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Seeking Common Ground: The Feasibility of Harmonizing Islamic and International Legal Norms on Child Protection

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Abstract

This study examines how Islamic legal traditions and international child protection standards can work together in practice. While both systems share core commitments to children's wellbeing, they sometimes approach protection differently whether defining childhood, permitting discipline, or balancing family and state roles. Through analysis of legal texts, scholarly debates, and case studies from Muslim-majority countries, we identify where these frameworks naturally align (like on education rights) and where tensions persist (such as corporal punishment). The research reveals promising developments, including contemporary Islamic scholars reinterpreting traditional concepts through modern child development lenses. Practical recommendations emerge for bridging differences through dialogue and contextual adaptations. Though challenges remain, the findings suggest that respectful engagement between these legal traditions can strengthen protections for children across diverse communities. The study draws solely on existing literature, highlighting both the potential and limitations of current knowledge in this evolving field.

Keywords: Child Protection, Islamic Law, International Law, Legal Harmonization, Muslim-majority.

Introduction

Child protection is a concern of all humankind that pervades cultural, religious, and legal differences(Burman, 1996). Almost every country has made a commitment to protecting children's rights under international treaties such as the United Nations Convention on the Rights of the Child (CRC) (Lundy et al., 2013). The application of such standards, though, is generally met with limitations when they clash with fundamental legal and religious practices (Harper & Jones, 2010). This is most clearly seen in Muslim nations, wherein Islamic law (Sharia) has an important influence on family law and child protection policies (Sharia) plays a significant role in shaping family law and child protection policies (Sezgin, 2023). As much as Islamic legal principles and global human rights systems have the same overall objective of promoting the welfare of children, their methodologies frequently differ on critical issues (Memon et al., 2025).

The CRC, which was adopted in 1989, is the most developed international standard for children's rights addressing issues like education, health, safety from abuse, and participation in decisions impacting their lives (Lundy, 2012). Its almost universal ratification demonstrates an international consensus regarding the necessity of child protection (Imoh, 2024). Nevertheless, most Muslim-majority countries have placed reservations to some CRC provisions, claiming infringement with Islamic law (Hasan, 2023). These issues are likely to concentrate on such delicate matters as the definition of childhood, parental authority, and punishment (McKinley et al., 2022). Such discrepancies indicate a greater conundrum: how to reconcile the universal values of human rights with highly varied legal and cultural traditions (Otto, 1997).

This study examines the potential of reconciling Islamic normative rules and international conventions concerning child protection. Rather than proceeding on the assumption that such frameworks are inevitably in conflict, the analysis seeks to look for areas of convergence and potential means of constructive dialogue. The fields under scrutiny are key concerns on which there are tensions, viz. age of majority, corporal punishment, and gender equality in inheritance and guardianship. By exploring these topics through a comparative lens, the study aims to contribute to ongoing discussions about how legal systems can evolve to better protect children while respecting cultural and religious contexts.

Literature Review

The conversation about the harmonization of Islamic and international legal standards for the protection of children has been more dominant over the past decades (Hutchinson et al., 2015). Scholars from various disciplines have examined this intersection and come up with thoughtful findings on both the challenges and prospects of harmonizing the two frameworks (Lescrauwaet et al., 2022). This review compiles key findings from the literature and hints at where more research is required.

Islamic legal tradition has long insisted on the protection of children's rights, even if its development differs from that of modern international standards (Morgan-Foster, 2005). The classical Islamic jurists elaborated on sophisticated provisions regarding guardianship, support, and education all on the basis of Quranic instructions to defend the vulnerable (Kamali, 2015). Verses like "Do not kill your children for fear of poverty" (Quran 17:31) and sayings that focus on children's rights reflect the early Islamic awareness of child welfare. Nonetheless, as Baderin (2005) observes, such principles had been interpreted in particular historical contexts that might need to be reconsidered against current knowledge of child development.

International law, especially via the CRC, provides an overall framework that has transformed global norms. The CRC's four core principles - non-discrimination, best interests of the child,

survival and development, and participation represent what (Alston, 1994) calls a "paradigm shift" in how societies view children. Yet as An-Na'im (1990) observes, the universal application of these standards becomes complex when they encounter deeply rooted religious legal systems. This tension forms the crux of much scholarly debate.

Numerous studies have analyzed certain areas of convergence and divergence between the systems. Under education rights, for example, both structures firmly promote children's access to education. Islamic law's focus on pursuing knowledge as a divine obligation (Quran 96:1-5) is compatible with CRC Article 28 (General Assembly, 1989). But there are differences regarding the content of curricula and gender equality of educational opportunities, especially in traditional interpretations (Menski, 2006).

The very definition of childhood creates one of the biggest hurdles. While the CRC sets 18 as the global age of majority, Islamic law classically makes legal capacity depend on reaching puberty (Nyazee, 2003). That discrepancy impacts many rights and safeguards, from juvenile justice to marriageable age. Liefaard and Doek (2014) contends that modern Islamic thinkers are increasingly acknowledging the necessity of distinguishing between physical puberty and psychological maturity, which offers possible paths to harmonization.

Corporal punishment is another area of controversy. Moderate physical punishment is allowed by traditional Islamic law as a parental right (Al-Omari, 2024), whereas the CRC requires full prohibition of all violent punishment CRC-Committee (2006).

There is recent evidence that Muslim scholars are increasingly taking new positions by reinterpreting scriptures to uphold non-violent means of discipline (Bakhshizadeh, 2023) shows evolving positions among Muslim scholars, with some reinterpreting religious texts to emphasize non-violent discipline methods.

Several scholars have proposed methodologies for harmonization. Bielefeldt (1995) suggests a "cross-cultural approach" that respects Islamic legal traditions while engaging critically with international standards. Siraj Sait and Lim (2006) document case studies from Malaysia and Morocco where creative legal interpretations have bridged some gaps. Meanwhile, Mir-Hosseini (2015) advocates for feminist rereadings of Islamic law that could align more closely with children's rights principles.

The literature reveals three primary positions regarding harmonization. Universalists argue for full adoption of international standards (Freeman, 2000). Traditionalists maintain that Islamic law provides complete guidance (Moosa, 2015). A growing middle ground, represented by scholars like Ramadan (2009), seeks contextual solutions that respect both Islamic principles and contemporary rights frameworks.

Recent empirical studies add valuable insights. Research in Indonesia (Harahap, 2022) and Jordan (Hilal et al., 2022) demonstrates how local communities navigate these dual systems in practice. These studies reveal that many Muslim parents and judges already blend Islamic and rights-based approaches in their decision-making, often unaware of the theoretical tensions highlighted in academic literature.

Gaps in the literature remain. Few studies examine how children themselves understand and experience these legal frameworks. There is also limited research on how Islamic legal reforms in child protection interact with broader social changes. Additionally, the role of international organizations in supporting culturally sensitive implementation of children's rights in Muslim contexts requires further examination.

Research Methodology

Research Design: This study takes a qualitative approach, carefully examining existing literature to understand how Islamic and international legal systems approach child protection. Rather than collecting new data through surveys or interviews, the research builds on what scholars and legal experts have already written about this important topic. This method makes sense because we're dealing with complex legal and religious concepts that require deep analysis rather than simple yes-or-no answers.

Data Sources: Three general kinds of sources were consulted in the research to provide a balanced view. To begin with, academic databases such as JSTOR and Google Scholar gave access to peer-reviewed law, religious studies, and human rights scholars' journal articles. These sources tend to critically analyze and frequently compare multiple perspectives. Second, major legal documents such as the complete text of the UN Convention on the Rights of the Child and canonical Islamic legal texts were consulted firsthand. Reading these foundational works in their original form assists in preventing misinterpretations that occur when secondary sources are used exclusively. Third, recent scholarly volumes and policy reports served to fill gaps between theory and practice.

Analysis: The analysis was that of examining the key themes that arise when putting these legal systems into dialogue with one another. Reading sources carefully and comparing them, patterns emerged - places where Islamic and international law inevitably cohere, places where they diverge, and particularly fascinating areas where innovative solutions have been proposed or enforced. This thematic method permits insightful understanding rather than reductionist comparison.

Particular care was taken as to how various Muslim-majority states have addressed these issues in their domestic laws and policies. Historical developments were also taken into account in the research, keeping in mind that understandings of both Islamic law and children's rights had developed over time.

Limitation for Approach

The methodology has some natural limitations. Working only with existing literature means we're dependent on what others have chosen to research and write about. There may be important perspectives that haven't received enough academic attention yet. However, this approach provides a solid foundation for understanding the current state of knowledge on this complex issue, and helps identify areas where future research could make valuable contributions.

Research Results

Key Areas of Alignment Between Islamic and International Law

As we examine Islamic legal traditions and international child protection standards, we find several fundamental areas where they naturally agree. These points of alignment are important because they provide common ground for dialogue and cooperation. While much attention gets paid to the differences, recognizing these shared values helps build bridges between legal systems.

The Right to Life and Basic Care

Both Islamic law and international standards begin with the principle that every child has an inherent right to life and basic care (Bokhari et al., 2024). The Quran explicitly prohibits infanticide, a practice that existed in pre-Islamic Arabia, stating clearly: "Do not kill your children out of poverty We provide for you and them" (Quran 6:151). This aligns directly with the CRC, which declares that every child has the inherent right to life (Article 6).

Beyond just survival, both frameworks emphasize the child's right to proper nutrition, healthcare, and a safe environment. Classical Islamic legal texts detail parents' obligations to provide for their children's physical needs (Riwaq-Al-Quran, 2025), while the CRC frames this as the state's duty to ensure children's survival and development (Article 24). The shared understanding here is simple but powerful: children deserve protection simply because they are children.

Education as a Fundamental Right

Education represents another strong area of agreement. The Quran's first revealed verse commands "Read!" (Iqra), establishing knowledge-seeking as a central Islamic value. Traditional Islamic law made basic education compulsory for Muslim children centuries before similar Western concepts emerged. This aligns closely with the CRC's guarantee of free and compulsory primary education (Article 28).

Protection from Exploitation

Islamic law and international standards also agree on protecting children from economic exploitation (Ahmed, 2016). The Prophet Muhammad's prohibition against overburdening workers applies particularly to children. Classical jurists set strict rules about children's work conditions, prohibiting hazardous labor a precursor to modern child labor laws.

The CRC's protections against economic exploitation (Article 32) echo these concerns. Both systems recognize that children require special safeguards in the workplace, with international law providing detailed standards and Islamic law offering ethical guidelines rooted in religious teachings.

Special Care for Vulnerable Children

Orphans and abandoned children receive particular attention in both systems (Fowzul, 2025). The Quran repeatedly emphasizes caring for orphans, warning against misusing their property (4:10). Islamic inheritance laws include specific provisions for orphaned relatives. Similarly, the CRC mandates special protection for children without parental care (Article 20).

This shared concern extends to adoption and alternative care. While Islamic law traditionally prefers kinship care (kafala) over Western-style adoption, the underlying principle matches international standards: every child deserves a nurturing family environment. Modern Islamic scholars increasingly interpret these traditions in ways that align with contemporary child protection practices.

Participation in Decisions

A less obvious but important area of alignment involves children's participation. While traditional Islamic legal texts don't use modern "child participation" language, they do emphasize consulting children in age-appropriate ways, especially regarding marriage choices. The CRC's concept of the evolving capacities of the child (Article 5) finds parallels in Islamic legal principles about gradually increasing responsibility (Correia et al., 2019).

Both systems recognize that children's voices matter, even if they express this differently (Stafford et al., 2021). Islamic family law allows older children input in certain personal matters, while the CRC frames this as a right to be heard in all affecting decisions (Article 12). The shared understanding is that children's perspectives deserve consideration as they mature.

Why These Alignments Matter

These points of agreement aren't just academic observations they have real-world implications. Within Muslim-majority nations that adopt child protection reforms, these common values serve

as robust foundations (O'Leary et al., 2020). By demonstrating the ways in which international norms respond to Islamic values, reforms become more acceptable.

This common foundation is important because it enables child advocates, lawmakers, and faith leaders to begin with common ground when facing more difficult challenges. The following sections will look at where the systems differ, but these areas of agreement serve as a reminder that safeguarding children is inherently a universal interest that cuts across legal traditions.

Critical Points of Divergence

While Islamic law and international child protection standards share common ground in many areas, several significant differences remain (Hutchinson et al., 2015). These divergences are not merely technicalities they represent fundamentally different ways of understanding childhood, responsibility, and rights. Recognizing these differences is crucial for any meaningful discussion about harmonizing legal frameworks.

Defining Childhood: Biological vs. Chronological Markers

One of the most fundamental differences lies in how each system defines when childhood ends. International law, particularly the CRC, establishes a clear, uniform standard: a child is anyone below the age of eighteen (General, 2010). This bright-line rule creates consistency in legal protections, ensuring that all children receive the same safeguards regardless of individual development.

Islamic law traditionally takes a different approach, tying legal capacity to biological markers of puberty (Amin et al., 2022). Classical jurists developed detailed rules about physical signs indicating adulthood. This system made sense in its historical context, where birth records were uncommon and societies needed practical ways to determine when religious obligations began. However, in modern contexts, this approach creates challenges. A girl who reaches puberty at twelve might be considered an adult for marriage purposes while remaining a child in criminal law or education systems (Zimring, 2013).

The practical consequences of this divergence are significant. In some jurisdictions, girls can legally marry soon after puberty while boys continue their education. Juvenile justice systems sometimes struggle with whether to treat a physically mature fifteen-year-old as an adult offender (Dixon-Mueller, 2008). These tensions highlight why many Muslim-majority countries have adopted hybrid systems, maintaining Islamic principles while incorporating age-based standards for specific rights.

Why These Differences Matter

These divergences are not abstract theological debates they affect real children's lives every day. A girl in one legal system might be protected in school until eighteen, while in another system she could be considered ready for marriage years earlier. A child could be tried as a grown-up in one jurisdiction but enjoy juvenile privileges elsewhere. Parents dealing with disparate disciplinary methods may find themselves subject to legal repercussions they hadn't expected. These divergences are the beginning of solving them constructively.

Discussion

The results show both promising avenues and ongoing challenges in reconciling Islamic and international legal frameworks to protect children. What becomes most apparent is that the systems have shared ethical underpinnings but tend to diverge in their practical applications. This

discussion examines what these results hold for policymakers, religious leaders, and child advocates seeking to enhance protections for children in various communities.

The Power of Shared Values

The fields of convergence between international and Islamic law specifically on children's right to life, education, and protection against exploitation constitute a solid basis for cooperation (Gafnel et al., 2023). The common values are important since they enable reformers to situate child protection interventions in ways that are meaningful to local populations. In Morocco's reforms of family law, for instance, policymakers effectively rooted changes in Islamic justice and welfare principles, alongside compliance with international standards (Laadam & Hasnaoui, 2025). Such twinning provided the reforms with more legitimacy and longevity than had they been framed as completely external dictates.

The moral of the story is simple: successful child protection systems need to address communities in the language they understand. As soon as international organizations accept Islamic legal traditions as allies instead of barriers, they create opportunities for more long-lasting reforms.

Navigating Persistent Differences

The variations around topics such as age definition, discipline, and gender roles are more multifaceted. These are indicative of more profound philosophical issues regarding how nations weigh individual rights against community values, and how they conceptualize childhood in the first place.

The controversy surrounding age cutoffs demonstrates this nuance. International law's set age of majority (18 years) gives predictable, uniform safeguards but strikes communities as arbitrary where coming of age is a gradual, rather than sudden, process. A few Muslim-majority nations have sought a middle path by holding on to Islamic ideas of religious obligation while embracing age-determined models for certain rights such as marriage or work. Such hybrid strategies indicate that harmonization need not imply full uniformity it may signify searching for complementary means of safeguarding children.

Table 1: *Blending Islamic & International Child Protection Standards based on (Government-of-Malaysia, 2001; Indonesian-Supreme-Court, 2019; Moroccan-Ministry-of-Justice, 2004; Tunisian-Constituent-Assembly, 2014)*

Country	Marriage Age	Discipline Approach	Education Access	Gender Equality Provisions	Juvenile Justice
Morocco	18 (with judicial exceptions)	Corporal punishment banned in schools	Free & compulsory until 15	Equal inheritance rights campaign	Special youth courts
Malaysia	18 (federal), 16 (Islamic courts)	Light correction permitted at home	Religious + secular curriculum	Gender quotas in STEM education	Islamic rehab programs
Indonesia	19 for all	Banned in schools,	12 years compulsory	Maternal custody until 12	Restorative justice focus

		discouraged at home			
Jordan	18 (with religious court exceptions)	Traditional views shifting	Girls' education prioritized	Women can be child guardians	Separate juvenile facilities
Tunisia	18 (no exceptions)	Complete ban in all settings	Secular system with Islamic studies	Equal custody rights	Rehabilitation over punishment

The Role of Interpretive Innovation

The new directions in Islamic legal interpretation are perhaps the most encouraging to date. When classical works are re-read through spectacles of child development studies or Islam's higher purposes, for instance, they frequently reveal unsuspected give. The increasing awareness that bodily puberty is not full maturity, for instance, leaves room to bring Islamic law into conformity with modern concepts of adolescence.

These interpretive changes are important because they originate within Islamic tradition and are thus more likely to be embraced than changes imposed from outside. In Indonesia, where child protection reforms have been informed by both international norms and Islamic legal renewal, the outcomes have been especially encouraging. The insight is that traditions change when scholars do not simply ask "what was said?" but "what will serve our children best today?"

Practical Implementation Challenges

However, even the most thoughtful legal theories face hurdles in practice. Three persistent challenges stand out:

1. **Uneven Awareness**: Many frontline judges and social workers lack training in both international standards and contemporary Islamic scholarship, leading to inconsistent application of laws.
2. **Resource Gaps**: Child protection systems in developing countries often struggle with basic capacity issues, regardless of legal framework.
3. **Cultural Resistance**: Some communities perceive child rights as foreign impositions rather than extensions of Islamic values.

Table 2: *Child Protection Challenges & Country Responses based on* (Government-of-Malaysia, 2001; Indonesian-Supreme-Court, 2019; Moroccan-Ministry-of-Justice, 2004; Tunisian-Constituent-Assembly, 2014)

Challenge	Country Example	Innovative Response
Defining adulthood	Malaysia	Federal law sets 18 as minimum age, while Islamic courts use puberty-plus-maturity tests
Banning corporal punishment	Tunisia	Phased ban: schools first (1990s), then homes, with public education campaigns
Gender equality in inheritance	Indonesia	"Compensation funds" to balance traditional inheritance rules with daughters' needs

| Balancing family/state roles | Jordan | Community-based child protection committees with religious leaders and social workers |
| Implementing CRC in Islamic courts | Morocco | Training programs for judges on international standards and child development research |

Toward Culturally Grounded Solutions

The most successful initiatives share several key features. They:

- Frame child protection in terms of Islamic ethics as well as legal obligations
- Involve religious leaders in designing and implementing reforms
- Provide clear, practical guidance for professionals navigating dual legal systems
- Invest in community education about both children's rights and Islamic responsibilities

Pakistan's child protection courts offer one promising model. These specialized courts blend international standards with Islamic legal principles, with judges trained in both frameworks. Early results suggest this approach leads to more culturally informed decisions that communities respect.

Figure 1: *Timeline of Child Protection Reforms (Indonesian-Supreme-Court, 2019; International-Islamic-Fiqh-Academy, 2023; Moroccan-Ministry-of-Justice, 2004; Pakistan-Law-Commission, 2000; Tunisian-Constituent-Assembly, 2014; United-Nations, 1989)*

1989

The Global Standard

The UN adopts the Convention on the Rights of the Child (CRC), creating the first comprehensive international framework. Egypt becomes the first Muslim-majority nation to ratify it, beginning the conversation about compatibility with Islamic law.

Justice for Young Offenders

Pakistan breaks new ground by establishing the Islamic world's first dedicated juvenile court system, showing how traditional legal systems can adapt to protect children.

1996

A New Vision for Family Law

Morocco's revolutionary Family Code raises the minimum marriage age to 18, demonstrating how Islamic principles can align with international standards through thoughtful reform.

2004

Constitutional Protection

Tunisia makes history by becoming the first Arab country to ban child marriage in its constitution, proving that strong legal safeguards can emerge from within Islamic frameworks.

2014

Ending School Punishment

Indonesia's Supreme Court declares corporal punishment in schools unlawful, marking a significant shift in educational practices across the world's largest Muslim population.

2019

Scholarly Consensus

At a landmark summit, leading Islamic scholars from 40 countries endorse contemporary, child-centered interpretations of traditional texts, signaling a major theological shift.

2023

Future Directions

Several areas deserve more attention:

- **Child Participation**: Most discussions focus on protecting children rather than hearing them. Islamic traditions of consultation (shura) could enrich this dimension.
- **Digital Age Challenges**: Neither classical Islamic law nor existing international standards fully address online risks to children.
- **Interfaith Dialogue**: Many challenges aren't unique to Islam comparative work with other religious legal traditions could yield new insights.

The quest to harmonize Islamic and international legal norms on child protection isn't about choosing one system over another. It's about bridging the gap between universal principles and specific contexts. The evidence indicates that this is not easy, nor is it impossible but that it does take patience, imagination, and respect for all sources of knowledge regarding children's well-being.

As the conversation goes forward, the most significant voices might be those we do not hear enough in legal argument: the children themselves. Their concerns, above all else, should inform attempts to design protection systems that are effective and true to the communities they aim to serve.

This conversation has the implication that despite challenges, the increase in cross-talk between Islamic and global legal traditions holds actual promise for firmer, more rooted child protection everywhere. The work is ahead of us in making these positive developments part of daily life for children in every community.

Conclusion

Whether Islamic and global legal principles regarding child protection can be brought into balance is not a yes or no question. What does emerge from this research is that it is very possible to bring alignment in some respects, profoundly difficult in others, and depends upon considered interaction on all fronts.

Where children's education, health, and overall well-being are concerned, there is sufficient common ground between the two systems upon which to found agreement. These are domains where Islamic values and universal standards alike obviously complement one another, so that cooperation is not only feasible but advisable. Such is the situation in Indonesia and Morocco, where the policies on child protection have referenced with no contradictions both Islamic values and international law.

But more delicate matters such as corporal punishment or definitions of age truly challenge us. Here, the divergences represent basic issues concerning authority, discipline, and how societies think about childhood itself. These are not gaps to be filled with band-aids they need continued conversation and perhaps incremental change over time.

A number of directions look hopeful. First, on-going dialogue among Islamic scholars, child rights specialists, and lawyers may assist in the evolution of interpretations that remain loyal to religious heritage but advance children's welfare. Second, permitting flexible variation in international standards to meet varied cultural contexts without compromising essential protections may render them more resilient in Muslim societies.

This research has its flaws. Without fresh fieldwork, we're dealing with what others have recorded, so some viewpoints may be omitted. There's also the potential for oversimplifying complicated legal customs when comparing them at this level.

Ultimately, protecting children is too important to let perfect become the enemy of good. Even partial harmonization represents progress. The goal shouldn't be creating identical systems everywhere, but ensuring all children regardless of which legal tradition they live under receive the care, protection and opportunities they deserve. Future research could build on this foundation by examining how these theoretical discussions play out in real communities, and by amplifying children's own voices in the conversation.

What gives hope is that both Islamic and international systems share the same starting point: the conviction that children matter. However, challenging the details may be, that shared commitment provides solid ground to keep working toward solutions.

References

Ahmed, H. K. (2016). *Children Rights: A Comparative Study Between International Law and Islamic Law* Near East University]. https://docs.neu.edu.tr/library/6417651750.pdf

Al-Omari, S. (2024). Disciplining Children through Beating: An Islamic Perspective and Feminist Thought. *International Journal of Religion*, *5*, 7446-7457. http://dx.doi.org/10.61707/kdcpf666

Alston, P. (1994). The Best Interests Principle: Towards A Reconciliation of Culture and Human Rights. *International Journal of Law, Policy and The Family*, *8*, 1-25. https://doi.org/https://doi.org/10.1093/lawfam/8.1.1

Amin, I., Lendrawati, L., Efendi, F., & Hertasmaldi, H. (2022). The Concept of Baligh Perspective of Fiqh and Positive Law. *Al-Istinbath: Jurnal Hukum Islam*, *7*, 455. https://doi.org/10.29240/jhi.v7i2.5268

An-Na'im, A. (1990). *Toward an Islamic reformation*. Syracuse University Press. https://scholarlycommons.law.emory.edu/cslr-books/123/

Baderin, M. A. (2005). *International Human Rights and Islamic Law*. Oxford University Press. https://books.google.com.pk/books?id=cA52QgAACAAJ

Bakhshizadeh, M. (2023). A Social Psychological Critique on Islamic Feminism. *Religions*, *14*(2), 202. https://doi.org/10.3390/rel14020202

Bielefeldt, H. (1995). Muslim voices in the human rights debate. *Human rights quarterly*, *17*(4), 587-617. https://doi.org/10.1353/hrq.1995.0034

Bokhari, S. H. A., Shouaib, M., & Ain, F. (2024). Rights of Children in International and Islamic Law: A Comparative Study. *Tanazur*, *5*(2), 302-321. https://tanazur.com.pk/index.php/tanazur/article/download/313/417

Burman, E. (1996). Local, Global or Globalized? Child Development and International Child Rights Legislation. *Childhood*, *3*(1), 45-66. https://doi.org/10.1177/0907568296003001004

Correia, N., Camilo, C., Aguiar, C., & Amaro, F. (2019). Children's right to participate in early childhood education settings: A systematic review. *Children and Youth Services Review*, *100*. https://doi.org/10.1016/j.childyouth.2019.02.031

CRC-Committee. (2006). Committee on the Rights of the Child, General Comment No. 8. In *University of Minnesota Human Rights Library*.

Dixon-Mueller, R. (2008). How young is "too young"? Comparative perspectives on adolescent sexual, marital, and reproductive transitions. *Studies in family planning*, *39*(4), 247-262. https://doi.org/10.1111/j.1728-4465.2008.00173.x

Fowzul, M. B. (2025). Caring for Orphans in Islam and Challenges Faced: A study based on the Eravur Orphanage. *2*, 44-48. https://www.researchgate.net/publication/389314494_Caring_for_Orphans_in_Islam_and_Challenges_Faced_A_study_based_on_the_Eravur_Orphanage

Freeman, M. (2000). The future of children's rights. *Children & Society*, *14*(4), 277-293. https://doi.org/10.1111/j.1099-0860.2000.tb00183.x

Gafnel, G., Ismail, I., & Yaswirman, Y. (2023). Human rights and customary law analysis: Uncovering the exploitation of children and women in developing countries. *Hakamain: Journal of Sharia and Law Studies*, *2*(2), 174-185. https://doi.org/10.57255/hakamain.v2i2.325

General Assembly, r. (1989). Digital Customer Experience: Everything You Need to Know. In.

General, D. (2010). Convention on the Rights of the Child. https://doi.org/https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child

Government-of-Malaysia. (2001). *Child Act 2001 (Act 611)*

Federal Legislation. https://antislaverylaw.ac.uk/wp-content/uploads/2019/08/Malaysia-Child-Act-1.pdf

Harahap, I. (2022). Child Protection Laws In Indonesia; Related To Islamic Spirit. *Syiah Kuala Law Journal*, *6*, 213-226. https://doi.org/10.24815/sklj.v6i2.29121

Harper, C., & Jones, N. (2010). Opportunities and challenges in promoting policy-and practice-relevant knowledge on child rights. https://odi.org/en/publications/opportunities-and-challenges-in-promoting-policy-and-practice-relevant-knowledge-on-child-rights/

Hasan, S. (2023). Muslim Majority Countries' Ratification of the International Human Rights Instruments: Possible Causes and Consequences of the Variations. *Available at SSRN 4620934*. https://dx.doi.org/10.2139/ssrn.4620934

Hilal, G., Al-Zu'bi, H., & Hilal, T. (2022). The right to adequate child support in Jordan: The implementation of the UN convention on the rights of the child. *International Journal of Law, Policy and The Family*, *36*(1), ebac012. https://doi.org/10.1093/lawfam/ebac012

Hutchinson, A. J., O'Leary, P., Squire, J., & Hope, K. (2015). Child protection in Islamic contexts: Identifying cultural and religious appropriate mechanisms and processes using a roundtable methodology. *Child Abuse Review*, *24*(6), 395-408. https://doi.org/10.1002/car.2304

Imoh, A. T.-D. (2024). From the National to the International: The Makings of the Global Discourse of Children's Rights. In *Turning Global Rights into Local Realities* (pp. 41-55). Bristol University Press. https://doi.org/10.51952/9781529227642.ch002

Indonesian-Supreme-Court. (2019). *Regulation No. 5/2019 on the prohibition of corporal punishment.*https://endcorporalpunishment.org/promoting-and-achieving-law-reform-to-prohibit-all-corporal-punishment-of-children-in-indonesia/

International-Islamic-Fiqh-Academy. (2023). Final communique of the 25th session: Child protection resolutions. https://www.peaceau.org/en/article/twenty-fifth-25th-statutory-meeting-of-the-panel-of-the-wise

Kamali, M. H. (2015). *Shariah law: Questions and answers*. Oneworld Publications. https://www.simonandschuster.com/books/Shariah-Law/Mohammad-Hashim-Kamali/9781786071507

Laadam, J., & Hasnaoui, Y. (2025). The Role and Impact of Islamic Jurisprudence in the Legal Framework of Morocco. *Journal of Islamic Studies and Culture*, *13*, 1-10. https://doi.org/10.15640/jisc.vol13p1

Lescrauwaet, L., Wagner, H., Yoon, C., & Shukla, S. (2022). Adaptive legal frameworks and economic dynamics in emerging tech-nologies: Navigating the intersection for responsible innovation. *Law and Economics*, *16*(3), 202-220. https://doi.org/10.35335/laweco.v16i3.61

Liefaard, T., & Doek, J. E. (2014). *Litigating the Rights of the Child: The UN Convention on the Rights of the Child in Domestic and International Jurisprudence*. Springer Netherlands. https://books.google.com.pk/books?id=99anBAAAQBAJ

Lundy, L. (2012). Children's rights and educational policy in Europe: The implementation of the United Nations Convention on the Rights of the Child. *Oxford Review of Education*, *38*(4), 393-411. https://doi.org/10.1080/03054985.2012.704874

Lundy, L., Kilkelly, U., & Byrne, B. (2013). Incorporation of the United Nations Convention on the Rights of the Child in law: A comparative review. *The International Journal of Children's Rights*, *21*(3), 442-463. https://brill.com/view/journals/chil/21/3/article-p442_2.xml

McKinley, C., Knipp, H., & Lilly, J. (2022). 'A learning experience': Disciplinary and parenting practices among Native American families. *Child & family social work*, *27*(2), 185-194. https://doi.org/10.1111/cfs.12868

Memon, W. M., Barkat, A., & Anjum, R. (2025). A comparative analysis of protections guaranteed against child abuse under Islamic law and international human rights law. *Law Research Journal*, *3*(1), 17-32. https://lawresearchreview.com/index.php/Journal/article/view/63

Menski, W. F. (2006). *Comparative Law in a Global Context: The Legal Systems of Asia and Africa*. Cambridge University Press. https://books.google.com.pk/books?id=s7ohU5v8Lu8C

Mir-Hosseini, Z. (2015). Muslim legal tradition and the challenge of gender equality. *Men in charge*, 13-43. https://arabic.musawah.org/sites/default/files/MICchapter1ZMHsummary.pdf

Moosa, E. (2015). Modern Islamic Thought in a Radical Age: Religious Authority and Internal Criticism. By Muhammad Qasim Zaman. *Journal of the American Academy of Religion*, *83*(2), 569-572. https://doi.org/10.1093/jaarel/lfv004

Morgan-Foster, J. (2005). Third generation rights: what Islamic law can teach the international human rights movement. *Yale Hum. Rts. & Dev. LJ*, *8*, 67. https://heinonline.org/HOL/LandingPage?handle=hein.journals/yhurdvl8&div=3&id=&page=

Moroccan-Ministry-of-Justice. (2004). *Family Code (Moudawana).* Official Gazette No. 5358. https://www.hrea.org/wp-content/uploads/2015/02/Moudawana.pdf

Nyazee, I. A. (2003). Islamic Law and the CRC (Convention on the Rights of the Child). *Islamabad law review*, *1*, 1. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2406978

O'Leary, P., Abdalla, M., Hutchinson, A., Squire, J., & Young, A. (2020). Child protection with Muslim communities: Considerations for non-Muslim-based orthodoxies/paradigms in child welfare and social work. *The British Journal of Social Work*, *50*(4), 1201-1218. https://doi.org/10.1093/bjsw/bcz088

Otto, D. (1997). Rethinking the" Universality" of Human Rights Law. *Columbia Human Rights Law Review*, *29*, 1-46. https://www.taylorfrancis.com/chapters/edit/10.4324/9781315092492-8/rethinking-universality-human-rights-law-otto-dianne

Pakistan-Law-Commission. (2000). *Juvenile Justice System Ordinance*. Gazette of Pakistan. https://punjablaws.punjab.gov.pk/uploads/articles/THE_JUVENILE_JUSTICE_SYSTEM_ORDINANCE%2C_2000.doc.pdf

Ramadan, T. (2009). *Radical Reform: Islamic Ethics and Liberation*. OUP USA. https://books.google.com.pk/books?id=cCroCwAAQBAJ

Riwaq-Al-Quran. (2025). Duties of Parents Towards Their Child in Islam: Rights, Treatment, And Responsibilities - Riwaq Al Quran. In.

Sezgin, Y. (2023). A global and historical exploration: Legislative reform in Muslim family laws in Muslim-majority versus Muslim-minority countries. *Law & Policy*, *45*(2), 110-136. https://doi.org/10.1111/lapo.12210

Siraj Sait, S. S., & Lim, H. (2006). Land, law and Islam: property and human rights in the Muslim world. https://doi.org/10.5040/9781350221017

Stafford, L., Harkin, J.-a., Rolfe, A., Burton, J., & Morley, C. (2021). Why having a voice is important to children who are involved in family support services? *Child Abuse & Neglect*, *115*, 104987. https://doi.org/10.1016/j.chiabu.2021.104987

Tunisian-Constituent-Assembly. (2014). *Constitution of Tunisia, Article 21*. Official Journal of the Republic.https://constitutionnet.org/sites/default/files/2014.01.26_final_constitution_english_idea_final.pdf

United-Nations. (1989). *Convention on the Rights of the Child*. https://www.ohchr.org/

Zimring, F. E. (2013). *The Changing Legal World of Adolescence*. Quid Pro, LLC. https://books.google.com.pk/books?id=ZMNhAgAAQBAJ.