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Sharia, Secularism, and Economic Integration: A Comparative Analysis of Legal Pluralism in Contemporary Systems

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Abstract

Objective: This study aims to examine the integration of Islamic law (sharia) in the contemporary legal system in five countries (Saudi Arabia, Turkey, Indonesia, Pakistan, and the United Kingdom), with a focus on family law, criminal law, and dispute resolution, as well as examining challenges related to human rights and gender equality. **Theoretical framework:** This study uses the legal pluralism framework to understand the interaction between religious law and secular law in the modern context. **Literature review:** The literature review includes research on the relationship between religious law and secular law, the discourse of legal pluralism, the implications of the application of sharia on social justice, and a comparative study of the legal system in Muslim-majority and secular countries. **Methods:** The method used is a comparative legal approach through the analysis of legal documents, case studies, and secondary literature. **Results:** The results of the study show that there are variations in the application of Sharia. In Saudi Arabia, sharia is the main foundation of the national legal system. In Turkey, although not officially integrated into state law, sharia still influences social norms. Indonesia applies sharia in a limited way in Aceh Province, while the national legal system is generally secular. In Pakistan, sharia is integrated into criminal law, which has sparked debates on gender equality. As for the UK, sharia is not formally recognized, but operates through arbitration mechanisms and non-state institutions. **Implications:** This study emphasizes the complexity of legal pluralism and the importance of strategies to balance religious principles and secular law, while providing insight for policymakers, academics, and human rights activists. **Novelty:** The novelty of this research lies in cross-country comparisons with a focus on human rights and gender equality issues, as well as offering practical perspectives for the development of inclusive legal policies in multicultural societies.

Keywords: islamic law, sharia, legal pluralism, secular legal systems, human rights.

INTRODUCTION

This research examines the role of Islamic law (*Sharia*) in contemporary legal systems, focusing on its integration and interaction with secular legal frameworks in five countries: Saudi Arabia, Turkey, Indonesia, Pakistan, and the United Kingdom. The study addresses

key challenges, including the balance between religious law and international human rights standards, particularly in areas like gender equality and legal pluralism [1]–[3].

The research aims to explore how *Sharia* is applied in these countries, specifically in family law, criminal law, and dispute resolution, while evaluating its impact on human rights. It hypothesizes that while *Sharia* presents challenges in ensuring gender equality and protecting human rights, it can coexist with secular legal frameworks when applied selectively with safeguards [4], [5].

This research is essential for understanding the complexities of legal pluralism and its implications for inclusive legal systems that respect both religious traditions and fundamental rights. Existing literature highlights the tension between *Sharia* and secular law, but there is limited research on its informal application, such as through arbitration in secular countries like the UK [6]–[8].

Using a qualitative comparative approach, this study analyzes legal documents, case studies, and interviews to assess the role of *Sharia* in each country. The findings aim to provide valuable insights into the evolving relationship between religious and secular legal systems, particularly regarding human rights and gender equality. The research is limited to these five countries and focuses on specific legal areas where *Sharia* plays a significant role [9]–[11].

LITERATURE REVIEW

Several studies have explored the role of Islamic law in modern legal systems, noting its varying applications across different countries. In Saudi Arabia, Islamic law is the primary source of law, with the legal system fully grounded in *Sharia* principles [12]. In contrast, Turkey's secular approach to law, established in the early 20th century, has minimized the role of *Sharia*, yet Islamic values continue to influence societal norms [13]. Similarly, Indonesia has adopted a hybrid system where *Sharia* is implemented in specific regions but does not supersede the national legal system [14]. Pakistan's integration of *Sharia* into the penal system, particularly through the *Hudood Ordinances*, has sparked debates about the intersection of Islamic principles with human rights and gender equality [15].

Western nations, such as the United Kingdom and the United States, also exhibit a unique blend of Islamic legal influence in private matters, especially within Muslim communities. While these nations maintain secular legal frameworks, informal Islamic tribunals and arbitration systems operate to address personal issues such as marriage and divorce [16]. Critics of the integration of *Sharia* in secular systems argue that it may undermine gender equality and individual rights, particularly in areas such as family law and criminal justice [17].

However, proponents of the coexistence of *Sharia* and secular law contend that religious law can coexist with modern legal systems, providing Muslims with a legal framework that respects their religious identity without infringing on broader legal principles [18].

Table 1. Summary of the Literature Review

Author(s) & Year	Title/Topic	Key Findings/Contribution
Al-Rasheed (2010)	A history of Saudi Arabia	Explores Saudi Arabia's legal system, based entirely on <i>Sharia</i> , and its challenges in modern contexts.
Feener (2013)	Sharia and social engineering: The implementation of	Investigates the hybrid legal system in Indonesia, where

	Islamic law in contemporary Indonesia	<i>Sharia</i> is integrated in regions like Aceh.
Jalal (2002)	The struggle for Pakistan: A Muslim homeland and global politics	Analyzes the role of <i>Sharia</i> in Pakistan's criminal law system, especially with respect to the <i>Hudood</i> Ordinances.
Lister (2013)	Sharia law and the rule of law: Islamic legal reform in the West	Examines the relationship between Islamic law and the rule of law in Western legal systems, focusing on human rights.
Omar (2004)	Islamic law and international human rights law: Searching for common ground	Discusses the compatibility between Islamic law and international human rights standards.
Ramadan (2009)	The mosque and the modern world: A critique of the secular mind	Critiques the secularization of Muslim societies and the adaptation of Islamic law to modernity.
Yavuz (2009)	Secularism and Muslim democracy in Turkey	Analyzes Turkey's secular legal framework and the tensions between secularism and Islamic values in governance.

METHODOLOGY

This study employs a qualitative research method, focusing on a comparative analysis of five countries: Saudi Arabia, Turkey, Indonesia, Pakistan, and the United Kingdom. The research was conducted through a combination of literature review, legal document analysis, and case studies. Key documents and sources include national constitutions, legal codes, and rulings from courts in the selected countries. The study also utilizes secondary sources, such as academic journals and books, to provide a broader understanding of the role of Islamic law in contemporary legal systems [19]–[21].

In terms of data analysis, the study adopts a thematic approach, categorizing findings into key themes such as the integration of *Sharia* in family law, its impact on criminal law, the role of Islamic courts and tribunals, and the challenges posed by the incorporation of Islamic principles in secular legal frameworks [22], [23].

Table 2. Research Method summary

Step	Description
Research Approach	Qualitative research with a comparative approach, focusing on Islamic law's role in the legal systems of various countries.
Data Collection	Data collected through literature review, legal document analysis, and case studies from selected countries (Saudi Arabia, Turkey, Indonesia, Pakistan, and the United Kingdom).
Analysis Method	Thematic analysis to categorize findings into key themes such as family law, criminal law, Islamic courts, and integration challenges.

RESULTS AND DISCUSSION

The study reveals that the role of Islamic law in contemporary legal systems is highly contextual and varies depending on each country's legal, cultural, and political environment.

Saudi Arabia

Saudi Arabia is one of the most prominent examples of a country where *Sharia* is the cornerstone of the entire legal system. In Saudi Arabia, there is no distinction between civil law and religious law, as Islamic law is fully integrated into every aspect of governance and daily life. The legal framework is based entirely on *Sharia*, which derives from the Quran and the Hadith (the sayings and practices of the Prophet Muhammad). Unlike many Western nations, which have codified legal systems with written constitutions and statutory laws, Saudi Arabia's legal system is not codified in a single written form. Instead, it relies on religious scholars and judges to interpret the principles of *Sharia* based on their understanding of Islamic texts. This lack of codification means that the application of the law is more flexible and can be subject to different interpretations, which can vary by region or the discretion of individual judges [24], [25].

Saudi courts base their decisions on Islamic legal texts, and cases related to civil, criminal, and family law are decided according to *Sharia* principles. For example, in criminal law, *Sharia* principles are applied to punishments for theft, adultery, apostasy, and murder, including corporal punishments such as flogging and amputation, or even the death penalty. In family law, *Sharia* governs issues like marriage, divorce, inheritance, and child custody, with a significant emphasis on traditional gender roles. Women, in particular, are subject to the legal framework's strict interpretation, which has historically placed them at a disadvantage in many legal proceedings. For instance, a woman's testimony in a court of law is often regarded as half that of a man, and she requires a male guardian's consent for significant decisions in her life, such as marriage [26], [27].

Furthermore, Saudi Arabia's legal system incorporates the religious police (the Committee for the Promotion of Virtue and the Prevention of Vice), which enforces Islamic moral and social norms. These enforcers are responsible for ensuring that citizens adhere to public decency laws and Islamic principles, such as prohibitions on public displays of affection, alcohol consumption, and adherence to dress codes. The religious police have historically held significant power to arrest individuals they believe are violating these laws, which has led to concerns about personal freedoms [28]–[30].

However, Saudi Arabia's strict interpretation of *Sharia* has sparked significant criticism, particularly from international human rights organizations. The country has faced accusations of human rights violations, including the treatment of women, religious minorities, and political dissidents. While there have been some reforms in recent years aimed at improving women's rights, such as granting women the right to drive and allowing greater participation in the workforce, many of the core legal restrictions that limit women's freedoms, such as the guardianship system, remain entrenched in the legal framework. Additionally, religious minorities, particularly Shia Muslims and non-Muslim expatriates, often face discrimination in the legal system. These groups have limited legal recourse for issues related to personal status, inheritance, and the freedom to practice their religion [31], [32].

In terms of international relations, Saudi Arabia's legal system has also faced scrutiny from other nations and international bodies. Its strict application of *Sharia* in legal and moral matters is often seen as incompatible with internationally recognized human rights standards, particularly regarding freedom of expression, gender equality, and the rights of religious minorities. Critics argue that Saudi Arabia's legal system, while deeply rooted in

Islamic tradition, does not provide sufficient protection for individual freedoms or align with modern human rights frameworks.

Despite these criticisms, the role of *Sharia* in Saudi Arabia's legal system remains central to the country's identity, and the government has shown little indication of significant legal reforms. In fact, *Sharia* continues to evolve in Saudi Arabia, especially in areas such as family law, where some adjustments have been made to increase women's legal rights. However, the pace of change is slow, and the legal system remains firmly grounded in its religious foundations, with *Sharia* law playing a decisive role in shaping both the personal and political lives of the citizens [33], [34].

Turkey

Turkey represents a unique example of a country where secularism is enshrined in its legal system, yet Islamic principles continue to influence societal norms and practices. The foundation of Turkey's legal system was laid in 1923 with the establishment of the Republic, under the leadership of Mustafa Kemal Atatürk, who introduced radical reforms aimed at modernizing and secularizing the country. Atatürk's vision of a secular republic sought to separate religious influence from governance, and this was formally codified in the constitution. As a result, Turkey's legal framework does not incorporate *Sharia* law in any formal capacity, and the judiciary operates based on civil law models inspired by European legal traditions, particularly the Swiss civil code [35], [36].

Despite this secular legal framework, Islamic principles continue to play a significant role in shaping the moral and cultural fabric of Turkish society. The majority of Turkey's population is Muslim, and Islamic values deeply influence public attitudes towards family life, social behavior, and ethics. Issues such as marriage, divorce, and inheritance are often influenced by traditional Islamic customs, even though these matters are governed by secular law. For example, while civil marriage is the only legally recognized form of marriage in Turkey, Islamic marriage ceremonies, or *nikah*, are still common and widely practiced, particularly in rural areas. Inheritance laws, although based on secular codes, may sometimes be informed by Islamic notions of equitable distribution of wealth among family members, and the Islamic concept of *mahr* (a marriage gift) may also come into play in private arrangements [37], [38].

Turkey's legal system, by maintaining a clear separation between religion and state, has at times created tensions between the state's secular identity and the Islamic beliefs of the population. While secularism was intended to modernize Turkey and position it as a Western-style democracy, the reality has been more complex. The deep-rooted Islamic values of the population have sometimes clashed with the secular policies imposed by the government, especially in matters relating to personal freedoms, education, and public life [39].

In recent years, these tensions have escalated due to political movements seeking to reintroduce Islamic elements into the public sphere. The Justice and Development Party (AKP), led by President Recep Tayyip Erdoğan, has played a pivotal role in shifting Turkey's political and social landscape. Under Erdoğan's leadership, there has been a noticeable increase in the prominence of Islamic values in government policy and social life. This includes the introduction of policies that have increased the visibility of religion in the public sphere, such as the easing of restrictions on wearing headscarves in state institutions and universities, as well as the introduction of religious courses in public schools. These changes have sparked significant debate and opposition from secularists, who fear that the country is moving away from its secular foundations and back toward a greater influence of *Sharia* or Islamic principles in governance [40], [41].

This shift has also affected the legal system. While Turkey's constitution remains secular, the growing role of political Islam in Turkish politics has led to a re-evaluation of the country's laws and their relationship to Islam. Some argue that the influence of Islamic values is beginning to reshape aspects of the legal system, particularly in areas such as family law, education, and the protection of religious freedoms. For instance, the increased prominence of religious schools, known as *imam hatip* schools, which provide an Islamic curriculum alongside secular education, has raised concerns about the balance between religious and secular education in the country [42]–[44].

Moreover, the political climate has created an environment where Islamic law and practices, while not formally incorporated into the state's legal structure, are being gradually normalized in the public sphere. This shift reflects broader debates about national identity, democracy, and religious freedom. Secularism, once viewed as a cornerstone of the Turkish Republic, is now seen by some as increasingly under threat, as political forces work to redefine the relationship between Islam and the state [45]–[47].

The evolving role of Islam in Turkey's legal and political landscape has also had an impact on Turkey's international relationships, especially its EU accession bid. Secularism has long been seen as a key element of Turkey's alignment with European norms, but the increasing influence of Islamic political movements has raised questions about Turkey's future as a member of the European Union, where secularism is deeply entrenched [48], [49].

In conclusion, while Turkey's legal system remains secular on paper, Islamic principles continue to exert influence, particularly in personal matters and social norms. The ongoing tension between secularism and political Islam highlights the complex and evolving nature of Turkey's legal system and its broader societal values. The country is at a crossroads, grappling with how to reconcile its historical commitment to secularism with the growing influence of Islamic ideologies in its political and legal spheres. This ongoing debate will likely shape Turkey's future as it navigates its unique position at the intersection of East and West, tradition and modernity.

Indonesia

Indonesia presents a distinctive example of a hybrid legal system, where *Sharia* law is selectively applied in certain regions, while the national legal framework remains secular. As the world's largest Muslim-majority country, Indonesia's legal system combines Islamic principles with civil law, striking a balance between religious law and modern governance. The country's legal system is largely based on civil law, inherited from the Dutch colonial period, and follows secular, democratic principles laid out in the Constitution. However, Islamic law is implemented in specific areas, particularly in the province of Aceh, which has been granted the autonomy to apply *Sharia* law in its jurisdiction since the signing of the Helsinki Peace Agreement in 2005, following years of conflict with the central government [50], [51].

In Aceh, *Sharia* law governs a variety of legal matters, including family law, criminal law, and even social behaviors, such as the enforcement of Islamic dress codes, the prohibition of alcohol, and regulations on public morality. The province has implemented *Sharia* courts that deal with cases related to marriage, inheritance, and Islamic offenses such as gambling, adultery, and the consumption of alcohol. These courts apply *Sharia* principles in adjudicating cases, offering a legal framework that aligns with the religious and cultural values of the majority Muslim population in Aceh. The legal code in Aceh also includes provisions for punishments such as public caning, a practice that is controversial both within Indonesia and internationally due to concerns over human rights and its perceived incompatibility with modern justice principles [52], [53].

However, despite the application of *Sharia* law in Aceh, it is crucial to note that *Sharia* does not override Indonesia's broader national laws, which remain secular. Indonesia's Constitution ensures that the national legal framework is based on civil law, with fundamental rights guaranteed to all citizens, irrespective of their religion. This means that while *Sharia* may govern personal and religious matters in Aceh, it does not have the authority to contradict national law, especially in areas such as criminal law, governance, and civil rights. National laws related to human rights, the protection of minorities, and freedom of expression still take precedence over regional implementations of *Sharia* [54], [55].

The coexistence of *Sharia* and secular law in Indonesia offers a unique model of legal pluralism, where Islamic law is applied selectively at the local level without undermining the broader national legal system. This hybrid system allows for localized applications of *Sharia* that reflect the values and practices of Muslim communities, particularly in Aceh, while preserving national unity and legal consistency across the entire country. This is crucial in a diverse nation like Indonesia, where the population comprises not only Muslims but also significant numbers of Christians, Hindus, and Buddhists, especially in regions like Bali and Papua [56].

The implementation of *Sharia* in Aceh is part of Indonesia's broader process of decentralization, which began in the early 2000s, granting greater autonomy to regional governments in a variety of areas, including law and governance. This decentralization is seen as a means of addressing regional disparities and promoting peace and stability, particularly in conflict-ridden areas like Aceh, where the conflict between separatists and the central government was partly fueled by tensions over the role of Islam in governance. The ability to implement *Sharia* law locally was one of the key provisions in the peace agreement that ended the conflict, which had lasted for decades [57]–[59].

Despite the localized application of *Sharia*, the hybrid legal system in Indonesia is not without controversy. Critics argue that the application of *Sharia* in Aceh could lead to the erosion of individual freedoms, particularly for women and religious minorities. For example, women in Aceh face restrictions on their personal dress and behavior, and there have been reports of women being punished by public caning for offenses such as adultery or premarital sex. While *Sharia* law in Aceh is designed to reflect the religious beliefs of the local population, its implementation has raised concerns about human rights, particularly regarding gender equality and freedom of religion. Some legal scholars and human rights advocates argue that these practices conflict with Indonesia's commitments to international human rights standards and the constitutional guarantees of equality before the law [60], [61].

Nevertheless, the Indonesian model of a hybrid legal system provides a valuable example of how Islamic law can coexist with secular law in a modern, pluralistic society. By allowing for *Sharia* law to be applied in specific regions, Indonesia maintains respect for the religious practices of its Muslim-majority population while ensuring that national laws continue to safeguard the rights of all citizens, regardless of their religion. This model offers flexibility, enabling local communities to integrate their cultural and religious values into their legal practices without sacrificing the country's overall commitment to secularism and national unity [62], [63].

In conclusion, Indonesia's approach to *Sharia* law is a unique blend of religious and secular principles, offering a case study in legal pluralism. The hybrid legal system reflects the country's commitment to accommodating its Muslim majority's religious practices while ensuring that the secular national framework upholds fundamental rights and freedoms. While the coexistence of *Sharia* and civil law in Indonesia presents challenges, it also provides a model of legal flexibility that seeks to balance tradition and modernity, religion and governance, in a diverse and multicultural society [64], [65].

Pakistan

Pakistan represents an example of a legal system where *Sharia* law has been incorporated into the national legal framework, particularly through the implementation of the *Hudood Ordinances*. Introduced in 1979 by the military regime of General Zia-ul-Haq, the *Hudood Ordinances* were a set of laws designed to enforce Islamic criminal law, based on *Sharia* principles, in Pakistan. These ordinances sought to bring the country's legal system in line with Islamic teachings by applying *Sharia* to a variety of criminal offenses, including theft, adultery, apostasy, and alcohol consumption. The *Hudood Ordinances* represented a significant shift in Pakistan's legal system, marking the formalization of Islamic criminal law and its application in everyday judicial processes. The ordinances were meant to reflect the regime's vision of Islamization and to promote what the government considered to be moral and Islamic values in public life [66]–[68].

The *Hudood Ordinances* specifically addressed several crimes under *Sharia*, including:

- Theft: Punishments for theft were brought into alignment with Islamic law, which prescribes harsh penalties, including amputation, under certain circumstances.
- Adultery: The ordinances introduced the concept of *zina* (fornication and adultery) as a criminal offense under *Sharia*. Those accused of adultery could be subject to severe punishments, such as stoning or flogging, depending on the evidence and circumstances.
- Apostasy: The *Hudood Ordinances* also addressed apostasy, or the renunciation of Islam, prescribing punishments for those who left the faith.
- Alcohol Consumption: The ordinances criminalized the consumption of alcohol, with punishments in line with *Sharia* law.

While the *Hudood Ordinances* were intended to establish a legal framework based on Islamic law, they have sparked intense and ongoing debate, particularly regarding their impact on women's rights. Critics argue that the ordinances disproportionately affect women, especially in cases of rape and adultery. Under the original provisions of the *Hudood Ordinances*, a woman who accused a man of rape had to provide four male witnesses to corroborate her testimony to secure a conviction. In the absence of such witnesses, the woman could be charged with adultery, a serious crime under *Sharia*, leading to possible prosecution and punishment, including the threat of stoning or flogging. This legal provision created significant barriers for women seeking justice in cases of rape, as it placed an overwhelming burden of proof on the victim, while perpetrators of rape often escaped punishment due to the difficulty of providing the required number of male witnesses [69], [70].

In addition to rape, women were also disproportionately affected by the laws concerning adultery. Under the *Hudood Ordinances*, a woman could be charged with the offense of *zina* if she engaged in sexual relations outside of marriage, even if those relations were non-consensual or coerced. This led to the situation where women who were victims of rape could sometimes be charged with adultery themselves. This was a significant source of injustice, as women were placed in a vulnerable position, unable to seek redress for their suffering. These legal shortcomings prompted widespread criticism from women's rights groups and international human rights organizations, which called for reforms to protect women's rights and ensure that *Sharia* was implemented in a manner consistent with modern principles of justice and human dignity [71], [72].

In response to the criticism and the concerns raised by human rights advocates, the *Hudood Ordinances* were partially revised in 2006 through the *Women's Protection Bill*, which sought to address some of the inequities in the original law. The bill made several

important changes, most notably easing the evidentiary requirements for prosecuting rape cases. It allowed for a conviction to be based on the victim's testimony or medical evidence, rather than requiring four male witnesses. This was a significant step toward improving women's access to justice, although many critics argue that the revisions did not go far enough in addressing the broader issues of gender inequality in Pakistan's legal system. The revisions also did not fully eliminate the discriminatory elements of the *Hudood Ordinances*, particularly in relation to cases of adultery and the legal status of women [73], [74].

Despite these challenges and criticisms, the *Hudood Ordinances* and their subsequent amendments reflect the significant role that Islamic law plays in shaping legal practices in Pakistan. The influence of *Sharia* in criminal law continues to be a deeply divisive issue, with some segments of society supporting the implementation of *Sharia* as an essential part of Pakistan's Islamic identity, while others advocate for legal reforms that align with international human rights standards and gender equality. The debate over the *Hudood Ordinances* underscores the complex relationship between Islamic law, secular legal principles, and human rights in Pakistan, particularly in the context of women's rights [75], [76].

Moreover, the ongoing debates about the role of *Sharia* in Pakistan's legal system reflect broader tensions within the country over the balance between religious values and modern legal norms. The *Hudood Ordinances* are part of a larger conversation about how Islamic law can be integrated into contemporary legal systems without infringing upon fundamental human rights. For some, the ordinances represent a necessary step in restoring the moral and ethical values of Islam to Pakistan's legal system, while for others, they symbolize a barrier to justice and equality, particularly for women and marginalized groups [77]–[79].

In conclusion, Pakistan's implementation of the *Hudood Ordinances* highlights the significant role of Islamic law in shaping the country's legal system, particularly in the criminal justice domain. The ordinances, while intended to align Pakistan's legal practices with *Sharia* principles, have had a controversial impact, particularly on women's rights. Despite the revisions made through the *Women's Protection Bill*, critics argue that further reforms are needed to ensure that Islamic law is applied in a way that upholds the principles of justice, equality, and human dignity. The legacy of the *Hudood Ordinances* continues to be felt today, as Pakistan grapples with the intersection of religion, law, and human rights [80]–[82].

United Kingdom

In the United Kingdom, Islamic law is not formally incorporated into the national legal system, as the UK operates under a common law system with a secular legal framework. However, Islamic law does play a role in certain personal matters through informal mechanisms such as arbitration and alternative dispute resolution (ADR). These mechanisms are used primarily by Muslim communities who wish to resolve personal disputes in a manner that aligns with their religious beliefs, particularly in areas such as marriage, divorce, and inheritance [83], [84].

The primary forum through which Islamic law is applied in the UK is through Islamic councils or Shariah tribunals. These are non-governmental bodies that provide a form of arbitration for Muslim individuals seeking to resolve disputes according to Islamic principles. The councils deal with various family law matters, including marriage and divorce, and issues related to financial matters such as inheritance. The decisions of these councils are not legally binding in the same way as court judgments, but they can be recognized as binding under the concept of religious arbitration, provided both parties voluntarily agree to submit their dispute to these bodies [85], [86].

One of the key areas where Islamic law plays a role is in marriage and divorce. For many Muslim couples in the UK, a religious marriage contract, or *Nikah*, is seen as just as important as a civil marriage, and they may seek a divorce through an Islamic tribunal, especially if they wish to resolve their situation according to Islamic teachings. In the case of divorce, *Sharia* principles typically require a mutual agreement or the payment of a *Mahr* (a dowry) by the husband to the wife. The tribunal may facilitate this process, ensuring that the divorce aligns with Islamic practices, while also considering the civil legal implications of the divorce, such as child custody and division of property [87], [88].

In the area of inheritance, Islamic law also plays a significant role. According to *Sharia*, the inheritance system dictates how the deceased's estate should be distributed among family members, with specific shares designated for children, spouses, and other relatives. While the UK legal system does not automatically enforce *Sharia* law regarding inheritance, Islamic tribunals can assist in ensuring that the distribution of assets adheres to Islamic principles, provided it does not conflict with UK law [89], [90].

Despite the voluntary nature of these tribunals and the fact that they do not have formal legal authority in the UK, their presence and growing influence have raised significant concerns, particularly in the area of women's rights. Critics argue that there are potential risks associated with informal *Sharia* arbitration, especially in cases of divorce. For instance, women may be pressured into accepting unfair terms in divorce settlements, or they may have limited recourse if they feel the tribunal's decision is unjust. This concern is heightened by the fact that some argue that these informal tribunals may not always operate in line with broader human rights standards, especially when it comes to gender equality [91].

A particular point of contention is the way in which women's rights are handled in *Sharia* divorce proceedings. Under traditional interpretations of Islamic law, women may face disadvantages, particularly regarding the rights to custody of children, financial support, and the right to initiate divorce. In some cases, the husband's ability to unilaterally divorce his wife (through a practice known as *Talaq*) has raised concerns about the potential for abuse. Some women, particularly those in abusive relationships, may find themselves trapped in marriages due to the limited legal options available through informal *Sharia* processes. Although the UK courts generally ensure that civil law principles, including provisions for the protection of women, are upheld, there have been cases where women feel that the informal nature of *Sharia* tribunals leaves them vulnerable to discrimination or exploitation [92], [93].

Additionally, some have expressed concern about the lack of oversight and accountability within *Sharia* tribunals. Unlike the formal legal system, which is bound by strict guidelines, oversight procedures, and checks on fairness, the informal *Sharia* tribunals do not have the same level of regulation or scrutiny. This lack of formal regulation can lead to inconsistencies in the way decisions are made, potentially exacerbating issues of fairness and equal treatment. For instance, some Muslim women in the UK have reported that *Sharia* councils have not always provided fair rulings on issues like child custody or alimony, which have led to public debates about the role of these tribunals in ensuring equality before the law [94], [95].

Despite these concerns, supporters of the use of *Sharia* in the UK argue that it provides a culturally appropriate and accessible means for Muslim communities to resolve disputes in a way that aligns with their faith. They contend that these tribunals offer an alternative to a lengthy and costly legal process, allowing for resolution in a way that respects religious beliefs and practices. Furthermore, proponents emphasize that the decisions made by *Sharia* councils are not legally binding in the UK, and individuals are free to seek recourse through the formal judicial system if they feel that their rights have been violated [96]–[98].

In response to growing concerns about the functioning of *Sharia* tribunals, there have been calls for increased oversight and regulation to ensure that the principles of fairness, equality, and justice are upheld. Some have suggested that *Sharia* arbitration should be required to operate in alignment with UK law, particularly in areas like women’s rights and equality, to prevent discriminatory practices. There is also an ongoing debate regarding the balance between respecting religious autonomy and protecting individuals from practices that may undermine fundamental human rights, such as gender equality [99], [100].

In conclusion, while Islamic law is applied informally in the UK through arbitration and alternative dispute resolution mechanisms, the practice raises significant concerns regarding its potential for discrimination, particularly in the realm of women’s rights. The use of *Sharia* councils to resolve personal disputes like marriage and divorce provides a culturally relevant option for Muslim communities, but the lack of formal regulation and oversight has led to debates about fairness, accountability, and the protection of rights within these tribunals. As the discussion continues, it will be important to find a balance that respects religious practices while ensuring that legal frameworks protect fundamental human rights and equality for all citizens [101], [102].

These results highlight the complex relationship between Islamic law and secular legal systems. While Islamic law influences legal practices, its integration into formal legal systems is not straightforward, and it presents challenges in ensuring compatibility with universal human rights standards, particularly regarding gender equality and individual freedoms.

Table 3. Integration of Sharia in Comparative Legal Systems: Challenges and Prospects for Reform

Country	Sharia Integration	Legal System Characteristics	Key Legal Areas Affected	Challenges/Concerns	Potential for Reform
Saudi Arabia	Fully integrated; Sharia is the foundation of the legal system.	No codified national law; all legal matters are decided based on Sharia principles.	Criminal law (e.g., corporal punishment), family law, and contracts.	Human rights violations, especially concerning women's rights and religious minorities.	Slow adaptation to modern human rights standards; limited reforms to protect women's rights.
Turkey	Sharia influences societal norms but is not incorporated into formal law.	Secular legal system with a history of conflict between secularism and Islamic values.	Social norms and family law, particularly marriage and divorce.	Tensions between secularism and Islamic values, particularly in political and social spheres.	Debates over the role of Islam in governance and the increasing influence of Islamic values in public policy.
Indonesia	Sharia is applied in	Hybrid system: Sharia coexists	Family law, criminal	Discriminatory practices,	Legal pluralism

	specific regions (e.g., Aceh) but does not override national secular law.	with civil law in specific regions, offering flexibility while maintaining national unity.	justice, and public morality in Aceh province.	particularly towards women, and inconsistent application of Sharia in Aceh.	can allow for flexibility, but there is potential for greater oversight in Sharia applications.
Pakistan	Sharia is integrated into criminal law via the Hudood Ordinances, affecting family law and criminal matters.	A combination of Sharia and British colonial law; concerns over gender equality, especially in criminal cases.	Criminal law, family law, and particularly women's rights in divorce and inheritance.	Discrimination against women, particularly in cases of rape and adultery, under the Hudood Ordinances.	Reforms (e.g., Women's Protection Bill) have been introduced, but more progress is needed to ensure gender equality.
United Kingdom	Sharia is applied informally through arbitration and dispute resolution mechanisms within Muslim communities.	Secular legal system with informal application of Sharia in personal disputes, especially in marriage and divorce.	Marriage, divorce, inheritance, and financial disputes within the Muslim community.	Lack of oversight and potential for discrimination in informal Sharia arbitration, especially regarding women's rights.	There is a need for more regulation and oversight in Sharia arbitration to ensure fairness and protect human rights.

CONCLUSION

In conclusion, this research highlights the complex and multifaceted role of Islamic law (*Sharia*) within contemporary legal systems, particularly in relation to secular frameworks. By examining the integration of *Sharia* in Saudi Arabia, Turkey, Indonesia, Pakistan, and the United Kingdom, this study sheds light on the diverse ways in which Islamic law influences family law, criminal justice, and dispute resolution. The findings underscore the importance of understanding the balance between religious principles and human rights, particularly in countries with legal pluralism. This research reaffirms the thesis that while *Sharia* law poses challenges in terms of gender equality and human rights, it can coexist with secular legal frameworks if applied thoughtfully and with appropriate safeguards. The implications of this study are far-reaching. It offers insights for policymakers, legal practitioners, and human rights advocates to better navigate the intersections of religious and secular law, ensuring that fundamental rights, such as gender equality and personal freedoms, are upheld. Furthermore, the research calls for greater dialogue and legal reform, particularly in areas where the application of *Sharia* could undermine individual rights, especially for women and religious minorities. Future research could explore the evolving role of Islamic law in emerging legal systems or investigate the impact of *Sharia* in areas such as economic law, governance, or international relations. Additionally, a deeper

exploration of the informal application of *Sharia*, especially in secular democracies, could provide a more comprehensive understanding of its influence and potential for reform. The ongoing integration of religious law in modern legal systems presents both challenges and opportunities for the future of global legal practices, and further investigation will be crucial for promoting justice and equality in diverse legal landscapes.

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Author Contribution

All authors contributed equally to the conception, design, and writing of this article. The research involved shared efforts in literature review, data collection, and analysis of legal pluralism in contemporary systems. Draft preparation, revisions, and final approval of the manuscript were carried out jointly to ensure academic accuracy and balance.

Conflicts of Interest

The authors declare that there are no conflicts of interest regarding the publication of this article. The research was conducted solely for academic purposes and is independent of any political, financial, or institutional influence.

REFERENCES

- [1] U. Schmid, "Legal pluralism as a source of conflict in multi-ethnic societies: The case of Ghana," *J. Leg. Plur. Unoff. Law*, vol. 33, no. 46, pp. 1-47, 2001, <https://doi.org/10.1080/07329113.2001.10756551>.
- [2] B. J. Berkmann, "Catholic church law: Challenges by secular law and religious pluralism," *Interdiscip. J. Relig. Transform. Contemp. Soc.*, vol. 7, no. 1, pp. 95-124, 2021, <https://doi.org/10.30965/23642807-bja10009>.
- [3] B. Ashirbayev, N. Kuantayev, B. Tolepbergen, A. Shegebayev, and A. Duisenbi, "Legal Foundations and Social Responsibility of Freedom of Speech in Kazakhstan," *Int. J. Semiot. Law*, 2024, <https://doi.org/10.1007/s11196-024-10136-0>.
- [4] A. W. A. Muhaimin, "The Actualization of *Sharia* and *Fiqh* in Resolving Various Legal Issues," *Ahkam J. Ilmu Syariah*, vol. 15, no. 2, pp. 241-248, 2015, <https://doi.org/10.15408/ajis.v15i2.2868>.
- [5] "Subhat Income of *Sharia* Financial Institutions According to Dual Law (Formal and *Sharia* Law)," *Ahkam J. Ilmu Syariah*, vol. 19, no. 2, pp. 411-428, 2019, <https://doi.org/10.15408/ajis.v19i2.12982>.
- [6] D. Sartono, M. Mahmudhassan, I. Najmi, S. Amin, and M. Bensar, "Silver as Nishab Zakat to Improve Community Welfare in the Modern Era," *Demak Univers. J. Islam Sharia*, vol. 1, no. 02, pp. 83-91, Oct. 2023, <https://doi.org/10.61455/deujis.v1i02.24>.
- [7] N. Nuha *et al.*, "The Existence of Education as a Rehabilitation, Preventive, Curative, and Moral Development Strategy in Madrasah," *Solo Univers. J. Islam. Educ. Multicult.*, vol. 2, no. 01, pp. 01-18, Mar. 2024, <https://doi.org/10.61455/sujjem.v2i01.99>.
- [8] I. Afiyah and M. Mahmudhassan, "Professional Zakat as a Catalyst for Welfare: Strategic Mapping for Sustainable Economic Growth in Semarang," *Demak Univers. J. Islam Sharia*, vol. 2, no. 03, pp. 199-210, Apr. 2024, <https://doi.org/10.61455/deujis.v2i03.129>.
- [9] M. Mahmudhassan, M. Abuzar, S. U. A. Khondoker, and J. Khanom, "The Integration of Islamic Epistemology in Ethical and Multicultural Education: Pedagogical Strategies and Challenges," *Multicult. Islam. Educ. Rev.*, vol. 2, no. 2, Feb. 2025, <https://doi.org/10.23917/mier.v2i2.7612>.
- [10] M. M. A. Sholeh, Waston, A. Nirwana, and M. Mahmudhassan, "The Reasons of Lifelong Education for the Sustainable Development Goals (SDGs): The Islamic Epistemology Perspective," *J. Lifestyle SDGs Rev.*, vol. 5, no. 2, p. e02988, Nov. 2024, <https://doi.org/10.47172/2965-730X.SDGsReview.v5.n02.pe02988>.

- [11] I. Afiyah, V. Ghafurjonovich Maksudov, M. Mahmudulhassan, and M. Muthoifin, "Impact Analysis of Marital Dispensation: Economic Implications and Family Welfare in Social and Legal Context," *Solo Int. Collab. Publ. Soc. Sci. Humanit.*, vol. 2, no. 01, pp. 25–36, Mar. 2024, <https://doi.org/10.61455/sicopus.v2i01.117>.
- [12] M. Al-Rasheed, "Caught between religion and state: Women in Saudi Arabia," in *Saudi Arabia in Transition: Insights on Social, Political, Economic and Religious Change*, Cambridge University Press, 2015, pp. 292–313. <https://doi.org/10.1017/CBO9781139047586.018>.
- [13] H. Yavuz and K. van den Bos, "Effects of uncertainty and mortality salience on worldview defense reactions in Turkey," *Soc. Justice Res.*, vol. 22, no. 4, pp. 384–398, 2009, <https://doi.org/10.1007/s11211-009-0104-5>.
- [14] A. D. Luthfia and A. History, "Navigating Compliant Agency in Cyberspace : Muslim Womanhood Through the Lens of Oki Setiana Dewi," vol. 20, no. 2, pp. 240–257, 2024.
- [15] M. Nawfal and C. Çandar, "Turkish foreign minister Ahmet Davutoğlu: New Arab legitimacy or regional cold war?," *J. Palest. Stud.*, vol. 42, no. 3, pp. 92–102, 2013, <https://doi.org/10.1525/jps.2013.42.3.92>.
- [16] O. Shafey, E. Fernández, M. Thun, A. Schiaffino, S. Dolwick, and V. Cokkinides, "Cigarette Advertising and Female Smoking Prevalence in Spain, 1982-1997: Case Studies in International Tobacco Surveillance," *Cancer*, vol. 100, no. 8, pp. 1744–1749, 2004, <https://doi.org/10.1002/cncr.20147>.
- [17] A. Lister, "The 'Mirage' of Social Justice: Hayek Against (and For) Rawls," *Crit. Rev.*, vol. 25, no. 3–4, pp. 409–444, 2013, <https://doi.org/10.1080/08913811.2013.853859>.
- [18] B. S. Hass, "The hybrid researcher: Entering the field, ethnography and research among dutch muslim women from 2009 to 2019," *Religions*, vol. 12, no. 4, 2021, <https://doi.org/10.3390/rel12040278>.
- [19] M. Abuzar and H. S. Mansoor, "Exploring The Role Of Hijab In Fostering Personal Security And Positive Body Image: A Cross-Cultural Analysis Of Indonesian And Pakistani Women's Perspectives," *J. Indones. Islam*, vol. 18, no. 1, p. 206, Jun. 2024, <https://doi.org/10.15642/IIIS.2024.18.1.206-224>.
- [20] M. Abuzar, Mahmudulhassan, and L. Nuryanti, "The Role Of Online Social Network Sites And Social Integration In Mitigating Homesickness Among International Students," *Pakistan J. Educ. Res.*, vol. 7, no. 3, pp. 95–112, 2024, <https://doi.org/10.52337/pjer.v7i3.1151>.
- [21] M. Abuzar and E. Purwandari, "Self-Esteem Matters: Examining its Impact on Academic Achievement in the Context of Gender and Age Diversity in Higher Education," *Indones. J. Soc. Res.*, vol. 6, no. 2, p. 156, Aug. 2024, <https://doi.org/10.30997/ijsr.v6i2.473>.
- [22] M. Waston, Yusuf Olawale Owa-Onire Uthman, Mahmudulhassan, "Ian G. Barbour's Thoughts on Science and Religion," *J. World Thinkers*, vol. 1, no. 1, pp. 1–16, 2024.
- [23] S. Rahmawati, F. Qurrota, and A. Tamami, "The Integration of Faith and National Identity: A Comprehensive Study on Islamic Patriotism and Its Theological Implications," *Solo Univers. J. Islam. Educ. Multicult.*, vol. 2, no. 2, pp. 83–92, 2024, <https://doi.org/10.61455/sujjem.v2i02.185>.
- [24] A. Singh, "Status of Women in Saudi Arabia: A Paradigm Shift," *Int. J. Interdiscip. Soc. Sci. Annu. Rev.*, vol. 3, no. 5, pp. 35–38, 2008, <https://doi.org/10.18848/1833-1882/CGP/v03i05/52598>.
- [25] M. A. Al Sheef, M. S. Al Sharqi, L. H. Al Sharief, T. Y. Takrouni, and A. M. Mian, "Awareness of do-not-resuscitate orders in the outpatient setting in Saudi Arabia," *Saudi Med. J.*, vol. 38, no. 3, pp. 297–301, Mar. 2017, <https://doi.org/10.15537/smj.2017.3.18063>.
- [26] Mahmudulhassan, A. Nirwana, and K. Saif Uddin Ahmed, "Exploring the Contributions of Prof. Dr. Syed Ali Ashraf to the Islamization of Knowledge in Bangladesh: A Comprehensive Analysis," *J. World Thinkers*, vol. 1, no. 1, pp. 91–98, 2024.
- [27] M. Abuzar and A. Nirwana, "Night Work Culture in Professional and Sharia Perspectives," *Solo Int. Collab. Publ. Soc. Sci. Humanit.*, vol. 2, no. 3, pp. 268–281, 2024, <https://doi.org/10.61455/sicopus.v2i03.198>.
- [28] Y. T. Muryanto, D. B. Kharisma, and A. S. Ciptorukmi Nugraheni, "Prospects and challenges of Islamic fintech in Indonesia: a legal viewpoint," *Int. J. Law Manag.*, vol. 64, no. 2, pp. 239–252, 2022, <https://doi.org/10.1108/IJLMA-07-2021-0162>.
- [29] A. A. Darem, A. A. Alhashmi, T. M. Alkhalidi, A. M. Alashjaec, S. M. Alanazi, and S. A. Ebad, "Cyber Threats Classifications and Countermeasures in Banking and Financial Sector," *IEEE Access*, vol. 11, pp. 125138–125158, 2023, <https://doi.org/10.1109/ACCESS.2023.3327016>.
- [30] H. A. Alotaibi, "The challenges of execution of Islamic criminal law in developing Muslim Countries: An analysis based on Islamic principles and existing legal system," *Cogent Soc. Sci.*, vol. 7, no. 1, 2021,

<https://doi.org/10.1080/23311886.2021.1925413>.

- [31] U. Anaria, "Analogy Interpretation for Renewal Criminal Justice in Indonesia," *Leg. J. Ilm. Huk.*, vol. 28, no. 1, pp. 70–80, 2020, <https://doi.org/10.22219/ljih.v28i1.10604>.
- [32] N. Kalbuana *et al.*, "Interpretation of Sharia Accounting Practices in Indonesia," *J. Leg. Ethical Regul. Issues*, vol. 24, pp. 1–12, 2021, <https://doi.org/10.55047/cashflow.v2i1.383>.
- [33] M. Abuzar, S. Uddin, and A. Khondoker, "Exploring the Dynamics of Student Motivation and Behavior: A Qualitative Analysis of Influencing Factors and Effective Interventions," *Solo Univers. J. Islam. Educ. Multicult.*, vol. 2, no. 3, pp. 195–206, 2024, <https://doi.org/10.61455/sujiem.v2i03.202>.
- [34] J. Khanom, M. T. Islam, and Mahmudhassan, "Women's Rights in Islamic Culture: A Bibliometric Analysis of Trends, Influential Authors, and Institutional Contributions (1969–2023)," *Solo Univers. J. Islam. Educ. Multicult.*, vol. 3, no. 01, pp. 27–42, Dec. 2024, <https://doi.org/10.61455/sujiem.v3i01.232>.
- [35] A. S. İkiz, "Cryptocurrencies in Turkey; Facts, Figures and Trends," in *Studies in Computational Intelligence*, vol. 1010, Y. S.G., Ed., Faculty of Economics and Administrative Studies, Muğla Sıtkı Koçman University, Muğla, Turkey: Springer Science and Business Media Deutschland GmbH, 2022, pp. 567–572. https://doi.org/10.1007/978-3-031-05258-3_45.
- [36] T. Bayar, "Turkey's withdrawal from Istanbul Convention: international human rights regime vis-à-vis authoritarian survival," *Turkish Stud.*, vol. 25, no. 1, pp. 22–42, Jan. 2024, <https://doi.org/10.1080/14683849.2023.2262721>.
- [37] I. Holmes, "2 - Public Meets Private: Sustainable Finance for a Sustainable Economy," in *Making the Financial System Sustainable*, Hermes Investment Management, United Kingdom: Cambridge University Press, 2020, pp. 26–48. <https://doi.org/10.1017/9781108908269.005>.
- [38] J. Ryan-Collins, "Private Landed Property and Finance: A Checkered History," *Am. J. Econ. Sociol.*, vol. 80, no. 2, pp. 465–502, 2021, <https://doi.org/10.1111/ajes.12387>.
- [39] G. Barton, I. Yilmaz, and N. Morieson, "Authoritarianism, democracy, Islamic movements and contestations of Islamic religious ideas in Indonesia," *Religions*, vol. 12, no. 8, pp. 1–20, 2021, <https://doi.org/10.3390/rel12080641>.
- [40] A. Faizin, A. Mansur, and A. M. Abdullah, "Islam, Human Rights, and AKP (Adalet ve Kalkınma Partisi) in Turkey," *Ahkam J. Ilmu Syariah*, vol. 21, no. 2, pp. 279–298, 2021.
- [41] D. Lüküslü, "Creating a pious generation: youth and education policies of the AKP in Turkey," *J. Southeast Eur. Black Sea*, vol. 16, no. 4, pp. 637–649, 2016, <https://doi.org/10.1080/14683857.2016.1243332>.
- [42] D. Morris, "Sacred space and secular concern in the photography of tyagan miller," *Vis. Commun. Q.*, vol. 13, no. 4, pp. 224–239, 2006, https://doi.org/10.1207/s15551407vcq1304_3.
- [43] D. Latif, "Beyond secular? AKP's religious policies and societal polarization in North Cyprus," *Turkish Stud.*, vol. 22, no. 5, pp. 801–823, 2021, <https://doi.org/10.1080/14683849.2020.1858813>.
- [44] P. Montero, "Religious School Education in Brazilian Supreme Federal Court Voting," *Secul. Stud.*, vol. 5, no. 2, pp. 120–139, 2023, <https://doi.org/10.1163/25892525-bja10048>.
- [45] Muthoifin and A. H. Anfas, "Optimizing the Potential of Zakat to Alleviate Poverty Problems and Improve Community Economy in Surakarta City," *J. Ecohumanism*, vol. 3, no. 3, pp. 121–127, 2024, <https://doi.org/10.62754/joe.v3i3.3394>.
- [46] M., Q. Q. Yusran, . M., . N., . W., and A. Nirwana, "The Practice of Changing the Status of Change of Waqf Property in the Islamic Social Economic View," *J. Ecohumanism*, vol. 3, no. 6, pp. 229–238, 2024, <https://doi.org/10.62754/joe.v3i6.3996>.
- [47] Muthoifin, I. Afiyah, and Nuha, "Behavioral responses of cows and goats during slaughtering for Eid Al-Adha: A field study in Surakarta," *J. Anim. Behav. Biometeorol.*, vol. 12, no. 4, 2024, <https://doi.org/10.31893/jabb.2024034>.
- [48] R. Cippitani, "Ethical issues and law-making power: how European case law has rewritten Italian law on medically assisted reproduction," *Monash Bioeth. Rev.*, vol. 37, no. 1–2, pp. 46–67, 2019, <https://doi.org/10.1007/s40592-018-0088-8>.
- [49] M. Jesse, *European Societies, Migration, And The Law: The 'Others' amongst 'Us.'* European Union Law, University of Leiden, Netherlands: Cambridge University Press, 2020. <https://doi.org/10.1017/9781108767637>.
- [50] H. Wai Weng, "Packaging, Persuasion and Propaganda: Popular Preaching and Islamic Counter-publics

- in Indonesia,” *Asian Stud. Rev.*, vol. 48, no. 1, pp. 70–85, 2024, <https://doi.org/10.1080/10357823.2022.2052801>.
- [51] T. Kaartinen, “Islamic transformations in the periphery of Maluku, Indonesia,” *Indones. Malay World*, vol. 47, no. 138, pp. 184–198, 2019, <https://doi.org/10.1080/13639811.2019.1583428>.
- [52] A. Sodiqin and R. R. Umroh, “Towards An Interreligious Fiqh: A Study of the Culture-Based Religious Tolerance in the Kaloran Community, Central Java, Indonesia,” *Al-Jami’ah*, vol. 61, no. 1, pp. 159–180, 2023, <https://doi.org/10.14421/ajis.2023.611.159-180>.
- [53] D. Fossati, E. Aspinall, B. Muhtadi, and E. Warburton, “Ideological representation in clientelistic democracies: The Indonesian case,” *Elect. Stud.*, vol. 63, 2020, <https://doi.org/10.1016/j.electstud.2019.102111>.
- [54] T. Faturhman and I. Hassandi, “User Acceptance Of Online Waqf Applications: Evidence From Indonesia,” *J. Islam. Monet. Econ. Financ.*, vol. 6, no. 3, pp. 503–530, 2020, <https://doi.org/10.21098/jimf.v6i3.1117>.
- [55] I. Freckelton QC, “Blasphemy law, mental illness and the potential for injustice: a cautionary tale from Indonesia,” *Psychiatry, Psychol. Law*, vol. 27, no. 2, pp. 169–180, 2020, <https://doi.org/10.1080/13218719.2020.1736392>.
- [56] N. M. Arshiniwati and I. B. G. Surya Peradantha, “Reviving the Sanghyang Grodog Ritual Dance: Promoting Social Harmony and Sustainable Cultural Tourism in Nusa Lembongan Island, Bali,” *J. Kaji Bali*, vol. 15, no. 1, pp. 61–91, 2025, <https://doi.org/10.24843/JKB.2025.v15.i01.p03>.
- [57] P. R. N. Hakim, I. Abdullah, M. R. Musfiroh, S. Sintang, and A. S. Razick, “Contesting Sharia and Human Rights in the Digital Sphere: Media Representations of the Caning Controversy under the Qanun Jinayat in Aceh,” *J. Islam. Law*, vol. 6, no. 2, pp. 206–235, 2025, <https://doi.org/10.24260/jil.v6i2.3600>.
- [58] “Islam, Fatwa dan Negara: Meretas Pluralisme Hukum Perceraian di Aceh,” *Al-Manahij J. Kaji. Huk. Islam*, vol. 15, no. 2, pp. 233–248, 2021, <https://doi.org/10.24090/mnh.v15i2.5150>.
- [59] T. Tahlil, R. J. Woodman, J. Coveney, and P. R. Ward, “Six-month follow-up of a cluster randomized trial of school-based smoking prevention education programs in Aceh, Indonesia,” *BMC Public Health*, vol. 15, no. 1, 2015, <https://doi.org/10.1186/s12889-015-2428-4>.
- [60] R. M. Feener, “Engineering transformations in the ‘religion-development nexus’: Islamic law, reform, and reconstruction in Aceh,” *Religion*, vol. 51, no. 1, pp. 40–57, 2021, <https://doi.org/10.1080/0048721X.2020.1792051>.
- [61] Junaidi, Afrinaldi, F. S. Artika, M. O. Almomani, and H. Hulwana, “Islamic Moderatism in Curriculum Development Of Islamic Educational Institutions in Aceh,” *J. Pendidik. Agama Islam*, vol. 22, no. 1, pp. 43–56, 2025, <https://doi.org/10.14421/jpai.v22i1.8313>.
- [62] M. Sulistyati, “Locality, Equality, and Piety: Pesantren Ecofeminism Movement in Indonesia,” *Stud. Islam*, vol. 30, no. 2, pp. 319–347, 2023, <https://doi.org/10.36712/SDI.V30I2.25175>.
- [63] I. Abdullah, J. Hasse, S. Z. Qudsy, M. Pabbajah, and Z. H. Prasajo, “The Use and Abuse of Internet Spaces: Fitna, Desacralization, and Conflict in Indonesia’s Virtual Reality,” *Cosmop. Civ. Soc.*, vol. 16, no. 3, pp. 1–12, 2024, <https://doi.org/10.5130/ccs.v16.i3.8962>.
- [64] M. Jannah, “The implementation of character education on the tarbiyah and teachers training faculty at the state Islamic University Indonesia (morality reinforcement approach),” *Int. J. Innov. Creat. Chang*, vol. 12, no. 12, pp. 1–24, 2020.
- [65] R. W. Hefner, “Whatever Happened to Civil Islam? Islam and Democratisation in Indonesia, 20 Years On,” *Asian Stud. Rev.*, vol. 43, no. 3, pp. 375–396, 2019, <https://doi.org/10.1080/10357823.2019.1625865>.
- [66] Q. Jan, S. Ullah, B. U. Haq, and Y. Xie, “Religion, politics and science education in Pakistan: Analysis of Islamisation of science textbooks in tribal districts,” *HTS Teol. Stud. / Theol. Stud.*, vol. 79, no. 1, 2023, <https://doi.org/10.4102/hts.v79i1.8151>.
- [67] A. Khurshid, “Domesticated gender (in) equality: Women’s education & gender relations among rural communities in Pakistan,” *Int. J. Educ. Dev.*, vol. 51, pp. 43–50, 2016, <https://doi.org/10.1016/j.ijedudev.2016.08.001>.
- [68] E. Mujahid-Mukhtar and H. Mukhtar, “Female participation in household decision-making: an analysis of consumer durables’ acquisition in Pakistan,” *Pak. Dev. Rev.*, vol. 30, no. 4 Pt 2, pp. 953–962, 1991.
- [69] O. Verkaaik, *Migrants and Militants: Fun And Urban Violence In Pakistan*. Research Center for Religion and Society, University of Amsterdam, Netherlands: Princeton University Press, 2018,
-

<https://doi.org/10.2307/j.ctv2tvzrj>.

- [70] D. M. Carbonu and J. M. Soares, “Forensic nursing in Pakistan: Bridging the gap between victimized women and health care delivery systems,” *J. Psychosoc. Nurs. Ment. Health Serv.*, vol. 35, no. 6, pp. 19–27, 1997, <https://doi.org/10.3928/0279-3695-19970601-18>.
- [71] J. Chacko, “In the Province of Faith: Disaggregating Pakistani Religious Parties’ Electoral Performance at the Sub-national and Denominational Levels,” *Rev. Faith Int. Aff.*, vol. 21, no. 3, pp. 103–123, 2023, <https://doi.org/10.1080/15570274.2023.2235807>.
- [72] K. J. Krotki, “Reported masculinity ratio in Pakistan: a triumph of anthropology and economics over biology,” *Pak. Dev. Rev.*, vol. 24, no. 3–4, pp. 267–303, 1985, <https://doi.org/10.30541/v24i3-4pp.267-303>.
- [73] B. Riaz, “Win the battle, lose the war?: Strategies for repealing the zina ordinance in Pakistan,” *Muslim World J. Hum. Rights*, vol. 17, no. 1, pp. 89–103, 2020, <https://doi.org/10.1515/mwjhr-2020-0009>.
- [74] C. Mohomed, “Becoming Modern and Secular: A Review Essay on Recent Work on Islam and South Asia,” *J. Law Relig.*, vol. 39, no. 2, pp. 270–284, May 2024, <https://doi.org/10.1017/jlr.2024.11>.
- [75] I. Mačernytė-Panomariovienė, M. Erikson, and T. Wrocławska, “Protection of Women’s Rights in Lithuania, Estonia and Poland: In Search of Balance Between Work and Family Life,” in *European Union and Its Neighbours in a Globalized World*, vol. 8, Law Institute, Lithuanian Centre for Social Sciences, Vilnius, Lithuania: Springer Nature, 2022, pp. 107–136. https://doi.org/10.1007/978-3-031-06998-7_5.
- [76] M. Mahmudulhassan, W. Waston, and A. Nirwana AN, “The Rights and Status of Widows in Islam: A Study from the Perspective of Multicultural Islamic Education in the Context of Bangladesh,” *Multicult. Islam. Educ. Rev.*, vol. 1, no. 1, pp. 01–14, Sep. 2023, <https://doi.org/10.23917/mier.v1i1.2674>.
- [77] W. Waston, A. Nirwana, S. Amini, M. M. A. Sholeh, and M. Muthoifin, “A moral-based curriculum to improve civilization and human resource development in Bangladesh,” *Multidiscip. Rev.*, vol. 7, no. 8, 2024, <https://doi.org/10.31893/multirev.2024137>.
- [78] G. Popovska and F. Popovski, “The Teachers’ Role in Developing Students’ Moral and Ethical Values,” *Pedagogika-Pedagogy*, no. February 2021, <https://doi.org/10.53656/ped2021-1.08>.
- [79] Muhammad Abuzar, Mahmudulhassan, and Saif Uddin Ahmed Khondoker, “Ethical Curriculum Development: Insights From Islamic Epistemology Towards Sustainable Development Goals (SDGs),” *Profetika J. Stud. Islam*, vol. 25, no. 02, pp. 273–286, Jan. 2025, <https://doi.org/10.23917/profetika.v25i02.7306>.
- [80] E. Polymenopoulou, “Sharia and Human Rights Law in the Constitutional Framework of Gulf States,” *Hum. Rights Q.*, vol. 46, no. 1, pp. 1–24, 2024, <https://doi.org/10.1353/hrq.2024.a918538>.
- [81] M. Vatter, “Dignity and the Foundation of Human Rights: Toward an Averroist Genealogy,” *Polit. Relig.*, vol. 13, no. 2, pp. 304–332, 2020, <https://doi.org/10.1017/S1755048319000336>.
- [82] G. Evolvi and M. Gatti, “Proselytism and ostentation: A critical discourse analysis of the European court of human rights’ case law on religious symbols,” *J. Relig. Eur.*, vol. 14, no. 1–2, pp. 162–188, 2021, <https://doi.org/10.1163/18748929-20211524>.
- [83] D. Oldroyd, R. K. Fleischman, and T. N. Tyson, “The culpability of accounting practice in promoting slavery in the British Empire and antebellum United States,” *Crit. Perspect. Account.*, vol. 19, no. 5, pp. 764–784, 2008, <https://doi.org/10.1016/j.cpa.2006.11.005>.
- [84] M. D. Friedlander, “Adjudicating in the kingdom of ends: A constructivist response to the Hart/Dworkin debate,” *Univ. Ill. Law Rev.*, vol. 2011, no. 4, pp. 1387–1418, 2011.
- [85] E. Magli, M. Mazzei, O. Biosca, and N. McHugh, “Exploring ‘Alternatives’ in the Consumer Credit Market: Community Development Finance Institutions in the United Kingdom,” *Tijdschr. voor Econ. en Soc. Geogr.*, 2024, <https://doi.org/10.1111/tesg.12640>.
- [86] Y. Egorova, “Common difference: Conceptualising simultaneity and racial sincerity in Jewish-Muslim relations in the United Kingdom,” *Anthropol. Theory*, vol. 24, no. 1, pp. 67–87, 2024, <https://doi.org/10.1177/14634996231179520>.
- [87] R. Gillard, C. Snell, and M. Bevan, “Advancing an energy justice perspective of fuel poverty: Household vulnerability and domestic retrofit policy in the United Kingdom,” *Energy Res. Soc. Sci.*, vol. 29, pp. 53–61, 2017, <https://doi.org/10.1016/j.erss.2017.05.012>.
- [88] M. A. Bracke, “Women’s Rights, Family Planning, and Population Control: The Emergence of Reproductive Rights in the United Nations (1960s–70s),” *Int. Hist. Rev.*, vol. 44, no. 4, pp. 751–771, 2022, <https://doi.org/10.1080/07075332.2021.1985585>.
-

- [89] R. Askew and M. Bone, “Deconstructing prohibitionist ideology: A sociocognitive approach to understand opinions on UK drug policy and the law,” *Int. J. Drug Policy*, vol. 74, pp. 33–40, 2019, <https://doi.org/10.1016/j.drugpo.2019.08.001>.
- [90] J. Přibáň, “Symbolism of the Spirit of the Laws: A Genealogical Excursus to Legal and Political Semiotics,” *Int. J. Semiot. Law*, vol. 22, no. 2, pp. 179–195, 2009, <https://doi.org/10.1007/s11196-009-9101-0>.
- [91] J. K. Baral and S. P. Bakshi, “Development of Kondh women,” *Guru Nanak J. Sociol.*, vol. 15, no. 2, pp. 77–92, 1994.
- [92] N. A. Bukovynska, I. V. Chekhovska, A. S. Romanova, Y. V. Vyshnevskaya, and N. V. Lagovska, “Legal support of gender policy and the correlation with the concept of ‘equality of rights,’” *Avant*, vol. 13, no. 1, 2022, <https://doi.org/10.26913/avant.202201>.
- [93] E. J. King, S. Maman, S. C. Wyckoff, M. W. Pierce, and A. K. Groves, “HIV testing for pregnant women: A rights-based analysis of national policies,” *Glob. Public Health*, vol. 8, no. 3, pp. 326–341, 2013, <https://doi.org/10.1080/17441692.2012.745010>.
- [94] M. Carpenter, “Fixing bodies and shaping narratives: Epistemic injustice and the responses of medicine and bioethics to intersex human rights demands,” *Clin. Ethics*, vol. 19, no. 1, pp. 3–17, 2024, <https://doi.org/10.1177/1477509231180412>.
- [95] A. O’Neill *et al.*, “Providing appropriate health and social care for people with dementia or mild cognitive impairment in the criminal justice system of England and Wales: a thematic analysis of prisoner and staff interview data,” *Heal. Justice*, vol. 13, no. 1, 2025, <https://doi.org/10.1186/s40352-024-00313-5>.
- [96] E. Manea, “Application of Islamic law in the UK and universal human rights,” *Rev. Estud. Int. Mediterr.*, no. 29, pp. 72–87, 2020, <https://doi.org/10.15366/REIM2020.29.006>.
- [97] A. Tahiev, “Practice of Application of the Islamic Family Law in European countries and experience of Ukraine,” *Shidnij Svit*, vol. 2023, no. 1, pp. 114–123, 2023, <https://doi.org/10.15407/orientw2023.01.114>.
- [98] M. M. Keshavjee, “Dispute resolution processes in Islamic cultures,” in *Comparative Dispute Resolution: Research Handbooks in Comparative Law*, Edward Elgar Publishing Ltd., 2020, pp. 479–490. <https://doi.org/10.4337/9781786433039.00044>.
- [99] M. J. Hopman, “Lipstick law, or: the three forms of statutory law,” *J. Leg. Plur. Unoff. Law*, vol. 49, no. 1, pp. 54–66, 2017, <https://doi.org/10.1080/07329113.2017.1308787>.
- [100] P. A. Johnston, R. L. Stringer, and M. C. French, “Pollution of UK estuaries: historical and current problems,” *Sci. Total Environ.*, vol. 106, no. 1–2, pp. 55–70, 1991, [https://doi.org/10.1016/0048-9697\(91\)90020-F](https://doi.org/10.1016/0048-9697(91)90020-F).
- [101] S. Machura, O. Litvinova, and J. Cunningham, “Analysing law in opera,” *Law Humanit.*, vol. 17, no. 1, pp. 90–111, 2023, <https://doi.org/10.1080/17521483.2022.2148381>.
- [102] M. Hemmingsen, “Code is Law: Subversion and Collective Knowledge in the Ethos of Video Game Speedrunning,” *Sport. Ethics Philos.*, vol. 15, no. 3, pp. 435–460, 2021, <https://doi.org/10.1080/17511321.2020.1796773>