws or decisions that directly or indirectly affect children are formulated, the political, economic and social interests of the child should be accorded due consideration and priority.²¹

The English common law paved the way for common law nations to recognize the concept of the child's best interests as the primary factor in custody cases. Although the best interest of the child standard originated in the context of custody disputes and its application to all child-related matters that became a new trend beginning in the 20th century.²² In international context, the 'best interests of the child' standard is referred to as an 'umbrella provision' and is frequently invoked as a governing principle in numerous international instruments pertaining to children. Numerous international and regional instruments has contain this 'best interest of the child' standard in a variety of ways and cover a vast array of topics.²³

Using a chronological reference based on the date of adoption, the first international document to contain this concept is the United Nations Declaration on the Rights of the Child, which states that the best interests of the

¹² Dr. Muhammad Ekramul Haque, 'Muslim Family Law Sharia and Modern World' London College of Legal Studies (South) (June 2015) p 73.

¹³ Bangladesh Labor Act 2006, s 2(63).

¹⁴ The Child Marriage Restraint Act 2017, s 2(1).

¹⁵ *Ibid*, n 23 pp 46-47.

¹⁶ The Child Marriage Restraint Act 2017, s 2(3).

¹⁷ *Ibid*, n 23 pp 74-75.

¹⁸ The Universal Declaration of Human Rights 1948, art 16.

¹⁹ The Convention on the Elimination of all Forms of Discrimination against Women 1979, art 16.

²⁰ Child Marriage Restraint Act 2017, s 19.

²¹ Stephen Parker, 'The Best Interests of the Child: Principles and Problems; The Best Interest of the Child; Reconciling Culture and Human Rights' International Journal of Law, Policy and the Family Vol. 8 Issue 1 p 27 (1994).

²² Marriane Blair and Merle Hope Weiner, 'Resolving Parental Custody Disputes – A Comparative Exploration' (2005) 39 (2) Family Law Quarterly 247, 247.

²³ Jonathan Todres, 'Emerging Limitations on the Rights of the Child: The U.N Convention on the Rights of the Child and Its Early Case Law' (1998) 30 Columbia Human Rights Law Review 159, 160.

child must be the paramount consideration when enacting any law to protect and assist children²⁴ and CEDAW is the second international instrument that contains the best interest principle. In accordance with this convention, while eliminating discrimination and guaranteeing equal rights of parents regarding their children, states shall prioritize the child's best interests.²⁵ The third international document referencing this concept is the Convention on the Civil Aspects of International Child Abduction,²⁶ whose preamble recognizes that the child's best interests are of paramount importance in custody matters. Further, Convention on the Rights of the Child²⁷ is the fourth international document containing the concept of the best interests of the child and the most important international instrument pertaining to child rights. This concept of the best interests of the child is prevalent throughout the convention, imposing numerous obligations on state parties to consider the best interests of individual children in relevant decision-making processes, particularly in cases involving family matters and juvenile justice. The best interests of the child is one of the four overarching principles that guide children's rights that the right to not be treated unfairly, the right to life, survival and development as well as the right to participate or have heard and taken into account.²⁸

In Bangladesh, the concept of 'best interests of child' also emerged in child custody cases. Here, the primary legislations regarding child custody are the Family Courts Ordinance 1985²⁹ and the Guardians and Wards Act, 1890.³⁰ While adhering to statutory requirements, courts always attempt to make custody decisions based on the child's best interests. Various case laws have been developed in this regard by the decisions and precedents of the higher courts and the essence of these precedents is that the family court's power to determine the entitlement of a party to the custody of a child is not limited to mere observance of the respective personal laws of the parties, rather, the paramount consideration is the welfare and best interest of the minor child.³¹ There are two cases by which the principle of the best interests of child is established in Bangladesh and those are "*Abu Baker Siddique v. SMA Bakar*"³² and "*Abdul Jalil and others v. Sharon Laily Begum Jalil*"³³ case.

In the *Abu Baker* case, the Court ruled that under Muslim law, if there were circumstances that made it right for a party to lose custody of his child and it will be for the best interests of that child, then the judges did not hesitate to do so and in the *Abdul Jalil* case, the Court said that nothing is more important, not even the rights of the parties under the rules of personal law or statutory provisions, than the welfare and best interests of the children, which must be the deciding factor in deciding the question of custody of children, whether in a habeas corpus proceeding or a proceeding for guardianship under the Guardians and Wards Act, 1890.³⁴

Further, aside from the custody cases, the concept of best interest of the child has been referenced by higher courts in a variety of cases involving children, particularly in criminal cases. In a significant number of cases, the Supreme Court of Bangladesh has dynamically interpreted the constitutional provisions and other laws pertaining to children with the active assistance of the provisions and principles of CRC, as well as, has directed the concerned state agencies and the courts at the District level to consider the children's best interests when dealing with child-related issues.³⁵ In "*State v. Md. Roushan Mondol Hashem*",³⁶ the Court ruled that the children a waiting for trial must remain in the custody of their parents for their best interests. Again, in "*State v. The Metropolitan Police Commissioner, Khulna and Others*",³⁷ the High Court Division stated "although the domestic laws have not incorporated with the beneficial provisions of the UNCRC, they are not in conflict with our domestic laws, with the exception of Article 21 on adoption". Thus, they may be considered when determining what is in the best interest of the child. Therefore, it can now state that the concept of the child's best interests is a well-established principle in Bangladesh due to judicial decisions.

²⁴ Declaration of the Rights of the Child 1959, UN G.A. Res. 1386 (XIV) principle no. 2.

²⁵ Convention on the Elimination of All Forms of Discrimination against Women 1979, art 16(1)(d).

²⁶ Convention on the Civil Aspects of International Child Abduction was adopted at Hague Conference on Private International Law in 1980 to protect children from the harmful effects of cross-border abductions and wrongful retentions by providing a procedure designed to bring about the prompt return of such children to the State of their habitual residence.

²⁷ Convention on the Rights of Child was adopted and opened for signature, ratification and accession by General Assembly resolution 44/25 of 20 November 1989 and entered into force on 2 September 1990.

²⁸ The United Nations Convention on the Rights of Child (UNCRC), art 9, 18, 20, 21, 37(c), 40(2) (b) (iii).

²⁹ Ordinance No. XVIII of 1985.

³⁰ Act No. VIII of 1890.

³¹ Zahid Ahmed, 'Law on Child Custody' the Independent (Online) (April 2017) <| theindependentbd.com> accessed 20 July 2023.

³² *Abu Baker Siddique v SMA Bakar* (1986) 38 DLR (AD) 106.

³³ *Abdul Jalil v Sharon Laily Begum Jalil* (1998) 50 DLR (AD) 55.

³⁴ *Ibid.*

³⁵ Abul Hasanat and Md Iqbal Mahmud Fahim, 'Judicial Use of UNCRC in Protection of Child Rights in Bangladesh' (2014) 8(1) World Vision Research Journal 17, 25.

³⁶ *State v Md Roushan Mondol Hashem* (2007) 59 DLR (HCD) 72.

³⁷ *State v The Metropolitan Police Commissioner, Khulna* (2008) 60 DLR (HCD) 660.

FINDINGS

This paper analyzes whether the Child Marriage Restraint Act of 2017 protects the best interests of the child or not. Throughout this research, the following conclusions have been reached:

- i. Generally, child marriage is common in every country but Bangladesh is the only country which allows child marriage with a special provision in the name of children's best interests and this is in contrast to Bangladesh, which allows child marriage with a special provision.
- ii. The Child Marriage Restraint Act of 2017 affects the child's interests negatively, as there is no mechanism or standards for measuring the child's best interests in this Act.
- iii. As child marriages are permitted under special circumstances under the Child Marriage Restraint Act of 2017, so the Government will be unable to safeguard the human rights of the children, which could be a threat to the improvement of the children.
- iv. According to the special provision (section 19) of the Child Marriage Restraint Act of 2017, a victim girl is forced to marry her accused rapist in the name of caring for her expectant child but one may not marry an accused rapist in the name of caring for her unborn child. Nonetheless, if one marries her accuser in such a circumstance, then this provision will not serve the child's best interests. So, clearly, there is no possible defense for this provision.
- v. The legalization of child marriage in any context is not a favorable sign because it hinders the progress of women's empowerment and the overall advancement of women and girls. Therefore, in this situation, the best interests of a child can never be protected.
- vi. The fact that this particular provision unintentionally encourages the child marriages which makes it difficult to end child marriages in Bangladesh. Therefore, this specific provision exhibits inconsistency with the intended purpose and aims of the Act.

RECOMMENDATIONS

Bangladesh has amended its 88-year-old legislation, which is undoubtedly a commendable move but there are numerous issues with this new legislation. Therefore, by using a combination of immediate and enduring strategies, it is possible to significantly reduce the level of criticism and those strategies are:

1. The current legal system contains a number of exceptions and loopholes that under specific conditions, such as; with parental approval or in unique situations, it permits child marriages. As mentioned before discussion that under certain conditions, section 19 of this Act permits child marriage, which ultimately demonstrates how the parties might enter into a child marriage with the court's approval. Therefore, these clause defeat the law's intended objective and leave possibilities for misuse this Act.³⁸ So, if these loopholes can be closed or made more restrictive through legal reform, then there is a possibility that the number of marriages between children in Bangladesh will be decreased.
2. Regarding the marriage of minor girls for their best interests under the special circumstances, the Act must clarify certain aspects, such as; what constitutes the best interests of the parties? How can the best interests be determined? What constitutes a special circumstance? Regarding the concept of best interests and the determination of best interests, the Government should establish rules clarifying the aforementioned issues and should organize training for Judges in this regard. Kazi Rezaul Hoque, the Chairman of the National Human Rights Commission of Bangladesh, commenting on this issue, urged the Government to take a proactive posture and provide training for judges in order for them to effectively deal with the unique circumstances.³⁹
3. There should be a hard and fast rule about the earliest age at which a girl can be married even under the special circumstances and about such age, there shall no exception be permitted. This stipulation must be adhered to stringently. In such cases, when marriage is permitted under exceptional conditions, it must imperative to verify the comprehensive and genuine consent of the both individuals engaged.⁴⁰ Without the parties' genuine consent, the marriage should not be solemnized. Therefore, in thus way, child marriage might be prevented.
4. In addition to penalizing child marriage, the Government should consider the legal status of marriages solemnized outside of special circumstances and in this instance, Bangladesh can emulate India's model that the marriage should be voidable at the discretion of the underage party, regardless of whether or not the

³⁸ Tasnim Maksud, 'Necessity to reform the Child Marriage Restraint Act' The Daily Star (July 2023) <Necessity to reform the Child Marriage Restraint Act | The Daily Star> accessed 28 July 2023.

³⁹ Mahadi Al Hasnat, 'NHRC Chief: Section 19 of Child Marriage Restraint Act 2017 is frustrating' Dhaka Tribune (online) (25 April 2017) <NHRC Chief: Section 19 of Child Marriage Restraint Act 2017 is frustrating (dhakatribune.com)> accessed 28 July 2023.

⁴⁰ Shirin Sultana and Shahorin Sultana, 'Protecting the Best Interests of the Child: The Child Marriage Restraint Act, 2017 of Bangladesh in Consideration' Dhaka University Law Journal Vol. 28 (2017) <https://scholar.google.com/scholar?hl=en&as_sdt=0%2C5&scioq=the+effect+of+education+on+the+timing+of+marriage+&q=Protecting+the+Best+Interests+of+the+Child%3A+The+Child+Marriage+Restraint+Act%2C+2017+of+Bangladesh+in+Consideration%E2%80%99&btnG=#d=gs_qabs&t=1693593747318&u=%23p%3DYpxJkTstUwUJ> accessed 10 July 2023.

marriage was consummated.⁴¹ However, below a certain age, which could be 16 years old and in cases of coercion and fraud, marriages should be declared invalid. Thus, the incidence of child marriage in Bangladesh might be reduced.

CONCLUSION

Therefore, finally in light of the preceding discussion, it can be concluded that the 'best interest' theory, which may be traced to early English Law, was seen as the most important factor to take into account in custody disputes and now it progressively evolved into a new trend in handling the children's matters. The Child Marriage Restraint Act of 2017 is the most recent law pertaining to this 'best interest' theory in Bangladesh and this Act permits the Court to approve the marriage of adolescent boys and girls in exceptional cases where it is in the best interest of the child. However, this Act is completely silent on the negative effects of this unique provision and also, it only provides a special provision for such marriages but does not provide any standard for measuring the child's best interests.

Furthermore, legalizing child marriage under this Act, in any circumstance in the name of the best interests of child is not a positive sign for Bangladesh and as this particular provision is inconsistent with the intended purpose and objectives of the Act, as well as with some actions which implemented by the Government of Bangladesh and other organizations, so this Act never can be served the best interests of a children. It only indirectly promotes the occurrence of child marriages. Consequently, the Government of Bangladesh should reconsider this provision and the relevant parties might take into account the aforementioned advice in this regard to make such Act more effective. Therefore, last but not least, Bangladesh should act quickly and effectively to prevent child marriages at all costs with taking into account all the difficulties mentioned in this study because if Bangladesh should not act quickly and effectively, then it could be a threat to the improvement of the children in Bangladesh.

REFERENCES

1. Abul Hasanat and Md Iqbal Mahmud Fahim, 'Judicial Use of UNCRC in Protection of Child Rights in Bangladesh' (2014) 8(1) World Vision Research Journal 17, 25.
2. Afrose Jahan Chaity, 'Rights activists question whether child marriage Act serves children's best interest' Dhaka Tribune (online) (20 August 2017) <<http://www.dhakatribune.com/bangladesh/law-rights/2017/08/20/rights-activists-question-whether-child-marriage-act-serves-childrens-best-interest>> accessed 10 July 2023.
3. Anita Raj, Lotus McDougal and Melanie Rusch, 'Changes in Prevalence of Girl Child Marriage in South Asia' The Journal of American Medical Association Vol. 307 pp 2027-29 (2012) <<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4386922/>> accessed 20 July 2023.
4. Bridgette Carr, 'Incorporating a 'Best Interests of the Child' Approach into Immigration Law and Procedure' (2009) 12 Yale Human Rights and Development Journal 120, 125.
5. Elizabeth Warner, 'Behind the Wedding Veil: Child Marriage as a Form of Trafficking in Girls' (2004) 12 American University Journal of Gender, Social Policy & the Law 233, 269-70.
6. ICRW, 'Child Marriage in Southern Asia: Policy Options for Action' (2012) Washington DC.
7. Jonathan Todres, 'Emerging Limitations on the Rights of the Child: The U.N Convention on the Rights of the Child and Its Early Case Law' (1998) 30 Columbia Human Rights Law Review 159, 160.
8. Mahadi Al Hasnat, 'NHRC Chief: Section 19 of Child Marriage Restraint Act 2017 is frustrating' Dhaka Tribune (online) (25 April 2017) <NHRC Chief: Section 19 of Child Marriage Restraint Act 2017 is frustrating (dhakatribune.com)> accessed 28 July 2023.
9. Nahid Ferdousi, 'Child marriage in Bangladesh: Socio-legal analysis' Academic Journals Vol. 6(1) pp 1-7 (January 2014) <<http://www.academicjournals.org/IJSA>> accessed 10 July 2023.
10. Stephen Parker, 'The Best Interests of the Child: Principles and Problems; The Best Interest of the Child; Reconciling Culture and Human Rights' International Journal of Law, Policy and the Family Vol. 8 Issue 1 p 27 (1994).
11. Tasnim Maksud, 'Necessity to reform the Child Marriage Restraint Act' The Daily Star (July 2023) <Necessity to reform the Child Marriage Restraint Act | The Daily Star> accessed 28 July 2023.
12. UNFPA, Marrying Too Young: End Child Marriage (2012) New York.
13. UNHCR, 'Guidelines on Determining the Best Interests of the Child' (May 2008) <<http://www.unhcr.org/protect/PROTECTION/4566b16b2.pdf>> accessed 28 July 2023.

⁴¹ Elizabeth Warner, 'Behind the Wedding Veil: Child Marriage as a Form of Trafficking in Girls' (2004) 12 American University Journal of Gender, Social Policy & the Law 233, 269-70.

14. UNICEF, 'Child Marriage and the Law: Legislative Reform Initiative Paper Series' (January 2008) <[https://www.unicef.org/policyanalysis/files/ Child_Marriage_and_ the_ Law \(1\).pdf](https://www.unicef.org/policyanalysis/files/Child_Marriage_and_the_Law_(1).pdf)> accessed 10 July 2023.
15. Zahid Ahmed, 'Law on Child Custody' the Independent (Online) (April 2017) <| theindependentbd.com> accessed 20 July 2023.

