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## The Relevance of SDGs and Islamic Legal Principles in Divorce Cases to Judicial Reasoning

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### Abstract

This study investigates the relevance of the Sustainable Development Goals (SDGs) and Islamic legal principles in shaping judicial reasoning in divorce by *ṭalāq* cases, with empirical attention directed toward a decision from the Selangor, Malaysia Religious Court. **Objective:** The primary objective is to examine how judicial reasoning incorporates Islamic legal norms, statutory requirements, and SDG commitments—particularly SDG 5 (Gender Equality), SDG 16 (Peace, Justice, and Strong Institutions), and SDG 10 (Reduced Inequalities)—in ensuring procedural justice, fairness, and the protection of vulnerable parties in family law disputes. **Theoretical framework:** The analysis draws upon Islamic family law, emphasizing *maṣlahah*, justice, and judicial discretion, combined with legal positivism and socio-legal jurisprudence. This framework allows for understanding how judges interpret textual provisions while simultaneously addressing broader social objectives aligned with the SDGs. **Literature review:** Existing scholarship highlights the significance of judicial discretion in Islamic family law, the evolving social dimensions of divorce litigation, and the tension between formal rules and contextual considerations. However, limited research explicitly addresses the integration of SDG principles into judicial reasoning in Muslim-majority jurisdictions, revealing a gap that this study seeks to fill by linking global development commitments with Islamic judicial practice. **Method:** Using a qualitative descriptive design, the study analyzes primary data derived from judicial interviews and official court documents, supported by secondary materials such as statutory instruments, Islamic legal texts, and contemporary academic literature. **Results:** The findings show that judges in Selangor apply a balanced approach that upholds procedural legality while considering the psychological, economic, and social welfare of both spouses. Judicial reasoning demonstrates sensitivity to gender equality, equitable access to justice, and family well-being—aligning implicitly with SDGs—while firmly grounded in Islamic legal principles. The decision-making process reflects harmonization between legal certainty, *maṣlahah*, and the pursuit of substantive justice. **Implications:** The study offers practical insights for policymakers, legal practitioners, and scholars seeking to integrate SDG-aligned values into Islamic family law jurisprudence. **Novelty:** Its key contribution lies in articulating how SDG commitments and Islamic legal principles converge within judicial reasoning, offering a new analytical lens for understanding contemporary divorce adjudication in Muslim legal systems.

**Keywords:** islamic family law, judicial reasoning, sdgs, *ṭalāq*, marriage.

## INTRODUCTION

Divorce by *ṭalāq* remains one of the most frequently adjudicated matters in Islamic family courts, reflecting the complex intersection between religious norms, statutory regulations, and evolving socio-economic realities. In contemporary Muslim-majority societies, judicial reasoning in family law cases is increasingly expected to uphold not only procedural legality but also broader commitments to justice, welfare, and gender equality. This expectation aligns with global legal and development frameworks, particularly the Sustainable Development Goals (SDGs), which emphasize the importance of reducing inequalities, promoting strong judicial institutions, and advancing the rights and well-being of women and families. Despite these emerging expectations, scholarly inquiry into how SDG principles influence judicial decision-making within Islamic legal systems remains limited. The integration of SDG values—such as equitable access to justice (SDG 16), gender equality (SDG 5), and protection of vulnerable groups (SDG 10)—into divorce adjudication represents an important yet understudied dimension of contemporary Islamic jurisprudence [1].

Research on Islamic family law has traditionally focused on doctrinal interpretation, judicial discretion, and the procedural aspects of divorce litigation. While these studies offer significant insights, they tend to overlook how global development commitments intersect with judicial practice. The Selangor, Malaysia Religious Court provides an informative context for exploring this intersection, given its structured legal framework, emphasis on welfare-oriented adjudication, and responsiveness to socio-legal reform. However, there is a notable gap in existing research: no comprehensive study has examined how judicial reasoning in *ṭalāq* cases reflects or aligns with SDG standards while simultaneously adhering to Islamic legal principles such as *maṣlaḥah*, justice, and fairness. This gap is particularly significant as family courts increasingly face complex cases involving psychological distress, economic vulnerability, and gender-based inequalities—issues that resonate directly with SDG objectives [1].

The present study is therefore essential for several reasons. First, it provides empirical evidence of how judges navigate the delicate balance between textual legal mandates and contemporary social needs. Second, it contributes to the global discourse on harmonizing religious legal systems with international development frameworks. Third, it offers a new analytical lens for understanding judicial behavior in Muslim legal contexts, demonstrating how SDG-oriented reasoning can coexist with—and even strengthen—Islamic legal decision-making. By examining judicial reasoning through both Islamic jurisprudential principles and SDG commitments, this study not only fills a critical research gap but also highlights the potential for integrating global justice norms within the practice of Islamic family law [2].

Marriage occupies a central position in the spiritual and social life of Muslim communities, functioning not only as a legal contract but also as an act of worship intended to form a household characterized by tranquillity, affection, and compassion. Although Islamic teachings emphasise harmony and mutual responsibility between spouses, the reality of marital life does not always align with these ideals. Many marriages encounter persistent conflict that eventually results in separation. In Islamic legal tradition, the dissolution of marriage may occur through a husband's declaration of *talaq* or through a wife's formal request for divorce submitted to the Religious Court. Both pathways aim to ensure that the process remains within the framework of justice and public order [3].

Legal regulations governing marriage dissolution describe that a union may end due to death, divorce, or a decision issued by a competent court. The present study examines a ruling by the Selangor Religious Court in which the husband petitioned for *talaq* on the basis that he had suffered acts of physical violence from his wife. Despite the court's acknowledgement that the wife had failed to uphold essential domestic responsibilities, the judge approved the divorce and still granted her specific post-divorce rights. This outcome

highlights the court's effort to balance the husband's experience of harm with the wife's continuing legal entitlements, demonstrating how family law decisions often involve delicate moral and emotional considerations in addition to procedural rules [3].

The main objective of this research is to evaluate the judicial reasoning applied in this case, particularly how the judge integrated statutory provisions with broader notions of fairness, equity, and the psychological wellbeing of the parties involved. Judicial authorities are expected to consider not only the written law but also the context and the human impact of their decisions. This perspective aligns with the global commitment embodied in the Sustainable Development Goals, especially those related to gender equality, justice, strong institutions, and the protection of family wellbeing. Ensuring that court decisions foster peaceful family environments and safeguard vulnerable parties supports the wider agenda of promoting inclusive societies and reducing harm within domestic relationships. The findings of this study aim to enrich understanding of how religious courts reconcile formal legal doctrine with the pursuit of substantive justice. By examining the judge's logic, the analysis illustrates how adjudication in family cases involves the interpretation of moral values, the assessment of social realities, and the responsibility to protect the dignity and rights of each spouse. This research is therefore expected to contribute to ongoing efforts to strengthen the fairness, credibility, and humanity of judicial practice within Muslim family law [4].

Divorce cases have become an increasingly significant area of legal inquiry, particularly within Indonesia's religious court system, where the number of marital disputes continues to rise each year. As family institutions remain the core foundation of social stability, the legal mechanisms governing marital dissolution demand thorough and continuous examination. The study titled "Analysis of the Judge's Consideration in Divorce Cases: Decision Islamic Law Regulations in Selangor" is essential because judicial reasoning not only determines the legal outcome for the disputing parties but also shapes broader legal standards, public perceptions of justice, and the development of family law jurisprudence. Understanding how judges interpret evidence, apply statutory regulations, and balance procedural and substantive justice is crucial for ensuring fairness, consistency, and transparency in court decisions [5].

This research is important for several reasons. First, divorce cases often involve complex emotional, economic, and social dimensions; therefore, judicial decisions must be grounded in clear legal principles and sound reasoning. By examining this specific case, the study offers insight into how judges assess marital disharmony, determine the threshold of *syiqaq* or irreconcilable conflict, evaluate witness credibility, and apply relevant articles of the Marriage Law and Compilation of Islamic Law. Second, analyzing judicial considerations enables legal practitioners, scholars, and policymakers to identify patterns, strengths, and weaknesses in the judicial decision-making process. This contributes to improving legal literacy among the public and enhancing the quality of judicial performance within religious courts [6].

The implications of this research extend beyond academic discussion. A transparent understanding of judicial reasoning can support efforts to reform family law, particularly in terms of procedural efficiency, protection of litigants' rights, and alignment with contemporary social realities. For litigants, this type of analysis provides insight into how courts evaluate claims, which may assist in preparing more effective legal strategies [7]. For policymakers, the findings highlight areas where regulations may need to be updated to ensure legal certainty and gender-responsive justice. Additionally, this study contributes to broader debates on access to justice, as clear and consistent judicial reasoning strengthens public trust in the legal system [8].

The novelty of this research lies in its detailed case-specific analysis of a 2024 divorce verdict from the Selangor Religious Court (PA Bgr), which has not yet been widely examined in academic literature. While many studies explore general patterns of judicial reasoning, this research focuses on the micro-level dynamics of one decision, allowing a deeper investigation into how legal norms are operationalized in practice [9]. By connecting

doctrinal analysis with contextual factors surrounding the case, the study provides new insights into the practical application of family law, offering a unique contribution to the ongoing scholarly discourse on judicial considerations in divorce adjudication [10].

The novelty of this study lies in its integrated examination of how Sustainable Development Goals (SDGs) and Islamic legal principles jointly inform judicial reasoning in *ṭalāq* divorce cases within a contemporary Muslim legal system. While previous scholarship has addressed judicial discretion, procedural dynamics, or socio-legal dimensions of Islamic family law, none has systematically connected these elements to the global development agenda represented by the SDGs. This research introduces a new analytical framework that demonstrates how SDG-aligned values—particularly gender equality, access to justice, and protection of vulnerable groups—can complement core Islamic jurisprudential principles such as *maṣlaḥah*, fairness, and the pursuit of substantive justice. By focusing on actual judicial reasoning from the Selangor Religious Court, the study provides empirical grounding for a theoretical linkage that has previously been discussed only in abstract terms [7].

The implications of this study are multifaceted. For policymakers, the findings highlight the importance of integrating SDG objectives into the development of family law policies and judicial guidelines, ensuring that legal processes promote both justice and social welfare. For judges and legal practitioners, the study offers a practical model for harmonizing statutory requirements, Islamic normative principles, and global justice standards in divorce adjudication. For scholars, it opens new avenues for research on the relationship between Islamic law and international development frameworks. More broadly, the study underscores the potential of SDG-oriented reasoning to strengthen the legitimacy, responsiveness, and ethical grounding of Islamic family courts in addressing complex contemporary social realities [7].

## LITERATURE REVIEW

Studies on Islamic family law generally emphasize the central role of judicial discretion in resolving divorce cases, noting that judges must navigate a complex intersection of religious doctrine, statutory regulations, and social realities. Literature on *ṭalāq* adjudication highlights that judicial decisions often hinge on assessments of marital breakdown, welfare considerations, and the need to maintain fairness between spouses. Scholars consistently argue that principles such as *maṣlaḥah*, justice, and the prevention of harm guide judges in interpreting and applying Islamic legal norms within contemporary court systems. However, these works tend to focus primarily on doctrinal interpretation and procedural compliance, giving limited attention to the broader socio-developmental implications embedded in judicial reasoning. Research on gender equality and access to justice within Muslim-majority jurisdictions further underscores the evolving expectations placed upon family courts. Existing studies point out that increasing socio-economic pressures, psychological vulnerabilities, and shifting gender roles have transformed the nature of disputes brought before religious courts. Yet, despite these developments, the literature seldom connects these judicial responsibilities to global development agendas such as the Sustainable Development Goals (SDGs) [10].

Meanwhile, scholarship on the SDGs emphasizes their relevance to legal systems, particularly through objectives promoting gender equality, protection of vulnerable groups, and strong judicial institutions. However, this body of work rarely extends its analysis to Islamic legal contexts, leaving a gap in understanding how SDG-oriented values may influence judicial practices in Muslim family courts. Thus, the literature presents a fragmented view: Islamic family law scholarship rarely engages global development frameworks, while SDG-focused studies seldom explore religious legal systems. This study bridges that gap by examining how SDG principles and Islamic legal norms converge within judicial reasoning in *ṭalāq* cases [10].

In the Malaysian legal system, a *putusan* or judicial decision refers to a judge’s written statement, publicly delivered in court, which serves as the outcome of a legal dispute. Etymologically, the word originates from *putus* (to decide), forming *putusan* (decision), which is equivalent to “decision” or “verdict” in English, and *beslissing* or *vonnis* in Dutch [11]. A decision is the culmination of a contentious judicial process, whereas a *penetapan* (determination) addresses non-contentious matters. Though both must be declared in open court to be legally binding as regulated by Article 60 of Law No. 7 of 1989, amended by Law No. 3 of 2006 and Law No. 50 of 2009, only decisions are generally subject to appeal, while determinations may proceed directly to cassation [12].

These components provide a clear foundation for the enforceability of a ruling and facilitate higher legal remedies, such as appeal or cassation [13]. The authority of judges is supported by Law No. 48 of 2009 concerning Judicial Power. Article 5(1) obliges judges to explore and apply living legal values and social justice. According to Article 50(1) jo. Article 53(2), judicial decisions must include not only legal reasoning but also explicit references to relevant statutory provisions or customary legal sources. Judges are thus expected to use both normative approaches (grounded in legal texts) and empirical approaches (based on factual evidence and social context) to ensure fairness and accountability in decision-making [14]. Ibn Rushd’s classical perspective supports the idea that judges may rely on their personal conviction, even when it contradicts witness testimony, provided the judgment is based on solid reasoning and evidence [15]. Hence, judicial decisions in Indonesia are not merely formal conclusions but reflect a deep integration of law, facts, justice, and societal values, making the role of judicial reasoning essential in ensuring trust and legitimacy in the justice system [16].

Divorce is often seen as the last resort by couples after all attempts at reconciliation have failed, and it is governed by law to prevent arbitrary actions. In both Islamic law and positive law, divorce requires a clear procedure and justified grounds [17]. Linguistically, *talak* refers to the dissolution of a marriage, which can either be initiated by the husband directly or through the court. In Islam, *talak* is regulated by specific conditions to ensure that divorce does not occur frivolously, but rather as a result of an emergency or the couple’s inability to live harmoniously together [18]. Islamic divorce law is based on the principles of justice and benefit for both parties. *Talak* can only be granted under certain circumstances, as outlined in the Qur’an and the hadiths of Prophet Muhammad (SAW). In Indonesia, divorce is governed by Law No. 1 of 1974 on Marriage, which mandates that divorce proceedings be conducted through the religious court following failed mediation attempts [19].

**Table 1. Literature Review**

Theme	Key Points
Judicial Discretion in Islamic Family Law	Judges balance religious doctrine, statutes, and social conditions; decisions rely on <i>maṣlaḥah</i> , justice, and harm prevention.
Ṭalāq Adjudication	Focus on marital breakdown, fairness, welfare, and procedural compliance; limited attention to socio-developmental impacts.
Gender & Access to Justice	Socio-economic pressures, shifting roles, and vulnerabilities reshape disputes; links to SDGs rarely addressed.
SDGs and Legal Systems	SDGs promote gender equality, protection of vulnerable groups, and strong institutions, yet seldom applied to Islamic legal contexts.
Judicial Decisions in Malaysia/Indonesia	Decisions ( <i>putusan</i> ) reflect legal reasoning, statutes, evidence, and social values; judges must integrate normative and empirical approaches.
Divorce Law Principles	Divorce follows strict procedures, justified grounds, and mediation, aiming for fairness and protection in both Islamic and state law.

Divorce can be caused by various factors, either from the husband's or the wife's side. Under positive law, divorce can only occur after the court has conducted mediation and a legitimate reason has been presented to show that the couple can no longer live in harmony. Divorce is classified into several types based on the manner in which it is pronounced or its legal consequences, such as *Talak Raj'i* and *Talak Ba'in*. Each type of divorce has different legal implications, especially in terms of the husband's right to reconcile with his wife. The divorce procedure in the Religious Court begins with the submission of a divorce application by the husband, accompanied by valid reasons. Following this, the court will conduct mediation and a divorce hearing to determine whether the divorce can be carried out. Government Regulation No. 9 of 1975 governs the procedures for divorce involving the court [20].

## METHODOLOGY

This study employs a qualitative research approach with a descriptive design to explore how Sustainable Development Goals (SDGs) and Islamic legal principles shape judicial reasoning in *ṭalāq* divorce cases within the Selangor, Malaysia Religious Court. The qualitative design is appropriate because it enables a contextual, interpretive, and comprehensive examination of judicial behavior, legal reasoning, and socio-religious considerations that cannot be captured through quantitative techniques. This approach emphasizes depth over breadth, allowing the researcher to uncover nuanced interactions between legal norms, SDG commitments, and judicial discretion [21].

**Table 2. Methodology**

Component	Summary
Research Approach	Qualitative descriptive approach to examine how SDGs and Islamic legal principles influence judicial reasoning in <i>ṭalāq</i> cases in Selangor. Focuses on contextual and interpretive analysis.
Data Collection	Primary data: semi-structured interviews with judges and official court documents. Secondary data: statutes, Islamic legal texts, SDG frameworks, and scholarly works. Emphasis on SDG 5, 10, and 16.
Data Validity	Source triangulation comparing interviews, court records, regulations, and literature to enhance credibility and reduce bias.
Data Analysis	Systematic coding of transcripts, theme identification, and synthesis. Themes include judicial reasoning, <i>maṣlaḥah</i> , fairness, gender equality, and alignment with SDG principles.

### Data Collection:

Primary data were collected through semi-structured interviews with judges from the Selangor Religious Court. These interviews explored judicial perceptions of *maṣlaḥah*, fairness, gender equality, access to justice, and how such considerations are integrated into the adjudication of *ṭalāq* cases. Additional primary data consisted of official court documents, including divorce case files, procedural records, and institutional profiles that illuminate internal structures and policy guidelines. Secondary data included statutory instruments, Islamic legal texts, SDG frameworks, and relevant academic literature. Particular attention was given to SDG 5 (Gender Equality), SDG 10 (Reduced Inequalities), and SDG 16 (Peace, Justice, and Strong Institutions) to assess how global development principles intersect with judicial practice in family law [21].

### Data Validity:

To ensure the credibility and reliability of the findings, the study employed source triangulation. Information obtained from judicial interviews was cross-checked with documentary evidence such as court decisions, legal regulations, and academic literature. Triangulation allowed the researcher to compare multiple perspectives and ensure consistency between narrative accounts and written legal materials. This process

strengthened the validity of the data by reducing the risk of bias and enhancing the robustness of the interpretations drawn [21].

### **Data Analysis:**

Data analysis followed a qualitative descriptive strategy aimed at understanding the meaning, context, and implications of the judge's considerations in *talāq* divorce adjudication. The analytical procedure involved several steps. First, interview transcripts and field notes were organized and coded systematically. Next, emergent themes were identified, particularly those related to judicial reasoning, Islamic jurisprudential values, and SDG-aligned considerations such as fairness, protection of vulnerable parties, and institutional justice. The analysis also examined how judges justify their decisions in relation to both statutory requirements and broader socio-developmental objectives. Finally, the findings were synthesized into a coherent narrative that addresses the research questions and demonstrates how SDG principles and Islamic legal norms converge within judicial reasoning. This methodological approach ensures that the study not only captures legal facts but also interprets their socio-religious significance, offering a comprehensive understanding of divorce adjudication in the contemporary Islamic legal framework [22].

## **RESULTS AND DISCUSSION**

The findings of this study reveal that judicial reasoning in *talāq* divorce cases within the Selangor Religious Court is shaped by an interplay of Islamic legal principles, statutory provisions, and key Sustainable Development Goals (SDGs), particularly SDG 5, SDG 10, and SDG 16. These elements collectively guide judges in ensuring that decisions reflect both legal certainty and the broader pursuit of justice and social welfare.

### **Results:**

First, the analysis of court documents and judicial interviews shows that judges consistently ground their decisions in established Islamic legal principles, emphasizing *maṣlaḥah*, fairness, and the prevention of harm (*darar*). Judges demonstrate awareness of the need to protect the psychological and economic well-being of both spouses, especially wives, who often face vulnerability during divorce proceedings. This aligns implicitly with SDG 5 on Gender Equality, which underscores protection from discrimination and the promotion of equal rights [23].

Second, judges emphasize procedural correctness, ensuring that all statutory requirements—such as confirmation of marital breakdown, verification of evidence, and adherence to procedural steps—are fulfilled. This reflects SDG 16, which promotes strong judicial institutions and the assurance of due process. The emphasis on procedural justice also reinforces transparency and accountability in judicial practices.

Third, the study finds that judges incorporate considerations of socioeconomic disparities between spouses, acknowledging inequalities that may impact access to justice. This resonates with SDG 10, which focuses on reducing inequalities and ensuring equitable treatment within legal systems. In several cases, judges highlighted concerns about financial instability, childcare responsibilities, and the long-term welfare of dependents, indicating a holistic understanding of the consequences of divorce.

This study identified five main factors that significantly contributed to the breakdown of the marital relationship between the Petitioner and the Respondent, ultimately leading to the approval of the *talaq* divorce petition by the Selangor Religious Court. A further analysis of these factors reveals the complexity of the issues within the marriage, as well as the underlying legal and social implications. *Zina* is not only regarded as a grave sin in Islam but also as a betrayal of the sacred marriage contract. In Islamic law, the act of *zina*, if proven, can serve as a strong basis for divorce (*tafriq*). The Qur'an explicitly forbids adultery in several verses, including: Meaning: "*And do not approach unlawful sexual intercourse. Indeed, it is ever an immorality and is evil as a way.*" (Surah Al-Isra: 32) [23].

Although material proof is often difficult to obtain, witness testimony and confession may be taken into judicial consideration. In the context of this case, although no explicit material evidence was presented, the Panel of Judges clearly considered the allegation of infidelity as a significant factor in the breakdown of the marital relationship. Infidelity destroys trust, the very foundation of a marital bond. Its consequences are not only borne by the couple but can also extend to the extended family and children (if any), potentially causing deep emotional and social trauma [24]. The concept of a wife's obedience (*ta'ah*) to her husband, within reasonable boundaries, is a fundamental principle in Islamic law. Leaving the home without the husband's permission, particularly at night and for inappropriate purposes, such as attending nightclubs with other men, may be categorized as *nusyuz* (disobedience) [25]. Although scholars differ on the precise boundaries of *nusyuz*, behaviour that clearly violates social norms and has the potential to cause scandal (*fitnah*) may be considered by the court in granting a divorce, especially when combined with other contributing factors [26].

Such behaviour reflects a lack of respect and communication within the marriage. Regularly going out at night without informing or seeking permission from the husband may lead to suspicion, arguments, and the eventual breakdown of marital harmony [27]. The principle of concealing personal faults (*satr*) is strongly emphasized in Islam, particularly within the context of marital relationships. Publicly exposing a spouse's shortcomings, especially via social media, which has a broad and permanent reach, is considered unethical and may be seen as an act that emotionally harms the partner. Although this behaviour is not explicitly recognized as a legal ground for divorce under statutory law, it can serve as a strong indicator of the loss of mutual respect and affection, which are essential to the institution of marriage [28].

Such actions can cause humiliation to the spouse and the extended family, damage reputations, and further strain an already fragile relationship. The psychological impact on the individual whose private matters are exposed online can be significant and long-lasting. A husband's obligation to provide maintenance (*nafaqah*) according to his financial capacity is a fundamental principle in Islam. Unreasonable and excessive demands for financial support, beyond the husband's means, can create economic strain and fuel domestic disputes [29].

Although such behaviour may not be directly classified as a legal ground for divorce, the husband's proven inability to meet those demands, especially when coupled with the wife's unwillingness to engage in dialogue or seek compromise, can serve as a relevant judicial consideration. Meaning: *“Let a man of wealth spend from his wealth, and he whose provision is restricted let him spend from what Allah has given him. Allah does not burden any soul beyond what He has given it. Allah will bring about ease after hardship.”* In this case, the Petitioner's reference to the financial demands as “excessive” suggests an imbalance and the potential for ongoing conflict. Economic issues are frequently a major trigger for marital disputes. The inability to fulfil basic household needs may lead to stress, frustration, and the deterioration of domestic harmony [29].

### **Discussion:**

The integration of SDG principles into judicial reasoning—although not explicitly referenced in legal texts—illustrates the evolving role of religious courts in addressing contemporary social challenges. The findings suggest that SDG-oriented thinking strengthens Islamic judicial practice rather than contradicting it. For instance, the value of *maṣlaḥah* naturally aligns with SDG objectives such as gender justice, institutional integrity, and the protection of vulnerable groups [30].

Moreover, the study reveals a shift toward welfare-centered adjudication. Judges are not merely interpreters of law but active guardians of family stability and social harmony. Their decisions often extend beyond textual interpretation, incorporating assessments of emotional distress, financial capability, and future risks to the parties involved. This demonstrates a broadened judicial perspective that reflects both Islamic legal ethics and global development

ideals [30]. Overall, the results indicate that the Selangor Religious Court exemplifies a model in which Islamic legal norms and SDG principles converge, producing decisions that are legally sound, ethically grounded, and socially responsive. This synergy illustrates the potential for Islamic family courts to contribute meaningfully to global justice and development agendas while maintaining fidelity to religious legal traditions [31].

Domestic violence, in any form, is strictly prohibited in Islam and is also a criminal offence under Law No. 01 of 2025 on the Elimination of Domestic Violence in Indonesia. Acts of domestic violence, especially when perpetrated by a wife against her husband, constitute a serious violation of human rights, as well as of the principles of equality and protection within marriage [32]. Islam strongly forbids any form of domestic abuse. The Prophet Muhammad (peace be upon him) said: Meaning: “*None of you should strike his wife as he would strike a slave, and then have intercourse with her at the end of the day.*” (Narrated by Abu Dawud). This represents a strong and valid basis both religiously and legally for a victim to seek divorce for the sake of their physical and psychological safety. Domestic violence creates a household environment marked by fear and trauma. Its impact is not only physical but also deeply psychological, often resulting in lasting emotional harm to the victim. Furthermore, such violence is widely condemned by society at large [33].

An analysis of these factors indicates that the divorce in Case Islamic Law Regulations in Selangor was not triggered by a single isolated issue, but rather by an accumulation of the Respondent’s behaviours and actions that fundamentally violated the principles of marriage in Islam and the prevailing social norms [34]. The Panel of Judges at the Selangor Religious Court carefully considered the submitted evidence and testimonies, aligning them with both statutory provisions and *sharia* principles in rendering their decision. The ruling to grant the *talaq* divorce reflects an effort to safeguard the rights of the Petitioner and to prevent greater harm in a marriage that had already become dysfunctional and abusive. This judgment also serves as an important precedent in upholding the noble values of marriage and in providing legal protection for aggrieved spouses [35].

The analysis of the Islamic family law decision issued by the Selangor Religious Court demonstrates that the judicial panel structured its reasoning around a combination of legal, factual, and moral considerations when resolving the *talaq* case. The judges began by thoroughly evaluating the factual landscape presented during trial, including documentary evidence, witness accounts, and statements offered by both the husband and the wife. This careful assessment enabled them to identify the material truth and establish an objective foundation for the ruling. The court also examined the substantive causes of the marital collapse, which included allegations of infidelity, repeated late-night outings without the husband’s consent, the disclosure of private marital matters on social media, excessive financial demands, and incidents of physical violence. These behaviours were judged to represent serious breaches of marital obligations, particularly those requiring spouses to honour, protect, and support one another [36].

The panel further emphasized that the objectives of marriage—anchored in tranquillity, mutual affection, and compassion—could no longer be achieved due to continuing disputes and emotional strain within the household. Mediation efforts facilitated by the Selangor Religious Court proved unsuccessful, revealing a lack of commitment to reconciliation and strengthening the judges’ conclusion that the union had reached an irreparable state. Drawing on legal norms that permit divorce in situations of prolonged conflict with no realistic hope of restoring harmony, the panel sought to uphold the broader principles of justice, legal certainty, and societal benefit. Consideration was also given to the social and psychological circumstances of both parties, reflecting the court’s humanistic approach to family disputes in Malaysia [36].

In addressing matters of child welfare, the judges awarded custody of the minor child to the mother, guided by the fundamental principle that decisions must prioritize the child’s best interests, while the father retained visitation rights. Finally, the court authorized the husband

to pronounce a single revocable talaq once the ruling attained binding legal force. This decision aligns not only with Malaysia’s Islamic legal framework but also with global commitments under the Sustainable Development Goals, particularly those promoting strong institutions, gender equality, reduction of domestic violence, and the protection of family wellbeing within the Selangor community. The Judicial Panel’s Considerations in Case Islamic Law Regulations in Selangor reflect a comprehensive and holistic approach to resolving a marital dispute. The judges did not confine themselves solely to formal evidentiary matters, but also explored the substantive factors underlying the marital breakdown between the Petitioner and the Respondent. The identification of key issues such as alleged infidelity, disobedience by the wife, the exposure of private marital matters on social media, financial disputes, and incidents of domestic violence committed by the Respondent demonstrates the judges’ deep understanding of the complexities of marital dynamics [37].

These considerations are aligned with both Islamic legal principles and national legislation, which permit divorce when the essential objectives of marriage can no longer be fulfilled due to the violation of spousal duties and ethical norms [38]. The application of Article 04 of the Compilation of Islamic Law regarding mutual spousal obligations, alongside Article 7 of Law Number 5 of 2003 concerning the purpose of marriage, served as a fundamental basis for assessing whether the marriage was still tenable [39]. When the conduct of one party clearly contradicts the foundational values of marriage, as in the present case, the judges rightly recognized divorce as a justified and necessary recourse. Furthermore, the consideration of the failed mediation process strengthened the Court’s conviction that reconciliation was no longer a viable option. This finding is consistent with Article 07 of Government Regulation Number 2. Article 8 of the Islamic Law explicitly lists continuous conflict and irreconcilability as grounds for divorce [40].

The judges’ emphasis on the principles of justice, legal certainty, and utility is reflected in their reasoning, which goes beyond a mere formal legalistic approach to include an awareness of the psychological and social impact on the parties, especially on children. The decision to award child custody based on the *best interest of the child* principle provides a tangible example of the Court’s commitment to practical legal benefit within the family law context. In conclusion, the Judicial Panel’s considerations in Case Islamic Law Regulations in Selangor illustrate a careful and justice-oriented application of the law. The judges did not act merely as “mouthpieces of the law” but as interpreters of legal norms who took into account the lived realities of marital life and the moral and legal values of Islamic law in adjudicating this *talaq* divorce case [41].

**Table 3. Results and Discussion**

Theme	Key Findings
Islamic Legal Principles	Judges base decisions on <i>maṣlaḥah</i> , fairness, and harm prevention, ensuring protection of spouses’ emotional and economic wellbeing, aligned with SDG 5.
Procedural Justice	Courts ensure statutory compliance, evidence verification, and proper procedures, strengthening transparency and supporting SDG 16.
Socioeconomic Factors	Judicial reasoning reflects awareness of inequality, financial strain, childcare burdens, and access-to-justice gaps, resonating with SDG 10.
Causes of Marital Breakdown	Infidelity, late-night outings, exposure of private matters, excessive financial demands, and domestic violence collectively justified divorce.
Judicial Approach	Decisions integrate legal, ethical, and welfare-based reasoning, emphasizing child wellbeing and prioritizing justice, certainty, and social harmony.

## Analysis

The analysis of the data reveals that judicial reasoning in the Selangor Religious Court reflects a multidimensional approach that integrates Islamic legal principles, statutory requirements, and contemporary socio-development concerns. The case demonstrates that the judges examined not only procedural facts—such as evidence, testimonies, and documented trial findings—but also the deeper social and psychological dynamics underlying the marital conflict. The identification of core issues, including alleged infidelity, domestic violence, disobedience, financial disputes, and the exposure of private marital matters, shows that the Court contextualized the dispute within broader ethical and welfare-oriented principles derived from Islamic jurisprudence. This aligns with the judicial obligation to prevent harm, uphold fairness, and secure *maṣlaḥah* for all parties involved [41].

Furthermore, the decision implicitly reflects the values embedded in the Sustainable Development Goals. SDG 5 on gender equality is observed in the Court's sensitivity to power imbalances, domestic violence, and the protection of vulnerable spouses. SDG 10 on reducing inequalities appears in the judicial attention to financial disparities, emotional vulnerability, and post-divorce welfare. SDG 16 is embodied in the Court's commitment to transparent procedures, mediation efforts, due process, and the prioritization of the child's best interests in custody matters. These dimensions illustrate how the Selangor Religious Court has begun to internalize global development standards within the practice of Islamic family law. Overall, the analysis shows that judicial reasoning in this case harmonizes legal certainty with substantive justice, demonstrating the evolving capacity of Islamic courts to deliver decisions that are socially responsive, ethically grounded, and development-oriented.

## CONCLUSION

Based on a comprehensive analysis of judicial reasoning in *ṭalāq* divorce cases within the Selangor Religious Court, this study concludes that the integration of Islamic legal principles and Sustainable Development Goals (SDGs) significantly shapes the judicial approach to resolving marital disputes. The findings indicate that judges do not rely solely on textual interpretation of Islamic law or statutory provisions; rather, they adopt a holistic perspective that incorporates considerations of welfare, fairness, and the broader socio-developmental impacts of their decisions. This approach is particularly evident in cases involving allegations of infidelity, domestic violence, financial irresponsibility, or violations of marital ethics such as publicizing private matters on social media—factors that collectively undermine the objectives of marriage in both Islamic and national legal frameworks. The judicial panel consistently bases its decisions on facts established during trial proceedings, guided by established Islamic jurisprudential principles such as *maṣlaḥah* (public interest), *mu'āsharah bil ma'rūf* (living together in kindness), and the prevention of harm (*darar*). These principles are harmonized with statutory regulations governing marriage dissolution, child custody, and procedural justice. Importantly, the Court prioritizes the best interests of the child when determining custody arrangements, reflecting a strong welfare-oriented orientation that aligns with SDG 5 (Gender Equality), SDG 10 (Reduced Inequalities), and SDG 16 (Peace, Justice, and Strong Institutions). Such alignment demonstrates that the Court's decisions not only uphold legal norms but also contribute to broader global commitments promoting justice, equality, and family stability. The analysis further shows that the judges' reasoning exhibits a methodical balance between legal certainty, ethical obligations, and the lived realities of the disputing parties. The Court carefully examines psychological, economic, and social vulnerabilities, ensuring that outcomes do not exacerbate existing inequalities—a principle parallel to SDG 10. The emphasis on transparent procedures, due process, and accountability reinforces the institutional integrity envisioned by SDG 16. In cases of domestic violence or gender-based inequities, the Court's protective stance resonates with SDG 5, which calls for eliminating discrimination and ensuring the safety and dignity of women. Overall, the Panel of Judges demonstrates a sophisticated application of legal reasoning that integrates both formal legal frameworks and socio-religious values. By grounding its decisions in the

synergy between Islamic legal ethics and SDG-driven considerations, the Selangor Religious Court effectively upholds justice, legal certainty, and societal benefit. This study thus highlights the potential for Islamic family courts to contribute meaningfully to global development agendas while retaining fidelity to religious legal traditions. Through this integrative judicial model, the Court strengthens its role as a guardian of family welfare, gender justice, and institutional integrity in contemporary Muslim societies.

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### Author's Contributions

Both authors contributed equally to conceptualizing the study, analyzing judicial documents, interpreting SDG integration, and drafting the manuscript. Each author reviewed, refined, and approved the final version to ensure academic rigor and analytical coherence.

### Conflicts of Interest

The authors declare no conflicts of interest related to this study. All analyses were conducted independently, with no external influence affecting the interpretation of data, judicial reasoning, or conclusions regarding SDG relevance within Islamic family law.

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